



2002 Long Range Development Plan/ Northwest Housing Infill Project Final Environmental Impact Report

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VOLUME 3

**Volumes 1 & 2 Text Changes
and Responses to Comments**

Volume 3

**University of California, Los Angeles
2002 Long Range Development Plan/
Northwest Housing Infill Project
Final Environmental Impact Report
SCH No. 2002031115**

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CONTENTS

VOLUME 3

	Preface.....	v
	Review Process.....	vi
	Revisions to the Draft EIR.....	vi
	Mitigation Monitoring and Reporting Programs.....	vi
Chapter I	Introduction	I-1
	A. CEQA Requirements	I-1
	B. Use of the Final EIR.....	I-1
Chapter II	Text Changes to the Draft EIR	II-1
	A. Format of Text Changes.....	II-1
	B. Text Changes.....	II-1
	1. Volume 1	II-1
	2. Volume 2	II-13
	C. Figure Changes.....	II-19
Chapter III	Responses to Comments	III-1
	A. Overview	III-1
	B. Responses to Comments	III-13
	1. Topical Responses.....	III-13
	2. Individual Responses to Comments	III-29
	<i>Comment Letters 1 through 99</i>	

VOLUME 3a

	Preface.....	v
Chapter III.B.2	Individual Responses to Comments (Continued).....	III-551
	<i>Comment Letters 100 through T</i>	
Chapter IV	UCLA 2002 Long Range Development Plan Mitigation Monitoring and Reporting Program	IV-1
	A. Introduction	IV-1
	B. Project Description	IV-1
	C. Mitigation Monitoring and Reporting Program Description.....	IV-2
	1. Roles and Responsibilities	IV-2

2. Mitigation Monitoring Procedures	IV-3
3. Mitigation Timing	IV-5
4. Program Changes	IV-6
5. The Monitoring and Reporting Program	IV-6

Chapter V	UCLA Northwest Housing Infill Project Mitigation Monitoring and Reporting Program.....	V-1
A.	Introduction	V-1
B.	Project Description	V-1
C.	Mitigation Monitoring and Reporting Program Description.....	V-2
1.	Roles and Responsibilities	V-2
2.	Implementation Procedures and Mitigation Timing.....	V-2
3.	Monitoring and Reporting Program	V-3

Tables

Volume 3

Table III-1	List of Commenters	III-2
Table III-2	University of California Suggested Enrollment Targets General Campus Budgeted FTE	III-21
Table III-3	University of California Suggested Enrollment Targets General Campus Budgeted FTE Percentage Increase (1998-99 to 2010-11)	III-21

Volume 3a

Table IV-1	University of California, Los Angeles 2002 Long Range Development Plan Mitigation Monitoring and Reporting Program.....	IV-7
Table V-1	University of California, Los Angeles Northwest Housing Infill Project Mitigation Monitoring and Reporting Program	V-4

PREFACE

This document, in its entirety (Volumes 1, 1a, 2, 3, and 3a), constitutes the Final Environmental Impact Report (Final EIR) for the 2002 Long Range Development Plan (LRDP) and Northwest Housing Infill Project (NHIP). A Final EIR is defined by Section 15362(b) of the California Environmental Quality Act (CEQA) *Guidelines* as "...containing the information contained in the Draft EIR; comments, either verbatim or in summary, received in the review process; a list of persons commenting; and the response of the Lead Agency to the comments received."

This 2002 LRDP Final EIR is composed of five volumes. They are as follows:

- Volumes 1 and 1a 2002 LRDP Draft EIR and Technical Appendices**—These volumes describe the existing environmental setting on the UCLA campus and in the vicinity of the campus; analyze potential impacts on that setting due to implementation of the 2002 LRDP; identify mitigation measures that could avoid or reduce the magnitude of significant impacts; evaluate cumulative impacts that would be caused by the project in combination with other future projects or growth that could occur in the region; analyze growth-inducing impacts; and provide a full evaluation of the alternatives to the proposed project that could eliminate, reduce, or avoid project-related impacts. Refer to the Contents of Volume 1 for a complete list of appendices. Any text revisions due to corrections of errors, or resulting from comments received on the Draft EIR, are included in Volume 3.
- Volume 2 2002 LRDP/NHIP Draft EIR and Technical Appendices**—This volume provides project-specific analysis of the NHIP, a component of the 2002 LRDP. This volume describes the existing environmental setting on the NHIP project site and in the vicinity of the project site; analyzes potential impacts on that setting due to construction and operation of the NHIP; identifies mitigation measures that could avoid or reduce the magnitude of significant impacts; and provides a full evaluation of the alternatives to the proposed project that could eliminate, reduce, or avoid project-related impacts. Refer to the Contents of Volume 2 for a complete list of appendix titles. Any text revisions due to corrections of errors, or resulting from comments received on the Draft EIR, are included in Volume 3.
- Volumes 3 and 3a Draft EIR Text Changes, Responses to Comments, and Mitigation Monitoring and Reporting Programs**—This volume contains an explanation of the format and content of the Final EIR; all Draft EIR text changes; a complete

list of all persons, organizations, and public agencies that commented on the Draft EIR; copies of the actual comment letters; the transcript from the public hearing; the Lead Agency's responses to all comments; and the Mitigation Monitoring and Reporting Programs (MMRPs).

REVIEW PROCESS

The Draft LRDP and EIR for the 2002 LRDP, including the NHIP, was issued on October 31, 2002, and initially circulated for public review and comment for a 46-day period scheduled to end on December 16, 2002. In response to a request from the community, the public review and comment period was extended an additional 4 days to December 20, 2002. During the public review period, copies of the Draft EIR were distributed to public agencies through the State of California, Office of Planning and Research. UCLA also directly distributed the document to over eighty individuals, agencies, and organizations. Copies of the Draft EIR were available for review at two on-campus libraries and nine off-campus libraries. In addition, the Draft EIR was available on UCLA's website and at the UCLA Capital Programs Facility, which is located at 1060 Veteran Avenue, Third Floor, on the UCLA campus.

Although not required by CEQA or the *CEQA Guidelines*, a Community Information and EIR Scoping Meeting for the proposed project was also held on April 6, 2002, to solicit input from interested agencies, individuals, and organizations regarding the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in this EIR. A public hearing was also held on November 20, 2002, on the UCLA campus during which the public was given the opportunity to provide comments on the Draft EIR. Nine persons presented verbal comments on the proposed project and the Draft EIR during the public hearing.

REVISIONS TO THE DRAFT EIR

Revisions to the text of the Draft EIR have been made in Volume 3 of this Final EIR, with ~~striketrough~~ text for deletions and double underline text for additions.

MITIGATION MONITORING AND REPORTING PROGRAMS

An MMRP will be adopted by The Board of Regents of the University of California (The Regents) for both the 2002 LRDP and the NHIP, as required for compliance with Sections 21081(a) and 21081.6 of the Public Resources Code. The proposed MMRPs are included in their entirety in Volume 3a (Chapter IV and Chapter V) of this Final EIR. All 2002 LRDP and NHIP mitigation measures included in the 2002 LRDP Final EIR for this project would be monitored by the appropriate campus entity, and reported on an annual basis.

A. CEQA REQUIREMENTS

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

The Final EIR shall consist of:

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

An overview of the contents of the Final EIR, indicating compliance with Section 15132 of the *CEQA Guidelines*, is provided in the "Preface" to Volume 3. In summary, this Final EIR consists of five volumes, including:

- **Volumes 1 and 1a**—2002 LRDP Draft EIR and Technical Appendices
- **Volume 2**—NHIP Draft EIR and Technical Appendices
- **Volumes 3 and 3a**—Draft EIR Text Changes, Responses to Comments, and Mitigation Monitoring and Reporting Programs

The Lead Agency must provide each agency that commented on the 2002 LRDP Draft EIR with a copy of the Lead Agency's proposed response at least 10 days before certifying the 2002 LRDP Final EIR. In addition, the Lead Agency may also provide an opportunity for members of the public to review the Final EIR prior to certification, though this is not a requirement of CEQA.

B. USE OF THE FINAL EIR

The Final EIR allows the public and The Regents an opportunity to review revisions to the Draft EIR, Responses to Comments, and other components of the EIR, such as the Mitigation Monitoring Program, prior to taking any action regarding approval of the project. The Final EIR serves as the environmental document to support approval of the proposed project, either in whole or in part.

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

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

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

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

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

These certifications, the Findings of Fact, and the Statement of Overriding Considerations are included in a separate Findings document. Both the Final EIR and the Findings are submitted to The Regents for consideration of the proposed project.

Chapter II

TEXT CHANGES TO THE DRAFT EIR

A. FORMAT OF TEXT CHANGES

Text changes are intended to clarify or correct information in the Draft EIR in response to comments received on the document or as initiated by Lead Agency (University) staff. Revisions are shown in Section II.B as excerpts from the Draft EIR text, with a ~~line through~~ deleted text and a double underline beneath inserted text.

B. TEXT CHANGES

This section includes revisions to text, by Draft EIR section, that were initiated either by Lead Agency staff or in response to public comments. The changes appear in order of their location in the Draft EIR.

I. Volume I

Chapter 2 (Summary of Environmental Impacts and Mitigation Measures)

Page 2-5, Subheading "Traffic and Circulation"

- Operational impacts resulting from an exceedance of the applicable LOS criteria for vehicle trips during the regular session at ~~five~~ four intersections during the A.M. peak hour
- Operational impacts resulting from an exceedance of the applicable LOS criteria for vehicle trips during the twelve-week summer session at ~~four~~ twelve intersections (two in the A.M. peak hour, ~~++ three intersections~~ in P.M. peak hour, and ~~ten~~ seven intersections in both the A.M. and P.M. peak hours)
- Construction impacts resulting from truck trips

If the City of Los Angeles does not implement all feasible mitigation measures identified in the 2002 LRDP Draft EIR, then impacts could remain significant and unavoidable at five intersections (in the A.M. peak hour) during the regular session and at twenty-five intersections (five in the A.M. peak hour, twelve in the P.M. peak hour, and eight in both the A.M. and P.M. peak hours) during the twelve-week period of summer instruction.

Page 2-30, Table 2-1, third row, third column, before first paragraph

MM 4.13-0 The campus shall develop a bicycle long range plan.

Page 2-32, Table 2-1, seventh paragraph

MM 4.13-2(p) If the City of Los Angeles elects not to install ATCS at the intersection of Beverly Glen Boulevard and Greendale Drive, the campus shall provide fair share funding for restriping the west side of Beverly Glen Boulevard by the City of Los Angeles to provide dedicated ~~northbound and southbound through and left/right-turn lanes.~~

Page 2-38, Table 2-2 (Comparison of Alternatives to the Proposed Project)

Table 2-2 Comparison of Alternatives to the Proposed Project			
Impact Area	Alternative 1 No Project/ Continued Implementation of the 1990 LRDP Through 2010-11	Alternative 2 Off-Site Alternative	Alternative 3 Regular Session Growth Only
Aesthetics	LS (Same)	LSSU (Greater)	LS (Same)
Air Quality—Construction	SU (Same)(Less)	LSSU (Greater)	SU (Same)
Air Quality—Operation	SU (Less)	SU (Same)	SU (Less)
Biological Resources	LS (Same)	LS (Greater)	LS (Same)
Cultural Resources	LS (Same)	LS (Greater)	LS (Same)
Geology and Soils	LS (Same)	LS (Greater)	LS (Same)
Hazards and Hazardous Materials	LS (Same)	LS (Same)(Greater)	LS (Same)
Hydrology and Water Quality	LS (Same)	LS (Greater)	LS (Same)
Land Use and Planning	LS (Same)	LS (Greater)(Less)	LS (Same)
Noise—Construction	SU (Same)(Less)	SU (Greater)	SU (Same)
Noise—Operation	LS (Less)	LS (Same)	LS (Same)
Population and Housing	LS (Same)	LS (Same)	LS (Greater)
Public Services	LS (Less)	LS (Greater)	LS (Same)
Recreation	LS (Less)	LS (Same)	LS (Same)
Transportation—Construction	SU (Same)(Less)	SU (Less)(Greater)	SU (Same)
Transportation—Operation	SU (Less)	SU (Less)	SU (Greater)
Utilities and Service Systems	LS (Same)	LSSU (Greater)	LS (Same)
Relationship to objectives	Less	Less	Less

LS = Less Than Significant
 PS = Potentially Significant
 S = Significant
 SU = Significant and Unavoidable

Chapter 3 (Project Description)

Page 3-17, Section 3.4.4 (Open Space), first paragraph

Open space is an essential component of the aesthetic and social life of the campus. Of the total campus area of 419 acres, approximately 152 acres (or 36 percent), consist of green space, including landscaped buffer areas surrounding the northern, eastern, and western boundaries of the main campus; many open space preserves; landscaped courtyards, plazas, and gardens; recreational areas; and campus entries. ~~All~~ The majority of the plant life on the UCLA campus has been introduced along with the development of buildings, and the majority of the vegetation consists of nonnative rather than native species. Numerous varieties of imported trees and shrubs that have adapted to the southern California climate have become the foundation of the campus reputation for a garden-like environment.

Section 4.1 (Aesthetics)

Page 4.1-2, Subheading "Campus Landscaping," first paragraph

The ~~site of the~~ UCLA campus ~~was originally located on a treeless, chaparral covered site~~ included a variety of native and non-native plant communities that have been described in prior LRDPs as "a treeless chaparral," and some plants associated with those communities still persist in the vicinity of Stone Canyon Creek and in the Northwest zone. Landscaping of the campus began in 1925, with

approximately 3,600 trees planted by 1928. Professor J.W. Gregg originally designed the landscape to create what was referred to as the "California look." Ralph D. Cornell was appointed Campus Landscape Architect in 1937 and continued to serve UCLA as a consultant until 1972. His firm (Cornell, Bridgers, Troller, and Hazlett) designed many of the major landscape projects on campus, including numerous basic features that provide a unifying landscape motif, although most of the initial plantings have been modified over the last seven decades as the campus evolved from its beginnings to the internationally recognized teaching, research, and public service institution it is today. Along with pedestrian pathways and open areas, the ornamental landscaping continues to complement the different styles of architecture found on campus. Several areas of lush landscaping are found within the University's grounds; however, the majority of the plant life on the campus is ornamental, rather than native, and ~~all-most~~ vegetation has been introduced coincident with the development of buildings.

Page 4.1-11, Subheading "Edge Conditions," first paragraph

...The edges of the campus are planted primarily with mature eucalyptus, Canary Island pines, ~~and~~ camphor trees, or other landscaping that enhances the visual quality of the campus borders....

Section 4.3 (Biological Resources)

Page 4.3-1, third paragraph

...The comment letter from The Urban ~~Wildlife~~ Wildlands Group, Inc. requested that the EIR address potential impacts to wildlife.

Page 4.3-2, second paragraph

...The majority of the vegetation on the UCLA campus consists of nonnative rather than native species, and ~~all-most~~ of the vegetation has been introduced along with the development of buildings...Stone Canyon Creek, the only area on campus in which wetlands are considered possible, would not be characterized as a federally protected wetland, because less than 50 percent of the dominant plant species at the site were rated as facultative or obligate ~~due to the lack of plants characterized as hydrophytic~~ according to the *National List of Plant Species That Occur in Wetlands* (U.S. Fish and Wildlife Service, 1988), which is one of three mandatory criteria to designate an area as a jurisdictional wetland (U.S. Fish and Wildlife Service, 1988; refer also to Appendix 5, Tables A5-1A and A5-1B).

Pages 4.3-16, first paragraph

Hickman, James C., ed. Jepson. 1993. The Jepson Manual:—Higher Plants of California. University of California: Berkeley.

Section 4.9 (Noise and Vibration)

Pages 4.9-11, Table 4.9-5 (Existing Roadway Noise Levels Off Campus—Regular Session)

Hilgard Avenue, Wyton Drive to Westholme Avenue	<u>Single- and Multi-Family</u>	63.6
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Page 4.9-13, Table 4.9-6 (Existing Roadway Noise Levels Off Campus—Summer Session)

Hilgard Avenue, Wyton Drive to Westholme Avenue	<u>Single- and Multi-Family</u>	63.4
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Section 4.13 (Transportation/Traffic)

Page 4.13-5, seventh paragraph

- *Tiverton Avenue*—A short secondary ~~roadway~~ highway running between Lindbrook Drive and Le Conte Avenue with on-street parking allowed on both sides of the street. North of Le Conte

Avenue, the roadway enters the UCLA campus and becomes Tiverton Drive. Parking is provided on both sides of the street.

Page 4.13-18, first paragraph

In addition, the campus currently operates a pilot transit fare subsidy program entitled "BruinGo." UCLA and the Santa Monica Municipal Bus Lines launched the program at the beginning of academic year 2000-01 to provide ~~fare-free~~subsidized bus travel to UCLA students, faculty, and staff on the "Big Blue Bus" upon presentation of a Bruin ID card. Although the campus continues to analyze the effectiveness of BruinGo within the context of the overall campus TDM program, the BruinGo pilot program has been extended for the 2002-03 academic year, through the spring quarter of 2003.

Page 4.13-18, before last paragraph

To further enhance bicycling as a TDM alternative, the campus will prepare a bicycle long range plan.

MM 4.13-0 The campus shall develop a bicycle long range plan.

Page 4.13-69, Subheading "Intersection No. 14—Montana Avenue and Levering Avenue"

This intersection is currently STOP sign controlled for the southbound and northbound approaches. Refer to the discussion under Impact 4.13-1, above, for a discussion of potential mitigation options at this intersection. No feasible mitigation measures have been identified for this intersection.

Page 4.13-76, fourth paragraph

MM 4.13-2(p) If the City of Los Angeles elects not to install ATCS at the intersection of Beverly Glen Boulevard and Greendale Drive, the campus shall provide fair share funding for restriping the west side of Beverly Glen Boulevard by the City of Los Angeles to provide dedicated ~~northbound and southbound~~ through and left/right-turn lanes.

Page 4.13-77, first three paragraphs

In addition, restriping has been identified at the following intersection:

- 40. Wilshire Boulevard and Malcolm Avenue (P.M. peak)

With installation of ATCS at 12 intersections and the proposed restriping at one additional intersection, the impact of implementation of the 2002 LRDP during the summer session would be mitigated to a less-than-significant level at all 13 intersections.

No feasible mitigation measures are available at the following 12 intersections:

- 1. Church Lane/Ovada Place and Sepulveda Boulevard (P.M. peak)
- 3. Sunset Boulevard and Church Lane (P.M. peak)
- 5. Sunset Boulevard and Veteran Avenue (A.M. and P.M. peak)
- 6. Sunset Boulevard and Bellagio Way (A.M. and P.M. peak)
- 9. Sunset Boulevard and Hilgard Avenue/Copa De Oro Road (A.M. and P.M. peak)
- 10. Sunset Boulevard and Beverly Glen Boulevard/Bel Air Road (~~A.M. and~~ P.M. peak)
- 11. Sunset Boulevard (East I/S) and Beverly Glen Boulevard (A.M. and P.M. peak)
- 14. Montana Avenue and Levering Avenue (A.M. and P.M. peak)
- 15. Montana Avenue/Gayley Avenue and Veteran Avenue (A.M. and P.M. peak)
- 35. Wilshire Boulevard and Sepulveda Boulevard (A.M. peak)

36. Wilshire Boulevard and Veteran Avenue (A.M. and P.M. peak)

37. Wilshire Boulevard and Gayley Avenue (P.M. peak)

57. Beverly Glen Boulevard and Mulholland Drive (A.M. peak)

Chapter 6 (Alternatives)

Pages 6-4, 6.2.4 (No Project/Reduced Enrollment Alternative), first paragraph

...The campus population levels would remain at the levels indicated by Table 4.10-3 (Existing Campus Population—Regular Session) and Table 4.10-34 (Existing Campus Population—Summer Session)....

Pages 6-6 to 6-7, Subheading "Description"

...Under this alternative, the NHIP would not occur, as that proposal is not consistent with the 1990 LRDP, and no additional growth in summer session enrollment would be accommodated beyond ~~current 2000~~ levels. Because the population growth would be limited to the levels identified in the 1990 LRDP and 1990 LRDP Final LRDP as amended and the additional enrollment under the 2002 LRDP would not occur, this alternative also serves as a reduced population alternative.

Page 6-8, first two paragraphs

...While Alternative 1 would result in an estimated trip generation ~~that is essentially the same as~~ generally similar to that under the 2002 LRDP, more trips would be generated by faculty and staff and fewer trips would be generated by commuter students under the alternative. This is because the parking inventory limits are the same for both the alternative and the project, but the parking space allocation would be different due to the lower number of on-campus student residents under this alternative.

The 2002 LRDP developed two construction scenarios to allow a conservative analysis of traffic, air quality, and noise impacts during peak construction activity periods. Both of these scenarios used the NHIP as a representative construction project. ~~While Because~~ the NHIP would not be constructed as part of this alternative, construction activities under Alternative 1 would be ~~similar to less than~~ those of the 2002 LRDP since although the same overall amount of development would occur, ~~and another~~ construction project, or combination of projects, ~~could would not~~ result in similar construction impacts because the 2002 LRDP analysis indicated that the NHIP would be the largest project developed under the LRDP. As such, Nevertheless, the net increase in daily construction emissions would still likely exceed daily thresholds recommended by the South Coast Air Quality Management District (SCAQMD) and construction under Alternative 1 would contribute substantially to an existing or projected air quality violation during peak periods and the potential impact would be significant. Following MM 4.2-2(a), MM 4.2-2(b), and PP 4.2-2(a) through PP 4.2-2(c) ensures that construction related air quality impacts are minimized. They would not, however, reduce the net increase in peak construction activities to below the thresholds of significance recommended by the SCAQMD. Therefore, the construction air quality impact ~~would be of Alternative 1 would be less than that of the 2002 LRDP, but still significant and unavoidable under both the 2002 LRDP and Alternative 1.~~

Page 6-10, second and third paragraphs

Implementation of the 2002 LRDP would not expose sensitive receptors near roadway intersections to substantial pollutant concentrations. Alternative 1 would generate ~~less similar~~ vehicular traffic to and from the campus ~~than~~ under the 2002 LRDP, and localized concentrations of carbon monoxide (CO) would be ~~incrementally lower the same during the regular session, but slightly lower during the summer session~~ under this alternative. The resulting impact would remain less than significant under either development scenario.

~~Neither the 2002 LRDP or Alternative 1 would slightly increase the demand for public transit service to and from the UCLA campus due to the fact that the NHIP would not be built. Therefore, neither development scenario. However, this increase would be incremental, as less campus population growth would occur under the alternative than under the 2002 LRDP, and thus would expose not result in the exposure of sensitive receptors near roadway intersections to substantial pollutant concentrations due to increased bus activity.~~

Page 6-11, Subheading “Noise and Vibration,” second and third paragraphs

Construction activities under Alternative 1 or the 2002 LRDP that occur in close proximity to existing buildings at the campus could generate and expose persons on-campus to excessive groundborne vibration or groundborne noise levels and would result in a significant and unavoidable impact. However, as Alternative 1 would not involve the construction of the NHIP (which the LRDP analysis indicated would generate the greatest amount of construction impacts under the LRDP), vibration impacts from construction would be less than those of the proposed project. Groundborne vibration from construction activities would not significantly impact off-campus locations under either development scenario. When construction activities are not occurring at the campus, background operational vibration levels would be expected to be very low and not noticeable. This would occur under the 2002 LRDP or Alternative 1, and operational impacts would be less than significant.

Alternative 1 would generate a slightly reduced similar amount of daily vehicular traffic ~~than compared to the 2002 LRDP during the regular session and slightly less traffic during the summer sessions session.~~ Therefore, roadway noise impacts would be equal to or slightly less with this Alternative and a less-than-significant impact would occur under both development scenarios.

Page 6-11, Subheading “Noise and Vibration,” fifth paragraph

~~Construction activities under Alternative 1 would be similar to those of the 2002 LRDP. As such, construction noise levels could substantially increase existing noise levels at on-campus or off-campus locations under either development scenario Alternative 1. Following PP 4.9-8(a) through PP 4.9-8(d) and PP 4.9-9 minimizes construction noise impacts to these locations. They would not, however, ensure that noise levels do not increase by less than 10 dBA at noise sensitive uses located in close proximity to the construction sites. However, as Alternative 1 would not involve the construction of the NHIP (which the LRDP analysis indicated would generate the greatest amount of construction impacts under the LRDP), noise impacts from construction would be less than those from the proposed project. Therefore, this impact would be significant and unavoidable under either the 2002 LRDP or Alternative 1, but to a lesser extent.~~

Page 6-12, Subheading “Police Services,” second paragraph

Based upon an anticipated average weekday campus population of 58,420 in 2010–11 for this alternative, the provision of between 41 and 93 sworn officers would continue to serve the campus population at the same within the level of service documented for other UC campuses (assuming a ratio of between 0.7 and 1.6 sworn officers per 1,000 population). The campus currently provides 60 sworn officers, as well as CSOs and parking patrol officers, which is well within the University-wide range to serve the campus under full implementation of the 2002 LRDP Alternative 1. The campus monitors police staffing levels on an ongoing basis as individual development projects are proposed, and on an annual basis as part of the campus budgeting process to ensure that adequate police protection continues to be provided.

Page 6-15, first paragraph

Alternative 1 would result in an estimated trip generation that is ~~essentially the same as under the 2002 LRDP similar to that generated by the 2002 LRDP during the regular session, and slightly less than that generated during the summer session.~~ (Although more the same trips would be generated by faculty and staff, compared to the 2002 LRDP, fewer more trips would be generated by commuter students.)

Because trip generation would be ~~the same~~ similar, regular session traffic impacts would be ~~the same as under similar to the 2002 LRDP~~, and would ~~result in~~ be significant and unavoidable ~~traffic impacts~~.

Pages 6-16 to 6-17, first and second paragraphs

Although ~~no little~~ growth in summer session enrollment would occur under Alternative 1, faculty, staff and visitors would increase as a result of future development, which would result in an increase in summer session traffic as compared to existing conditions. Future vehicle trip generation in the summer would be approximately ~~4,836-1,566~~ daily trips less for Alternative 1 than under the 2002 LRDP, but significant impacts would still occur, but at fewer intersections.

As described in the air quality discussion for Alternative 1, ~~while 2002 LRDP analysis indicated that the construction of the NHIP would represent a worst case scenario. As the NHIP would not be constructed as part of this alternative, construction activities under Alternative 1 would be similar to less than those of the 2002 LRDP since the same overall amount of development would occur, and another since a construction project, or combination of projects, could that may occur under Alternative 1 would not result in similar construction impacts compared to those estimated for the NHIP. Therefore, under Alternative 1, impacts associated with construction trips would be the same as less than those with the 2002 LRDP, and but still~~ would be significant and unavoidable at some locations. Because overall trip generation would be ~~the same as with~~ similar to that of the 2002 LRDP, impacts on roadways designated by the Los Angeles County Congestion Management Program would be the same as with the 2002 LRDP, and would be less than significant. As with the 2002 LRDP, implementation or construction of Alternative 1 would not substantially increase design hazards due to design features or incompatible land uses. Implementation and construction of Alternative 1 would not result in inadequate emergency access, as with the 2002 LRDP, and impacts would be less than significant.

Page 6-20, Subheading "Aesthetics," first paragraph

...Because the project would fundamentally change the visual character of the site, this impact would be greater than the proposed project's less-than-significant impact, ~~but it would remain less than and would be~~ significant.

Page 6-21, third paragraph

...According to the Playa Vista Area Specific Plan, the site is currently zoned for commercial, manufacturing, and residential uses. Therefore, this alternative, with its components of academic, housing, and ~~ereational-recreational~~ recreational uses, would in all probability be visually compatible with the surrounding mixed-use neighborhood....

Page 6-23, second paragraph

Implementation of the 2002 LRDP would not expose sensitive receptors near roadway intersections to substantial pollutant concentrations. Similarly, Alternative 2 is not expected to significantly impact sensitive receptors in the vicinity of Playa Vista, since traffic conditions would be ~~similar to~~ better than those around the UCLA campus. The resulting impact would remain less than significant under either development scenario.

Page 6-24, Subheading "Cultural Resources," third paragraph

~~Similar to the campus, there~~ There are ~~also~~ known paleontological resources, including alluvium rock units and potential fossiliferous rock units, on the Playa Vista site, and potentially significant impacts could occur due to construction activities that could damage or destroy previously unknown paleontological resources....

Page 6-27, third and fourth paragraphs

During construction and operation of this alternative, building occupants and construction workers could be exposed to contaminated soil or groundwater, particularly if the alternative site contains old oil fields or abandoned dumps from previous industrial uses on the site. ~~Since information pertaining to hazardous materials on the Playa Vista site is not available, it is assumed that~~ Because methane contamination has been detected at varying concentrations across the Playa Vista property, development of this alternative could result in construction of facilities on sites containing hazardous materials, particularly given the previous uses of the site (i.e., construction and storage of airplanes). Incorporation of PP 4.6-1 and 4.6-4, which require specific procedures to be implemented in the event that contaminated soil or groundwater is discovered, and compliance with federal, State, and local regulations, would ensure that this impact would be less than significant. However, given the previous uses of the site, this impact could be greater than the less-than-significant impacts under the 2002 LRDP.

Implementation of this alternative ~~could~~ would not result in hazardous emissions, ~~or but could~~ require the handling of ~~significant amounts of~~ hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, depending on the location of the satellite campus relative to the proposed elementary school. While hazardous materials and waste could be handled within one-quarter mile of an existing or proposed school as a result of implementation of this alternative, these materials would not exist in quantities significant enough to pose a risk to occupants of the school or the campus community. As noted above, no laboratories would be ~~included in developed on~~ this alternative site, and the types and quantities of hazardous chemicals used would not present a significant hazard to either the satellite campus or adjacent uses. ~~In Additional laboratories could be provided on the campus; however, in~~ any event, the campus would continue to comply with the provisions of Section 15186 of the *CEQA Guidelines*, as it applies to any future development, which requires that the campus consult with the affected school district regarding the potential impact of the project when circulating the environmental document, and notify the affected school district in writing prior to approval and certification of the environmental document. This impact would be considered less than significant, the same as the less-than-significant impact identified under the 2002 LRDP.

Page 6-28, first paragraph

~~It is unknown whether portions of the alternative site are included on any lists of materials sites compiled pursuant to Government Code Section 65962.5 that could create a significant hazard to the public or the environment. Since a records search for existing sites containing hazardous materials was not available for the Playa Vista site, it is assumed that~~ As described above, development of this alternative could result in construction of facilities on sites containing hazardous materials especially related to prior industrial uses. ~~As noted above, prior to development, a records search that identifies contaminated sites compiled by federal, State, and local agencies would be performed such that the extent of Methane contamination, if any, would be identified and remediated prior to construction. Therefore, as with the 2002 LRDP,~~ this impact would be less than significant.

Page 6-28, third paragraph

During construction of Alternative 2, activities ~~could~~ would not physically interfere with an adopted emergency response or emergency evacuation plan. Similar to the proposed project, ~~mitigation would be recommended that would require~~ at least one unobstructed lane ~~to~~ would be maintained in each direction at all time within the construction area, ~~and or~~ appropriate signage indicating alternative travel routes would be provided in the event of complete roadway closure. In addition, UCLA would be required to consult with the local police, fire, and emergency service providers in the vicinity to disclose temporary lane or roadway closures and alternative travel routes. Impacts under this alternative would be the same as under the 2002 LRDP, and would be less than significant.

Page 6-29, second paragraph

...With implementation of best management practices to minimize runoff, this impact would be less than significant. Since the implementation of Alternative 2 would require an NPDES permit for construction activities, this increased runoff would not violate any existing water quality standards or waste discharge requirements, or otherwise substantially degrade water quality. Therefore, impacts ~~related to this impact under Alternative 2~~ would be less than significant, ~~and the same as although slightly greater than~~ under the proposed project.

Page 6-29, fourth paragraph

~~Since the~~ ~~The~~ increase in impervious surfaces at the Playa Vista site relative to the increase under the 2002 LRDP would be ~~greater, impacts to groundwater recharge would also be greater than under the proposed project. However, greater; however,~~ the Playa Vista site is not designated as a groundwater recharge area and, therefore, impacts would be less than significant, and the same as under the proposed project.

Page 6-30, first paragraph

...Development of this alternative ~~could~~ ~~would~~ alter site drainage patterns, but would not result in localized flooding either on or off site or exceed capacities of existing storm drain system. With the incorporation of the recommended programs, practices, and procedures, impacts would be less than significant, as with the 2002 LRDP.

Page 6-31, first paragraph

Implementation of Alternative 2 could result in land use impacts related to building intensity and compatibility with the adjacent uses of Playa Vista Phase I and Marina del Rey and could adversely affect the biologically sensitive resources in the area. It is assumed that design solutions and appropriate siting of the campus buildings, housing, recreation, and parking would mitigate land use impacts ~~but possibly to a lesser-greater extent than with the proposed project's less-than-significant impact.~~ Additionally, development of this alternative would be subject to applicable land use plans, policies, and/or regulations of an agency with jurisdiction over the Playa Vista site. It is assumed that implementation of this alternative would be consistent with the goals and policies of the Southern California Association of Governments Regional Comprehensive Plan and Guide, the Regional Water Quality Control Board's Water Quality Control Plan, and the South Coast Air Quality Management District's Air Quality Management Plan. Therefore, land use impacts under this alternative would be less than significant ~~but to a lesser degree than and less than those of the proposed project.~~

Page 6-32, second paragraph

Alternative 2 could increase the future roadway noise levels around the Playa Vista site, since additional population would be introduced. As the Playa Vista site is primarily undeveloped, and substantial roadway improvements would be implemented, intersections in the vicinity of this site would be anticipated to operate at acceptable levels of service, resulting in a less-than-significant impact to local traffic volumes and associated noise. Following PP 4.9-5(a) and PP 4.9-5(b) and MM 4.9-6, which call for provision of on-campus housing and continuation of the TDM program, this impact would remain less than significant by reducing trip generation during both regular and summer sessions to the maximum extent feasible. On-campus housing reduces the number of people that otherwise would need to commute to and from the campus to attend class. The TDM program reduces the number of motor vehicle trips for campus employees. Because streets in the vicinity of the main campus are congested, and streets in the vicinity of the Playa Vista site is primarily undeveloped function at acceptable levels of service, and has committed to significant street improvements would be implemented as conditions of approval, the impact of increased traffic volumes in the Playa Vista area would be less than significant and reduced in magnitude as compared to the 2002 LRDP.

Page 6-33, Subheading "Population and Housing," second paragraph

...Population and employment impacts would increase in the Playa Vista area and would ~~decrease-be decreased~~ at the existing UCLA campus, which would have fewer students, staff, and faculty than under the 2002 LRDP. Since 2,000 beds of graduate housing would be provided on site under this alternative, there would be no substantially increased demand for housing in the Playa Vista area. Just as with the proposed project, a less-than-significant impact under this alternative would occur.

Page 6-34, second paragraph

...Assuming the same employee distribution patterns as for the main campus, given the satellite campus' close proximity, a large portion would be expected to locate in the City of Los Angeles, particularly in neighborhoods on the Westside and possibly in the South Bay area. A small proportion would reside in other Los Angeles County cities or other areas outside Los Angeles County.

Page 6-35, Subheading "Police Services"

...The UCPD would supply campus officers and CSOs to the satellite campus in the same staffing ratio as currently exists on campus; these officers and CSOs would be relocated from the main campus and would not result in additional staffing. Therefore, impacts on police services under this alternative would be the same as under the proposed project, ~~or-and~~ less than significant.

Page 6-37, first and second paragraphs

...The First Phase project of Playa Vista would increase traffic volumes on the I-405 Freeway, which is projected to be at LOS F with or without the Playa Vista First Phase Project. Impacts associated with traffic would be significant, but reduced compared to the proposed project.

During construction of this alternative, short-term generation of construction-related vehicle trips could temporarily impact traffic conditions along roadway segments and at individual intersections, and impair emergency access during the short term. However, because the area is primarily undeveloped, and much of the construction staging and internal access would occur on site, construction-related traffic impacts ~~would be anticipated to be less~~ could be greater than the proposed project because additional infrastructure would be required at this site. ~~While construction~~ Construction impacts could remain significant and unavoidable, and the degree of significance would be ~~less-greater~~ than the proposed project.

Pages 6-37 to 6-38, Subheading "Utilities and Service Systems"

...Projected water use would be substantially the same for the alternative site as if the relocated programs remained on the main campus. LADWP has identified that sufficient water supplies exist to adequately serve the 2002 LRDP, and this would be true on the alternative site as well. However, this alternative would require the extension of water infrastructure to serve the site. The impact would, therefore, be significant, and greater than that of the proposed project.

Page 6-38, fourth and fifth paragraphs

Implementation of this alternative would not generate wastewater that would exceed the capacity of the HTP wastewater treatment system in conjunction with the provider's existing service commitments. The wastewater generated would be the same as under the proposed project. Therefore, the impact of this alternative on wastewater treatment capacity would be the same as for the proposed project, or less than significant. However, this alternative would require or result in the expansion or development of infrastructure to serve the site, and would result in a significant impact, greater than that of the proposed project.

With regard to energy use, because the alternative site would not be connected to the ESF/cogeneration facility and the chiller plant, less efficient use of electricity and natural gas would be anticipated to occur. Continued implementation of campus conservation measures would reduce this

impact to a less-than-significant level. DWP has indicated that sufficient electricity supplies exist to serve the increase in development and population under the 2002 LRDP; therefore, it is assumed DWP could also serve the same development and population on a different site. Although sufficient supplies exist, because the satellite campus would not have the benefit of the cogeneration facility to reduce reliance on outside electricity sources, the net demand for electricity from the DWP would be greater than with the proposed project. Since supplies are adequate, this impact would be less than significant, ~~but and~~ would be ~~greater than~~ similar to the less-than-significant impact on electricity demand identified in the 2002 LRDP.

Pages 6-40, first paragraph

In addition, this alternative would result in greater impacts than under the proposed project in the issue areas of aesthetics; construction-related air quality, traffic, and noise; biological resources; cultural resources; geology; hazards; hydrology; ~~land use and planning~~; public services (schools); and utilities and service systems.

Page 6-40, third paragraph

For these reasons, the development of future facilities on a site other than the main campus is undesirable and impractical. The general impacts of pursuing such an alternative on instructional and research program objectives, together with the potential for increased operational costs, weighs ~~decisively~~ against the establishment of a satellite campus.

Page 6-44, Subheading "Noise and Vibration," second paragraph

Construction activities under Alternative 3 or the 2002 LRDP that occur in close proximity to existing buildings at the campus could generate and expose persons on-campus to excessive groundborne vibration or groundborne noise levels, ~~while off-campus and, therefore, would be significant and unavoidable under either development scenario.~~ Off-campus sensitive uses would not be significantly impacted. When construction activities are not occurring at the campus, background operational vibration levels would be expected to be very low and not noticeable. This would occur under the 2002 LRDP or Alternative 3.

Page 6-46, first paragraph

...This would be a ~~potentially~~ significant impact with no feasible mitigation available. Compared to the less-than-significant impacts on student housing demand of the 2002 LRDP, Alternative 3 would result in greater impacts than the 2002 LRDP.

Page 6-49, first paragraph

...Four intersections could be significantly impacted by traffic during the summer session. For a more detailed discussion, see Volume II of this DEIR. Similar to the proposed project, significant and unavoidable impacts would occur at four intersections under this alternative. Additionally, parking impacts under this alternative would be greater during the regular session when compared to the ~~project's less-than-significant proposed project, which would have no impact.~~

Page 6-49, third and fourth paragraphs

Development under this alternative would result in additional vehicular traffic volumes during the regular session that may exceed established service levels on roadways designated by the Los Angeles Congestion Management Program. In addition, this alternative would not result in hazards due to design features or incompatibilities, nor impair emergency access in the long term. Construction activities could result in vehicular hazards due to closure of traffic lanes or roadway segments, ~~and but~~ would not impair emergency access during the short-term under this alternative with the continuation of campus PPs that require the maintenance of an open lane, and traffic direction assistance, where

necessary. Development of this alternative would result in the same less-than-significant impacts compared to the proposed project.

Overall, implementation of this alternative would result in greater ~~(operational and parking)~~ impacts during the regular session, and lesser impacts during summer, when compared to the proposed project. However, traffic ~~and parking~~ impacts would still be significant and unavoidable as for the proposed project.

Page 6-50, Section 6.3.4 (Environmentally Superior Alternative), second paragraph

For this project, the No Project alternative (Alternative 1) would reduce all project impacts, but significant and unavoidable impacts would remain. While Alternative 1 would be considered the environmentally superior alternative, a majority of the project objectives would not be achieved it is the No Project Alternative, and thus cannot be designated as the environmentally superior alternative. Of the other alternatives considered, Alternative 3 reduces the significant and unavoidable operational air quality impact during the twelve-week summer session to a less-than-significant level, but results in an increase in the severity of the significant and unavoidable operational traffic and parking impacts during the regular session. Alternative 3 also results in an increase in student housing demand during the regular session compared to the proposed project. However, compared to Alternative 2 overall, Alternative 3 would be considered the environmentally superior alternative.

Page 6-51, Table 6-7 (Comparison of Alternatives to the Proposed Project)

Table 6-7 Comparison of Alternatives to the Proposed Project			
<i>Impact Area</i>	<i>Alternative 1 No Project/ Continued Implementation of the 1990 LRDP Through 2010-11</i>	<i>Alternative 2 Off-Site Alternative</i>	<i>Alternative 3 Regular Session Growth Only</i>
Aesthetics	LS (Same)	LSSU (Greater)	LS (Same)
Air Quality—Construction	SU (Same)(Less)	LSSU (Greater)	SU (Same)
Air Quality—Operation	SU (Less)	SU (Same)	SU LS (Less)
Biological Resources	LS (Same)	LS (Greater)	LS (Same)
Cultural Resources	LS (Same)	LS (Greater)	LS (Same)
Geology and Soils	LS (Same)	LS (Greater)	LS (Same)
Hazards and Hazardous Materials	LS (Same)	LS (Same)(Greater)	LS (Same)
Hydrology and Water Quality	LS (Same)	LS (Greater)	LS (Same)
Land Use and Planning	LS (Same)	LS (Greater)(Less)	LS (Same)
Noise—Construction	SU (Same)(Less)	SU (Greater)	SU (Same)
Noise—Operation	LS (Less)	LS (Same)	LS (Same)
Population and Housing	LS (Same)	LS (Same)	LS (Greater)
Public Services	LS (Less)	LS (Greater)	LS (Same)
Recreation	LS (Less)	LS (Same)	LS (Same)
Transportation—Construction	SU (Same)(Less)	SU (Less)(Greater)	SU (Same)
Transportation—Operation	SU (Less)	SU (Less)	SU (Greater)
Utilities and Service Systems	LS (Same)	LSSU (Greater)	LS (Same)
Relationship to objectives	Less	Less	Less

LS = Less Than Significant
 PS = Potentially Significant
 S = Significant
 SU = Significant and Unavoidable

Chapter 8 (References)

Page 8-3, fifth paragraph

Hickman, James C., ed. Jepson. 1993. The Jepson Manual:—Higher Plants of California. University of California: Berkeley.

2. Volume 2

Chapter 2 (Summary of Environmental Impacts and Mitigation Measures)

Page 2-4, Subheading “Transportation/Traffic”

- Operational impacts resulting from an increase in vehicular trips during the twelve-week summer session at ~~one intersection in the A.M. peak hour, one intersection in the P.M. peak hour, and two intersections in~~ (during both the A.M. and P.M. peak hours)
- Construction impacts resulting from truck trips

If the City of Los Angeles does not implement all feasible mitigation measures identified in the 2002 NHIP Draft EIR, then impacts could remain significant and unavoidable at four intersections (one in the A.M. peak hour, one in the P.M. peak hour, and two in both the A.M. and P.M. peak hours) during the twelve-week period of summer instruction.

Page 2-39, Table 2-1, first row, second column, before first paragraph

MM 4.13-0 The campus shall develop a bicycle long range plan.

Page 2-47, Table 2-2 (Comparison of Alternatives to the Proposed Project)

Table 2-2 Comparison of Alternatives to the Proposed Project		
Impact Area	Alternative 1: No Project	Alternative 2: Alternative Site
Aesthetics	LS (Same)	LS (Same)
Air Quality—Construction	SU (Same) (Less)	SU (Greater)
Air Quality—Operation	LS (Greater)	LS (Same)
Biological Resources	LS (Less)	LS (Less)
Cultural Resources	LS (Greater)	LS (Same)
Geology and Soils	LS (Greater) (Same)	LS (Same) (Greater)
Hazards and Hazardous Materials	LS (Greater)	LS (Same) (Greater)
Hydrology and Water Quality	LS (Same) (Less)	LS (Less) (Same)
Land Use and Planning	LS (Same)	LS SU (Greater)
Noise—Construction	SU (Same)	SU LS (Less)
Noise—Operation	LS (Same)	LS (Less)
Population/Housing	LS (Greater)	LS (Same)
Public Service	LS (Same)	LS (Same)
Recreation	LS (Greater)	LS (Greater)
Transportation—Construction	SU (Same) (Less)	SU (Greater)
Transportation—Operation	SU (Greater)	SU (Greater) (Less)
Utilities and Service Systems	LS (Same)	LS (Greater)
Relationship to Project Objectives	Less	Less

LS = Less Than Significant
 PS = Potentially Significant
 S = Significant
 SU = Significant and Unavoidable

Chapter 3 (Project Description)

Page 3-22, Section 3.4.4 (Project Construction Components), fourth bullet

- Design and construction of the Recreation Facilities and Facilities Management replacement storage building

Section 4.3 (Biological Resources)

Page 4.3-14, Section 4.3.5 (References), sixth paragraph

Hickman, James C., ed. Jepson. 1993. The Jepson Manual:—Higher Plants of California. University of California: Berkeley.

Section 4.13 (Transportation/Traffic)

Page 4.13-18, Subheading “2002 LRDP EIR Mitigation Measures and/or Campus Programs, Practices, and Procedures That Have Been Incorporated into the Proposed Project,” following first paragraph

2002 LRDP EIR MM 4.13-0 The campus shall develop a bicycle long range plan.

Chapter 6 (Alternatives)

Page 6-4, first paragraph

...The amount of reduction necessary in the size of the project to substantially reduce these construction-related effects would render the project infeasible, and would also increase ~~in~~ regular-session operational traffic impacts, which were not significant under the proposed project, as fewer beds would be provided to reduce vehicle trips and vehicle miles traveled by students. Although the proposed project would result in significant operational traffic impacts during the summer session, a slight reduction in the provision of housing would not substantially reduce the number of conference attendees anticipated with the proposed project, and no substantial reduction in the significance of the operational traffic impact of the project during the twelve-week summer session would occur. Further, ~~because~~ this project does not make the most efficient use of land resources in the Northwest zone ~~the construction of additional residential structure would be necessary to provide the bed count planned under proposed project. The amount of additional construction would increase as the number of beds is decreased in this alternative to achieve substantial reductions in construction impacts.~~ Therefore, for all of the above reasons, this alternative was rejected as infeasible.

Page 6-4, Section 6.2.3 (Increased Housing Alternative), first paragraph

...However, as discussed in Section 4.13 (Transportation/Traffic), there are no significant intersection impacts during the regular session; therefore, this alternative would not achieve the primary goal of the ~~alternative~~ alternatives analysis, which is to avoid or substantially lessen any of the significant effects of the project (in this case, traffic impacts)....

Page 6-5, Section 6.3.1 (Alternative I—No Project Alternative), second paragraph

...Not constructing the NHIP would substantially impede the University's ability to address the housing needs of the increase in student enrollment that would occur under the 2002 LRDP; meet the goals of guaranteeing housing goals articulated in the ~~2002~~ 2001 SHMP, including a reduction in triple-occupancy accommodations; and continue the progress made to date in transforming UCLA to a residential campus, it also would not achieve reductions in vehicle miles traveled, trip generation, or parking demand.

Pages 6-6 to 6-7, Subheading "Air Quality," first paragraph

Construction activities for the NHIP could contribute substantially to an existing or projected air quality violation. This is considered a significant and unavoidable impact. Under the No Project alternative, the construction activities would simply occur elsewhere within the UCLA campus as the 550,000 gsf dedicated to the development of housing in the Northwest zone would be reallocated for academic and support uses among the other campus zones. ~~The~~ Although the same overall construction activities would still occur, and this impact would remain significant and unavoidable under Alternative 2 these activities would not occur simultaneously as under the NHIP. Consequently, the significant and unavoidable impact of Alternative 2 would be less than that of the proposed project.

Page 6-7, fourth paragraph

During the summer session, Alternative 1 would result in ~~slightly fewer the same number of~~ employees during the summer, and no additional conference attendees, compared to the proposed project. ~~However, while vehicular~~ Vehicular trips during the summer session would thus be reduced under this alternative, which would result in lower daily ~~operational vehicular~~ emissions than the proposed project during the summer session, ~~the operational traffic impact during the summer would remain significant and unavoidable, the same as under the proposed project.~~ As with the proposed project, operational emissions during the regular and summer sessions would remain less than significant under Alternative 1, although to a slightly lesser extent.

Page 6-8, second paragraph

~~Although a~~ the same overall amount of development would occur under Alternative 1, more educational space would be constructed. This educational and laboratory space has the potential to generate slightly greater amounts of toxic air contaminants than the residential uses proposed under the NHIP. Although this impact is expected to remain less than significant under Alternative 1, the potential impact is potentially greater than under the NHIP, which was also less than significant.

Pages 6-9 to 6-10, Subheading "Geology and Soils," first paragraph

Because no construction of residential uses would occur under the No Project alternative, 1,675 net new additional students and 249 new staff (of which 35 are students) would not be ~~housed present~~ on campus and would not be exposed to adverse effects from or associated with seismic groundshaking. However, development of 550,000 sf of academic or academic support uses would still occur under this alternative in campus zones other than the Northwest zone. As no portion of the campus has been designated as a seismic hazard zone under the Alquist-Priolo Earthquake Fault Zoning Act of 1994, and no known active or potentially active faults are known on campus, development under this alternative would not be subject to a substantial risk of fault (ground surface) ruptures. However, while the proposed project site has not been designated as a potential liquefaction or landsliding hazard area by the CDMG, portions of the Southwest zone have been designated as potential liquefaction hazard areas, and risks of developing on these sites may be slightly greater than under the proposed project. However, any development on campus (including this alternative) would be required to follow applicable 2002 LRDP EIR PPs related to geology, which require a project-specific geotechnical assessment and development of design recommendations by a Certified Engineering Geologist or a Licensed Geotechnical Engineer. Further, all development on campus would be required to comply with Chapter 23 of the CBC or with requirements for Zone 4 of the UBC, whichever is more stringent, as well as the Seismic Hazards Mapping Act, University Policy on Seismic Safety, and structural peer review. As with the proposed project, following these 2002 LRDP EIR PPs would ensure that development and operation of the No Project alternative would not result in a significant impact related to the exposure of people or structures to potentially substantial adverse effects involving fault rupture, groundshaking, seismic-related ground failure, including liquefaction, or landslides. ~~However, this alternative would have a slightly greater less than significant impact than the~~

~~proposed project, as development under this alternative could occur within a potential hazard zone. This alternative would have a less than significant impact, the same as the proposed project.~~

Pages 6-10 to 6-11, third paragraph

As described in Section 4.5 (Geology and Soils) of this Volume, the proposed project is located on stable soils that are not subject to significant differential settlement or expansion and are not considered to be subject to liquefaction or landsliding, and impacts related to development on unstable soils are considered to be less than significant. Although development under this alternative could occur in areas that have been mapped by the CDMG as potentially subject to liquefaction (the Southwest zone), or on areas that may potentially contain expansive unstable soils, any development under the No Project alternative would be subject to the same 2002 LRDP EIR PPs and statutory and regulatory requirements related to geotechnical site investigation and building design as the proposed project (or any project under the 2002 LRDP, as discussed above) and would also, therefore, be less than significant, ~~but still slightly greater than under the proposed project to the same extent as the proposed project.~~

Page 6-14, first paragraph

...Also, the impacts of this alternative with respect to erosion and sedimentation would be the same as under the proposed project and would remain less than significant after following applicable 2002 LRDP EIR PPs and complying with all applicable NPDES requirements. Because this alternative would be subject to the same requirements and 2002 LRDP EIR PPs and MMs, and because less impermeable surfaces would be created, this alternative would not substantially increase surface runoff volume or velocity, or substantially alter site drainage patterns in a manner that would cause erosion or sedimentation, ~~and this impact would also be less than significant, the same as under the proposed project the less than significant impact of this alternative would be less than the proposed project.~~

Page 6-15, second paragraph

...Because, as described above, development under this alternative would likely result in the conversion of less permeable surface area to impermeable surface area, ~~the amount of conversion assumed to occur under the 2002 LRDP would not increase as a result of development under this alternative. Therefore, as with the NHIP, this alternative would have a less than significant impact on groundwater recharge this alternative would have a less than significant impact less than the proposed project.~~

Page 6-16, Subheading "Population and Housing"

...Consequently, population impacts would be the same as under the NHIP, and would be less than significant. However, there would continue to be an unmet demand for proximate and affordable student housing unless or until another housing development is proposed. Therefore, the No Project alternative would have a greater ~~and potentially significant~~ but less than significant housing impact on and off campus, compared to the less-than-significant housing impact ~~that~~ than is anticipated under the NHIP.

Page 6-17, Subheading "Transportation," second and third paragraphs

During the summer session, Alternative 1 would result in ~~slightly fewer~~ the same number of employees during the summer and no additional conference attendees, compared to the proposed project. Consequently, vehicular trips during the summer session would be reduced under this alternative. Consequently, the four significantly impacted intersections during the summer with project development would be less severely impacted under this alternative than the under the NHIP, but could still be significant.

Construction of the same gross square footage as under the NHIP would result in a similar amount of construction, which would generate a similar amount of construction traffic. As discussed in

Section 4.13 (Transportation/Traffic), construction traffic impacts would be significant and unavoidable for the NHIP and would be significant for the No Project alternative as well as the proposed project. As the 2002 LRDP EIR indicated that the construction impacts associated with the NHIP were the worst case scenario, the significant and unavoidable impact of this alternative will be less than those of the proposed project.

Page 6-23, Subheading "Geology and Soils," second paragraph

...Further, the project would be required to comply with applicable provisions of the statutes, regulations, and University policies, programs, practices, and procedures listed above. This impact would, therefore, be less than significant under this alternative, ~~though still slightly greater than the same as~~ under the proposed project.

Page 6-27, second paragraph

The site of Alternative 2 is immediately adjacent to high-density commercial uses. Uses specifically surrounding this site are primarily offices, parking, and public service uses along Wilshire Boulevard. In addition, residential uses are located within the project vicinity. The provision of four residential structures consisting of 2,000 beds under this alternative would not be functionally compatible with the adjacent commercial corridor, and this significant unavoidable impact would be greater than the proposed project's less-than-significant impact.

Page 6-28, third paragraph

Implementation of the NHIP would not cause a substantial permanent on- or off-campus increase in ambient noise levels in the project vicinity. This alternative would be implemented in an area with higher ambient noise levels due to activity at the proposed recreation facility. ~~The alternative would not include the recreation facility.~~ Therefore, this impact would be less than significant under either development scenario, but the impact of the alternative would be less than the proposed project.

Page 6-28, fifth paragraph

The NHIP construction could result in substantial temporary or periodic increases in ambient noise levels at on-campus locations. This is considered a significant impact. Implementation of Alternative 2 would eliminate this impact by relocating construction activities to an area that is not located adjacent to residential uses. The alternative project site, and the existing uses in the immediate vicinity, ~~is are~~ less sensitive to construction noise than the proposed project site. It is expected that construction activities at this location would not significantly impact any of the existing commercial and office uses in the vicinity.

Page 6-30, Subheading "Transportation," second paragraph

Alternative 2 would result in greater construction traffic impacts because the Lot 32 site is in close proximity to Wilshire Boulevard and Veteran and Gayley Avenues, and because excavation for the subterranean parking structure would generate additional truck trips to export soil. Thus, construction deliveries and potential lane closures would result in greater impacts than the proposed project's significant impacts because traffic flow on Wilshire, Veteran, or Gayley could be affected.

Page 6-33, Section 6.3.3 (Environmentally Superior Alternative)

Based on the information in this section, and as summarized in Table 6-1 (Comparison of Alternatives to the Proposed Project), ~~neither~~ the No Project Alternative would result in a reduction in significant impacts. ~~nor~~ However, the Alternative Site would not be environmentally superior to the proposed project, and neither of these alternatives ~~project~~ is fully consistent with the policies and goals of the 2002 LRDP, nor does either alternative meet the project objectives to the same degree as the proposed project.

As specified in the *CEQA Guidelines*, the EIR shall identify an environmentally superior alternative among the other alternatives. Although Alternative 1 (No Project) would result in a reduction in significant impacts compared to the proposed project, CEQA Guidelines Section 15126.6(e)(2) bars selection of Alternative 1 as the environmentally superior alternative. While the impacts of both Alternative 1 (No Project) and Alternative 2 (Alternative Site) would be greater than the project, Alternative 2 would result in an increase in severity of fewer of the project-identified impacts in comparison to Alternative 1. Therefore, Alternative 2 could ~~would~~ be considered the environmentally superior alternative, except that it is not environmentally superior to the proposed project. However, although not fully analyzed, the Reduced Project alternative described previously in Section 6.2.2 (Reduced Project Alternative), while not meeting the project objectives to the same degree as Alternative 2, would be considered ~~more~~ environmentally superior to either the proposed project or than Alternative 2 due to an incremental reduction in significant impacts. However, while the Reduced Project alternative could result in a marginal reduction of the project's significant environmental effects, they would still remain significant and unavoidable.

Page 6-34, Table 6-1 (Comparison of Alternatives to the Proposed Project)

Table 6-1 Comparison of Alternatives to the Proposed Project		
Impact Area	Alternative 1: No Project	Alternative 2: Alternative Site
Aesthetics	LS (Same)	LS (Same)
Air Quality—Construction	SU (Same)(Less)	SU (Greater)
Air Quality—Operation	LS (Greater)	LS (Same)
Biological Resources	LS (Less)	LS (Less)
Cultural Resources	LS (Greater)	LS (Same)
Geology and Soils	LS (Greater)(Same)	LS (Same)(Greater)
Hazards and Hazardous Materials	LS (Greater)	LS (Same)(Greater)
Hydrology and Water Quality	LS (Same)(Less)	LS (Less)(Same)
Land Use and Planning	LS (Same)	LS (Greater)
Noise—Construction	SU (Same)	SU (Less)
Noise—Operation	LS (Same)	LS (Less)
Population/Housing	LS (Greater)	LS (Same)
Public Service	LS (Same)	LS (Same)
Recreation	LS (Greater)	LS (Greater)
Transportation—Construction	SU (Same)(Less)	SU (Greater)
Transportation—Operation	SU (Greater)	SU (Greater)(Less)
Utilities and Service Systems	LS (Same)	LS (Greater)
Relationship to Project Objectives	Less	Less

LS = Less Than Significant
 PS = Potentially Significant
 S = Significant
 SU = Significant and Unavoidable

Chapter 8 (References)

Page 8-3, ninth paragraph

Hickman, James C., ed. Jepson: 1993. The Jepson Manual:—Higher Plants of California. University of California: Berkeley.

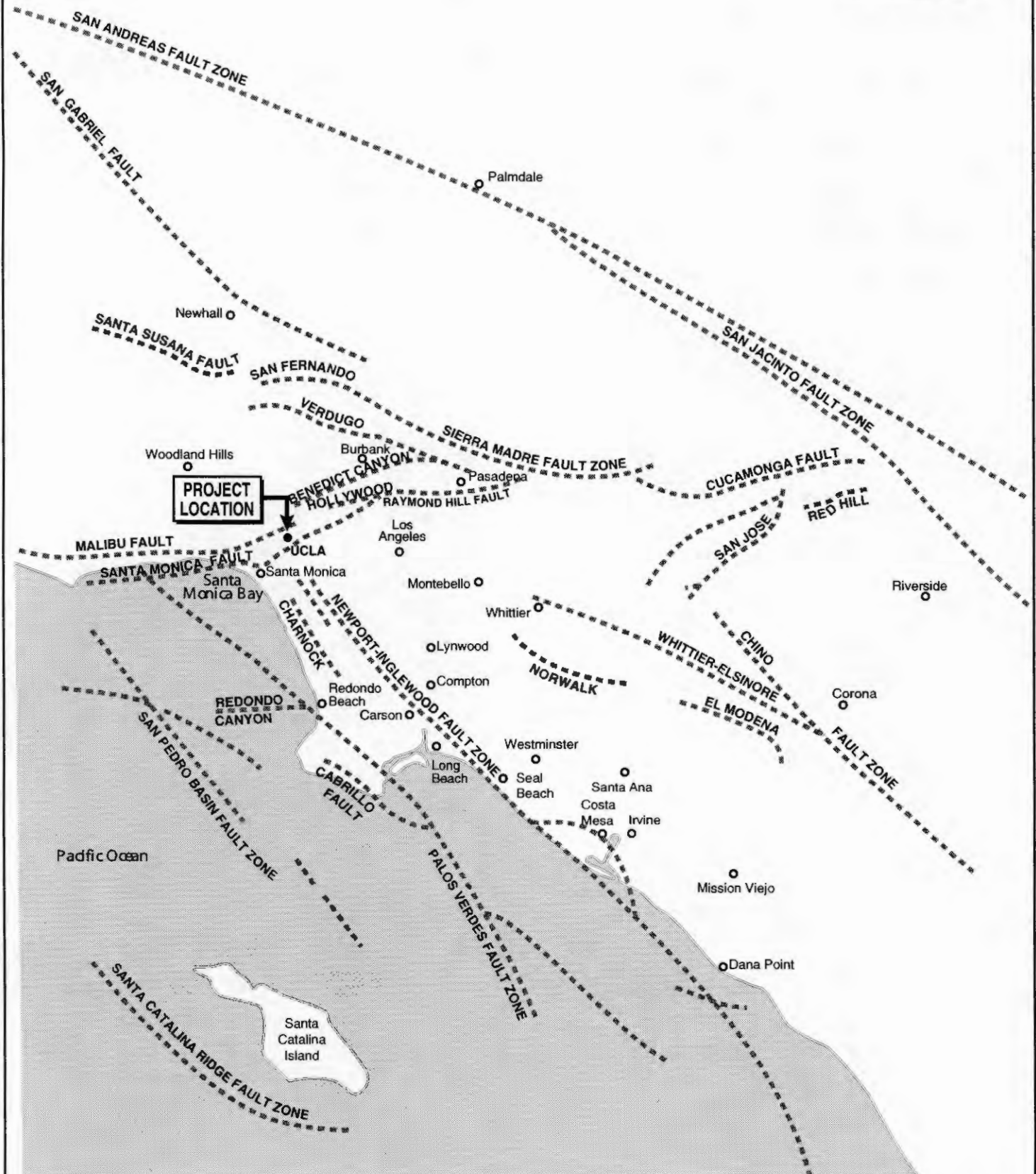
C. FIGURE CHANGES

This section includes revisions to three figures, which were initiated either by Lead Agency staff or in response to public comments:

- Volume 1, page 4.5-5, Figure 4.5-2 (Regional Fault Map)
- Volume 2, page 3-5, Figure 3-2 (Existing Conditions: Northwest Zone)
- Volume 2, page 3-10, Figure 3-3 (Conceptual Site Plan)

The changes appear in order of their location in the 2002 LRDP Draft EIR.

Revised figure



0 5 10 20 Scale In Miles



EIP
ASSOCIATES

FIGURE 4.5-2
Regional Fault Map

SOURCE: CDMG OFR 92-03 (1992), USGS MFI-512 (1965)

10328-07

UCLA 2002 LRDP

Revised figure



Not to Scale

SOURCE: UCLA



10328-08

EIP

ASSOCIATES

FIGURE 3-2
Existing Conditions: Northwest Zone

UCLA Northwest Housing Infill Project

Revised figure



Not to Scale

SOURCE: UCLA



10328-08

EIP
ASSOCIATES

FIGURE 3-3
Conceptual Site Plan

UCLA Northwest Housing Infill Project

Chapter III

RESPONSES TO COMMENTS

A. OVERVIEW

The Draft LRDP and EIR for the 2002 LRDP, including the NHIP, was issued on October 31, 2002, and initially circulated for public review and comment for a 46-day period scheduled to end on December 16, 2002. In response to a request from the community, the public review and comment period was extended an additional four days to December 20, 2002. CEQA requires a review period lasting at least 45 days but no longer than 60 days for projects that have been submitted to the State Clearinghouse for review by State agencies. See *CEQA Guidelines* Section 15105(a). During the public review period, 370 written comment letters on the 2002 LRDP Draft EIR and the proposed project were received by the University. These include 6 letters received from four different State, regional, and local public agencies; 9 letters received from seven different organizations; and 354 letters received from 349 different individuals.

During the public review period, copies of the 2002 LRDP Draft EIR were distributed to public agencies through the State of California, Office of Planning and Research. UCLA also directly distributed the document to over 80 individuals, agencies, and organizations. Copies of the 2002 LRDP Draft EIR were also available for review at two on-campus libraries and nine off-campus libraries. In addition, the 2002 LRDP Draft EIR and the documents referenced in the 2002 LRDP Draft EIR were available for public review on UCLA's website and during normal business hours at the UCLA Capital Programs Facility, which is located at 1060 Veteran Avenue, Third Floor, on the UCLA campus.

A public hearing was held on November 20, 2002, on the UCLA campus during which the public was given the opportunity to provide comments on the 2002 LRDP Draft EIR. Nine persons presented verbal comments on the proposed project and the 2002 LRDP Draft EIR during the public hearing.

Table III-1 provides the following information: (1) a comprehensive list of commenters grouped by State agencies, regional agencies, local agencies, community groups, and individuals; (2) the format in which the comments were received, whether as written testimony (during the public review period) or as verbal testimony (during the public hearing); (3) the reference code used to identify the commenter; and (4) the page number of this chapter where those comments and responses begin.

The complete text of the written and verbal comments—and the University of California’s response to those comments—is presented in this chapter. A copy of each comment letter is followed by its response(s), and the transcript for the Public Hearing, followed by its response, is found thereafter.

Multiple comments were received on a few key topics. To provide comprehensive responses regarding the issues raised, the University decided to prepare responses addressing all comments relating to each of these key areas. Each of these “topical” responses provides some background regarding the specific issue, how the issue was dealt with in the 2002 LRDP Draft EIR, and additional explanation as appropriate in response to the concerns raised in the comments. The beginning of each topical response identifies the comments addressed by the response.

Table III-1 List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
Government Agencies			
OPR (November 19, 2002)	Mail	1	III-30
OPR (November 25, 2002)	Mail	2	III-32
SCAG (December 9, 2002)	Mail	3	III-34
Caltrans (December 2, 2002)	Mail	4	III-36
Caltrans (December 5, 2002)	Mail	5	III-43
LADOT (December 20, 2002)	Mail	6	III-48
Community Groups			
Friends of Westwood (Laura Lake) (November 20, 2002)	Mail	7	III-56
HWPOA (Sandy Brown) (November 20, 2002)	Mail	8	III-59
WHPOA (Carole Magnuson) (December 14, 2002)	Mail	9	III-66
UCLA Watch (Alvin Milder) (November 27, 2002)	Mail	10	III-77
UCLA Watch (Alvin Milder) (November 28, 2002)	E-mail	11	III-83
UCLA Watch (Alvin Milder) (November 27, 2002)	Facsimile	11a	III-85
UCLA Watch (Alvin Milder) (December 19, 2002)	Mail	12	III-102
Bel Air Beverly Crest Neighborhood Council (Steven Lukasik) (December 20, 2002)	Facsimile	14	III-178
Urban Wildlands Group (Travis Longcore & Catherine Rich) (December 20, 2002)	Mail	16	III-228
IoE (Richard Turco) (December 20, 2002)	E-mail	17	III-276
Individuals			
von Leden, Hans (November 25, 2002)	Mail	13	III-176
Brieu, Phillippe P. (December 20, 2002)	Facsimile	15	III-221
DiPego, Pauline (December 12, 2002)	Mail	18	III-278
Gray, Toni (December 20, 2002)	Mail	19	III-283
Rozengurt, Nora (December 18, 2002)	Mail	20	III-297
Verdon, Paul (December 9, 2002)	Mail	21	III-308

Table III-1 List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
Black, James (December 14, 2002)	E-mail	22	III-313
Bowling, Mollie (December 12, 2002)	E-mail	23	III-315
Hayes, Siobhan (December 16, 2002)	E-mail	24	III-318
Kaisler, Denise (December 12, 2002)	E-mail	25	III-321
Louisell, Becca (December 16, 2002)	Mail	26	III-325
Nelson, Jeremy (December 18, 2002)	E-mail	27	III-331
Rosenfeld, Paula Castro (December 14, 2002)	Mail	28	III-334
Vallier, John (December 20, 2002)	Mail	29	III-336
Shoup, Don (December 16, 2002)	Mail	30	III-339
Shoup, Don (December 18, 2002)	Mail	31	III-350
Berris, Marcia (December 17, 2002)	Mail	32	III-407
Dunnigan, Maureen (December 20, 2002)	Facsimile	33	III-414
Lee, Patricia (December 20, 2002)	Facsimile	34	III-417
Levin, Sandy (December 18, 2002)	Facsimile	35	III-420
Mathews, Karen (December 20, 2002)	Facsimile	36	III-422
Monkkonen, Eric (December 18, 2002)	Facsimile	37	III-425
Reynoso, Maria (December 18, 2002)	Facsimile	38	III-427
Aberbach, Joel (December 17, 2002)	E-mail	39	III-429
Adams, Matthew (December 18, 2002)	E-mail	40	III-431
Aelony, Shana (December 17, 2002)	E-mail	41	III-433
Alcond, Kirk (December 18, 2002)	E-mail	42	III-435
Alcond, Kirk (December 18, 2002)	E-mail	43	III-437
Altamimi, Nadida (December 17, 2002)	E-mail	44	III-439
Arkush, Elizabeth (December 17, 2002)	E-mail	45	III-441
Armitage, Anna (December 17, 2002)	E-mail	46	III-443
Arragada, Diego (December 18, 2002)	E-mail	47	III-445
Boisvert, Alexander (December 17, 2002)	E-mail	48	III-447
Boggs, Jeff (December 16, 2002)	E-mail	49	III-449
Bondurant, James (December 17, 2002)	E-mail	50	III-451
Brooks, Leah (December 17, 2002)	E-mail	51	III-453
Brown, Danielle (December 17, 2002)	E-mail	52	III-455
Buchanan, Matt (December 17, 2002)	E-mail	53	III-457
Bullock, Michael (December 18, 2002)	E-mail	54	III-459
Buu, MyMy (December 17, 2002)	E-mail	55	III-461
Campion, Mike (December 17, 2002)	E-mail	56	III-463
Chan, Winston (December 17, 2002)	E-mail	57	III-465
Chavoya, Rosemary (December 17, 2002)	E-mail	58	III-467

Table III-1 List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
Black, James (December 14, 2002)	E-mail	22	III-313
Bowling, Mollie (December 12, 2002)	E-mail	23	III-315
Hayes, Siobhan (December 16, 2002)	E-mail	24	III-318
Kaisler, Denise (December 12, 2002)	E-mail	25	III-321
Louisell, Becca (December 16, 2002)	Mail	26	III-325
Nelson, Jeremy (December 18, 2002)	E-mail	27	III-331
Rosenfeld, Paula Castro (December 14, 2002)	Mail	28	III-334
Vallier, John (December 20, 2002)	Mail	29	III-336
Shoup, Don (December 16, 2002)	Mail	30	III-339
Shoup, Don (December 18, 2002)	Mail	31	III-350
Berris, Marcia (December 17, 2002)	Mail	32	III-407
Dunnigan, Maureen (December 20, 2002)	Facsimile	33	III-414
Lee, Patricia (December 20, 2002)	Facsimile	34	III-417
Levin, Sandy (December 18, 2002)	Facsimile	35	III-420
Mathews, Karen (December 20, 2002)	Facsimile	36	III-422
Monkkonen, Eric (December 18, 2002)	Facsimile	37	III-425
Reynoso, Maria (December 18, 2002)	Facsimile	38	III-427
Aberbach, Joel (December 17, 2002)	E-mail	39	III-429
Adams, Matthew (December 18, 2002)	E-mail	40	III-431
Aelony, Shana (December 17, 2002)	E-mail	41	III-433
Alcond, Kirk (December 18, 2002)	E-mail	42	III-435
Alcond, Kirk (December 18, 2002)	E-mail	43	III-437
Altamimi, Nadida (December 17, 2002)	E-mail	44	III-439
Arkush, Elizabeth (December 17, 2002)	E-mail	45	III-441
Armitage, Anna (December 17, 2002)	E-mail	46	III-443
Arragada, Diego (December 18, 2002)	E-mail	47	III-445
Boisvert, Alexander (December 17, 2002)	E-mail	48	III-447
Boggs, Jeff (December 16, 2002)	E-mail	49	III-449
Bondurant, James (December 17, 2002)	E-mail	50	III-451
Brooks, Leah (December 17, 2002)	E-mail	51	III-453
Brown, Danielle (December 17, 2002)	E-mail	52	III-455
Buchanan, Matt (December 17, 2002)	E-mail	53	III-457
Bullock, Michael (December 18, 2002)	E-mail	54	III-459
Buu, MyMy (December 17, 2002)	E-mail	55	III-461
Campion, Mike (December 17, 2002)	E-mail	56	III-463
Chan, Winston (December 17, 2002)	E-mail	57	III-465
Chavoya, Rosemary (December 17, 2002)	E-mail	58	III-467

Table III-I List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
Chow, Tammy (December 17, 2002)	E-mail	59	III-469
Christensen, Stephanie (December 17, 2002)	E-mail	60	III-471
Chu, Julia (December 17, 2002)	E-mail	61	III-473
Chung, Julie (December 17, 2002)	E-mail	62	III-475
Clevenger, Jason (December 17, 2002)	E-mail	63	III-477
Cohen, Jeff (December 17, 2002)	E-mail	64	III-479
Cyr, Darin (December 17, 2002)	E-mail	65	III-481
Czaja, Andy (December 17, 2002)	E-mail	66	III-483
Daily, Jess (December 18, 2002)	E-mail	67	III-485
Dandekar, Sugandha (December 18, 2002)	E-mail	68	III-487
Danfoura, Samer (December 17, 2002)	E-mail	69	III-489
Decker, Christopher (December 17, 2002)	E-mail	70	III-491
Delp, Linda (December 17, 2002)	E-mail	71	III-493
Doherty, Joseph (December 17, 2002)	E-mail	72	III-495
Doran, Charles (December 18, 2002)	E-mail	73	III-497
Dorsey, Michael (December 17, 2002)	E-mail	74	III-499
DuVernois, Carol (December 18, 2002)	E-mail	75	III-501
Ehrenfeucht, Renia (December 17, 2002)	E-mail	76	III-503
Eidlin, Eric (December 17, 2002)	E-mail	77	III-505
Eisenberg, Michael (December 17, 2002)	E-mail	78	III-507
Favell, Adrian (December 18, 2002)	E-mail	79	III-509
Fernandez, Kimberly (December 17, 2002)	E-mail	80	III-511
Foster, Suzanne (December 17, 2002)	E-mail	81	III-513
Frank, Rebecca (December 17, 2002)	E-mail	82	III-515
Freeman, Jan (December 17, 2002)	E-mail	83	III-517
French, Susan (December 17, 2002)	E-mail	84	III-519
Gaerlan, Barbara (December 17, 2002)	E-mail	85	III-521
Galindo, Moses (December 17, 2002)	E-mail	86	III-523
Garrow, Eve (December 17, 2002)	E-mail	87	III-525
Ginsberg, Lev (December 17, 2002)	E-mail	88	III-527
Gordon, Jared (December 17, 2002)	E-mail	89	III-529
Gorter, Timothy (December 18, 2002)	E-mail	90	III-531
Greenberger, Martin (December 17, 2002)	E-mail	91	III-533
Gu, Fang (December 17, 2002)	E-mail	92	III-535
Guilds, Rick (December 18, 2002)	E-mail	93	III-537
Hayashi, Natalie (December 17, 2002)	E-mail	94	III-539
Hernandez, Ebelia (December 17, 2002)	E-mail	95	III-541

Table III-I List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
Hernandez-Leon, Ruben (December 17, 2002)	E-mail	96	III-543
Hill, Juniper (December 17, 2002)	E-mail	97	III-545
Hills, Alison (December 17, 2002)	E-mail	98	III-547
Hiro, Molly (December 17, 2002)	E-mail	99	III-549
Ho, Melanie (December 17, 2002)	E-mail	100	III-551
Hoffman, Kathleen (December 17, 2002)	E-mail	101	III-553
Holliday, Kevin (December 17, 2002)	E-mail	102	III-555
Holtgrewe, Vanessa (December 17, 2002)	E-mail	103	III-557
Ibarra, Teresa (December 18, 2002)	E-mail	104	III-559
Jackson, Ric (December 17, 2002)	E-mail	105	III-561
Jamal, Zainab (December 17, 2002)	E-mail	106	III-563
James, Matthew (December 17, 2002)	E-mail	107	III-565
Johnson, Yvette Johnson (December 18, 2002)	E-mail	108	III-567
Jones, Andrea (December 17, 2002)	E-mail	109	III-569
Kaisler, Denise (December 17, 2002)	E-mail	110	III-571
Kasten, Kathy (December 18, 2002)	E-mail	111	III-573
Katz, Hagal (December 17, 2002)	E-mail	112	III-575
Keehn, William (December 17, 2002)	E-mail	113	III-577
Kern, Rita (December 17, 2002)	E-mail	114	III-579
Kim, Bo Mee (December 17, 2002)	E-mail	115	III-581
Kimball, Bridget (December 17, 2002)	E-mail	116	III-583
Kimelman, Peter (December 17, 2002)	E-mail	117	III-585
Kimiagar, Yeganeh (December 17, 2002)	E-mail	118	III-587
Kleiman, Mark (December 17, 2002)	E-mail	119	III-589
Ko, Yu-Fu (December 17, 2002)	E-mail	120	III-591
Kolozsvari, Douglas (December 17, 2002)	E-mail	121	III-593
Kudo, Lili (December 17, 2002)	E-mail	122	III-595
Kumin, Elizabeth (December 17, 2002)	E-mail	123	III-597
Lancero, Hope (December 17, 2002)	E-mail	124	III-599
Le, Thuong (December 17, 2002)	E-mail	125	III-601
Leahy, Mo (December 17, 2002)	E-mail	126	III-603
Lee, Jennifer (December 17, 2002)	E-mail	127	III-605
Lee, Lynn (December 17, 2002)	E-mail	128	III-607
Lee, Rachel (December 17, 2002)	E-mail	129	III-609
Lee, Yan Y. (December 18, 2002)	E-mail	130	III-611
Lerner, Leib (December 17, 2002)	E-mail	131	III-613
Levin, Mary (December 18, 2002)	E-mail	132	III-615

Table III-I List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
<i>There is no Letter 133; this was intentionally left blank and maintained for numbering purposes.</i>			
Lu, Ann (December 17, 2002)	E-mail	134	III-618
Lucido, Danielle (December 18, 2002)	E-mail	135	III-620
Luna, Amanda (December 17, 2002)	E-mail	136	III-622
Lyon, Steve (December 17, 2002)	E-mail	137	III-624
Mam, Kalyanee (December 17, 2002)	E-mail	138	III-626
Manoukis, Nick (December 17, 2002)	E-mail	139	III-628
Maricich, Nick (December 17, 2002)	E-mail	140	III-630
Martinez, Felipe (December 16, 2002)	E-mail	141	III-632
Masterman-Smith, Michael (December 17, 2002)	E-mail	142	III-634
Maynard, Kelly (December 17, 2002)	E-mail	143	III-636
Medina, Jocelyn (December 17, 2002)	E-mail	144	III-638
Mellerstig, Jason (December 17, 2002)	E-mail	145	III-640
Mercado, Angelo (December 16, 2002)	E-mail	146	III-642
Mertes, Tom (December 17, 2002)	E-mail	147	III-644
Mitchell, Daniel (December 17, 2002)	E-mail	148	III-646
Moeel, Shaffy (December 17, 2002)	E-mail	149	III-648
Moga, Karra (December 17, 2002)	E-mail	150	III-650
Montalvo, Ray (December 17, 2002)	E-mail	151	III-652
Monte, Christine (December 17, 2002)	E-mail	152	III-654
Montes, Paula (December 17, 2002)	E-mail	153	III-656
Morioka, Craig (December 17, 2002)	E-mail	154	III-658
Mosley, Jennifer (December 17, 2002)	E-mail	155	III-660
Murry, Geoffrey (December 17, 2002)	E-mail	156	III-662
Myers, Douglas (December 17, 2002)	E-mail	157	III-664
McCall, Christina (December 17, 2002)	E-mail	158	III-666
McMahan, Jeffrey N. (December 17, 2002)	E-mail	159	III-668
Nack, Jaime (December 17, 2002)	E-mail	160	III-670
Nagao, Christina (December 17, 2002)	E-mail	161	III-672
Naito, Jonathan (December 17, 2002)	E-mail	162	III-674
Nelson, Todd (December 17, 2002)	E-mail	163	III-676
Nilsson, Michelle (December 17, 2002)	E-mail	164	III-678
Nowland, Robert (December 17, 2002)	E-mail	165	III-680
Obenski, Stephen (December 17, 2002)	E-mail	166	III-682
O'Brien, Eileen (December 18, 2002)	E-mail	167	III-684
O'Hara, Kate (December 17, 2002)	E-mail	168	III-686
Olsen, Frances (December 18, 2002)	E-mail	169	III-688

Table III-I List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
Pankratz, Shannon (December 17, 2002)	E-mail	170	III-690
Pitkin, William (December 17, 2002)	E-mail	171	III-692
Fischer, Lisa Pope (December 17, 2002)	E-mail	172	III-694
Quinones, Patricia (December 17, 2002)	E-mail	173	III-696
Rattray, Nick (December 17, 2002)	E-mail	174	III-698
Ratzlaff, Allison (December 17, 2002)	E-mail	175	III-700
<i>There is no Letter 176; this was intentionally left blank and maintained for numbering purposes.</i>			
<i>There is no Letter 177; this was intentionally left blank and maintained for numbering purposes.</i>			
Remes, Sarah (December 17, 2002)	E-mail	178	III-704
Richter, Jonathan (December 17, 2002)	E-mail	179	III-706
Roberson, Jennifer (December 17, 2002)	E-mail	180	III-708
Robinson, Geoffrey (December 17, 2002)	E-mail	181	III-710
Rodriguez, Debra (December 18, 2002)	E-mail	182	III-712
Rolston, Arthur (December 17, 2002)	E-mail	183	III-714
Ross, Whitney (December 17, 2002)	E-mail	184	III-716
Roudabush, Melissa (December 17, 2002)	E-mail	185	III-718
Salstrom, Jennifer (December 17, 2002)	E-mail	186	III-720
Sanders, Kay (December 17, 2002)	E-mail	187	III-722
Sasis, Edna (December 17, 2002)	E-mail	188	III-724
Schilling, Robert (December 17, 2002)	E-mail	189	III-726
Schweitzer, Stuart (December 17, 2002)	E-mail	190	III-728
Sharpe, Jennifer (December 17, 2002)	E-mail	191	III-731
Sheats, Paul (December 17, 2002)	E-mail	192	III-733
Shel, Tammy (December 17, 2002)	E-mail	193	III-735
Singh, Charanjeet (December 17, 2002)	E-mail	194	III-737
Skierso, Alexandra (December 17, 2002)	E-mail	195	III-739
Soma, Kiran (December 17, 2002)	E-mail	196	III-741
Stafford, Dylan (December 17, 2002)	E-mail	197	III-743
Streeter, Caroline (December 17, 2002)	E-mail	198	III-745
Strumpell, Kent (December 17, 2002)	E-mail	199	III-747
Suzuki, Shizuka (December 17, 2002)	E-mail	200	III-749
Ta, Anh (December 17, 2002)	E-mail	201	III-751
Telles, Edward (December 17, 2002)	E-mail	202	III-753
Thatcher, Diana (December 17, 2002)	E-mail	203	III-755
Thompson, Clark (December 18, 2002)	E-mail	204	III-757
Thorson, Carla (December 17, 2002)	E-mail	205	III-759
Treantafelles, Theodore (December 17, 2002)	E-mail	206	III-761

Table III-I List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
Tripathi, Arun (December 17, 2002)	E-mail	207	III-764
Truong, Minh (December 17, 2002)	E-mail	208	III-766
Vargas, Greg (December 17, 2002)	E-mail	209	III-768
Velasco, Josette (December 17, 2002)	E-mail	210	III-770
Vergara, Camille (December 17, 2002)	E-mail	211	III-772
von Hungen, Rita (December 18, 2002)	E-mail	212	III-774
von Stein, Jana (December 17, 2002)	E-mail	213	III-776
Vyas, Nisha (December 17, 2002)	E-mail	214	III-778
Wadewitz, Lissa (December 17, 2002)	E-mail	215	III-780
Walsh, Tom (December 17, 2002)	E-mail	216	III-782
Wank, Brian (December 17, 2002)	E-mail	217	III-784
Wang, Tao-Yi (December 17, 2002)	E-mail	218	III-786
Washburn, Kathleen (December 17, 2002)	E-mail	219	III-788
Weiner, Michael (December 18, 2002)	E-mail	220	III-790
Weston, Ben (December 18, 2002)	E-mail	221	III-792
Wich, Katherine (December 17, 2002)	E-mail	222	III-794
Wilkes, Rachel (December 17, 2002)	E-mail	223	III-796
Williams, Katherine (December 17, 2002)	E-mail	224	III-798
Wilson, Stephen (December 17, 2002)	E-mail	225	III-800
Wind, Sundari (December 17, 2002)	E-mail	226	III-802
Wu, Sheng (December 17, 2002)	E-mail	227	III-804
Wu, Shinn (December 17, 2002)	E-mail	228	III-806
Yamauchi, Chikako (December 17, 2002)	E-mail	229	III-808
Yaquian, Rafael (December 17, 2002)	E-mail	230	III-810
Yarborough, Richard (December 17, 2002)	E-mail	231	III-812
Yi, April (December 17, 2002)	E-mail	232	III-814
Young, Josh (December 17, 2002)	E-mail	233	III-816
Yun, Joletta (December 17, 2002)	E-mail	234	III-818
Zeitlin, Maurice (December 17, 2002)	E-mail	235	III-820
Abeyta, Liza (December 18, 2002)	E-mail	236	III-822
Bachman, Peter (December 19, 2002)	E-mail	237	III-824
Benitez, Adam (December 18, 2002)	E-mail	238	III-826
Bledsoe, Joshua (December 18, 2002)	E-mail	239	III-828
Brown, Carlene (December 18, 2002)	E-mail	240	III-830
Burns, Marianne (December 18, 2002)	E-mail	241	III-832
Burns, Marianne (December 18, 2002)	E-mail	242	III-834
Carpiac, Maria (December 18, 2002)	E-mail	243	III-836

Table III-I List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
<i>There is no Letter 244; this was intentionally left blank and maintained for numbering purposes.</i>			
Chatman, Jason (December 19, 2002)	E-mail	245	III-839
Chen, Lydia (December 18, 2002)	E-mail	246	III-841
Cheng, Stephanie (December 18, 2002)	E-mail	247	III-843
Cohen, Julia (December 19, 2002)	E-mail	248	III-845
Corea-London, Blanca (December 18, 2002)	E-mail	249	III-847
Daugherty, Kurt (December 19, 2002)	E-mail	250	III-849
Davis, Brian (December 18, 2002)	E-mail	251	III-851
Davoudi, Mehrnaz (December 19, 2002)	E-mail	252	III-853
del Pino, Homero (December 18, 2002)	E-mail	253	III-855
Del Toro, Karina (December 18, 2002)	E-mail	254	III-857
Dennis, Nancy (December 18, 2002)	E-mail	255	III-859
Dia, Ederlyn (December 19, 2002)	E-mail	256	III-861
Dresden, Matthew (December 18, 2002)	E-mail	257	III-863
Dunagan, Julie (December 18, 2002)	E-mail	258	III-865
Ebrey, David (December 19, 2002)	E-mail	259	III-867
Finefrock, Laura (December 18, 2002)	E-mail	260	III-869
Franks, Mike (December 18, 2002)	E-mail	261	III-872
Frischman, Carol (December 18, 2002)	E-mail	262	III-874
Gomez, Monica (December 18, 2002)	E-mail	263	III-876
Graham, Elizabeth (December 18, 2002)	E-mail	264	III-878
Halladay, Jane (December 19, 2002)	E-mail	265	III-880
Heckman, Genevieve (December 19, 2002)	E-mail	266	III-882
Herre, Susan (December 19, 2002)	E-mail	267	III-884
Hieronymi, Pamela (December 18, 2002)	E-mail	268	III-886
Hsu, Andrew (December 18, 2002)	E-mail	269	III-888
Hunt, Lynn (December 18, 2002)	E-mail	270	III-890
Kincheloe, Jennifer (December 19, 2002)	E-mail	271	III-892
King, Rex (December 18, 2002)	E-mail	272	III-894
Kulesa, Laurie (December 18, 2002)	E-mail	273	III-896
Kyas, Jirina (December 18, 2002)	E-mail	274	III-898
Larsen, Todd (December 18, 2002)	E-mail	275	III-900
Leung, Henry (December 18, 2002)	E-mail	276	III-902
Liang, Lisa (December 19, 2002)	E-mail	277	III-904
Lichiu, Frini (December 18, 2002)	E-mail	278	III-906
Mackenzie-Graham, Allan (December 18, 2002)	E-mail	279	III-908
Marin, Gregory (December 19, 2002)	E-mail	280	III-910

Table III-I List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
Marroquin, Jose (December 18, 2002)	E-mail	281	III-912
Mshaka, Sumiyah (December 19, 2002)	E-mail	282	III-914
Muqtasid, Hajar (December 18, 2002)	E-mail	283	III-916
McCarthy, L. (December 19, 2002)	E-mail	284	III-918
Nelson, Jeremy (December 18, 2002)	E-mail	285	III-920
Nelson, John (December 19, 2002)	E-mail	286	III-926
Ng, Jennifer (December 18, 2002)	E-mail	287	III-928
Nguyen, Theresea (December 18, 2002)	E-mail	288	III-930
Palmer, Maria (December 18, 2002)	E-mail	289	III-932
Paus, Amanda (December 18, 2002)	E-mail	290	III-934
Pressman, Leah (December 18, 2002)	E-mail	291	III-936
Ramos, Lucia (December 19, 2002)	E-mail	292	III-938
Renteria, Fabian (December 19, 2002)	E-mail	293	III-940
Rolnick, Addie (December 18, 2002)	E-mail	294	III-942
Rosario, Vernon (December 18, 2002)	E-mail	295	III-944
Rosenfeld, Susan (December 18, 2002)	E-mail	296	III-946
Rosner, Beth (December 18, 2002)	E-mail	297	III-948
Saben, Jonathan (December 18, 2002)	E-mail	298	III-950
Saguy, Abigail (December 18, 2002)	E-mail	299	III-952
Sahadeva-Brooks, Usha (December 18, 2002)	E-mail	300	III-954
Sanson, David (December 18, 2002)	E-mail	301	III-956
Schraub, Jessica (December 18, 2002)	E-mail	302	III-958
Schwartz, Craig (December 19, 2002)	E-mail	303	III-960
Scruggs, Alayna (December 18, 2002)	E-mail	304	III-963
Seligmann, Ari (December 18, 2002)	E-mail	305	III-965
Simon, Justin (December 18, 2002)	E-mail	306	III-967
Simon, Steven (December 18, 2002)	E-mail	307	III-969
Sinton, Seelig (December 18, 2002)	E-mail	308	III-971
Son, Jung (December 18, 2002)	E-mail	309	III-973
Spear, Suzanne (December 18, 2002)	E-mail	310	III-975
Spencer, Jayne (December 19, 2002)	E-mail	311	III-977
Sullivan, Eileen (December 18, 2002)	E-mail	312	III-979
Tan, Pei Pei (December 18, 2002)	E-mail	313	III-981
Tejero, Judy (December 18, 2002)	E-mail	314	III-983
Viola, Nicole (December 18, 2002)	E-mail	315	III-985
Wald, Carol (December 19, 2002)	E-mail	316	III-987
Wang, Meiying (December 19, 2002)	E-mail	317	III-989

Table III-I List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
Wartian, Nikki (December 18, 2002)	E-mail	318	III-991
Wilson, Veronica (December 18, 2002)	E-mail	319	III-993
Wu, Christina (December 19, 2002)	E-mail	320	III-995
Yakowitz, Jane (December 18, 2002)	E-mail	321	III-997
Yu, Nina (December 18, 2002)	E-mail	322	III-999
Alagona, Pete (December 19, 2002)	E-mail	323	III-1001
Atkinson, Daniel (December 20, 2002)	E-mail	324	III-1003
Berglund, Ginger (December 20, 2002)	E-mail	325	III-1005
Burke, J. (December 20, 2002)	E-mail	326	III-1007
Chappell, Stephen (December 19, 2002)	E-mail	327	III-1009
Collins, Natalie (December 20, 2002)	E-mail	328	III-1011
Chu, Pauline (December 20, 2002)	E-mail	329	III-1013
Daltro-Schram, Lindsey (December 19, 2002)	E-mail	330	III-1015
Dicks, Scott (December 20, 2002)	E-mail	331	III-1017
Dijamco, Angeline (December 19, 2002)	E-mail	332	III-1019
Du, Zeying (December 20, 2002)	E-mail	333	III-1021
Dudukovic, Nicole (December 20, 2002)	E-mail	334	III-1023
Erenea, Darlene (December 19, 2002)	E-mail	335	III-1025
Falzareno, Kathryn (December 19, 2002)	E-mail	336	III-1027
Fish, Kate (December 20, 2002)	E-mail	337	III-1029
Fisher, Jason (December 20, 2002)	E-mail	338	III-1031
Foley, Elizabeth (December 20, 2002)	E-mail	339	III-1033
Garmoe, Kimberly (December 19, 2002)	E-mail	340	III-1035
Garnett, David (December 20, 2002)	E-mail	341	III-1037
Given, Suzan (December 19, 2002)	E-mail	342	III-1039
Graham, Stacey (December 19, 2002)	E-mail	343	III-1042
Gurfield, Robert (December 19, 2002)	E-mail	344	III-1044
Hayes, Siobhan (December 19, 2002)	E-mail	345	III-1046
Hower, Dawn (December 20, 2002)	E-mail	346	III-1049
Itagaki, Lynn (December 20, 2002)	E-mail	347	III-1051
Johnson, Mary Jo (December 20, 2002)	E-mail	348	III-1053
Kuyucu, Tuna (December 19, 2002)	E-mail	349	III-1055
Le Normand, Brigitte (December 19, 2002)	E-mail	350	III-1057
Lucas, Ann (December 20, 2002)	E-mail	351	III-1059
Lux, Renate (December 20, 2002)	E-mail	352	III-1061
Matthias, Ruth (December 19, 2002)	E-mail	353	III-1063
Meldrum, Marcia (December 19, 2002)	E-mail	354	III-1065

Table III-I List of Commenters

Commenter	How Received	Comment Letter No.	Page No.
Miller, Patrick (December 19, 2002)	E-mail	355	III-1067
Nery, Jennifer (December 20, 2002)	E-mail	356	III-1069
Ramos, Marisol (December 20, 2002)	E-mail	357	III-1071
Rosenthal, Nicholas (December 20, 2002)	E-mail	358	III-1075
Sanderson, Steven (December 20, 2002)	E-mail	359	III-1077
Schibler, Matthew (December 20, 2002)	E-mail	360	III-1079
Shane, A. Haviva (December 19, 2002)	E-mail	361	III-1081
Shepard, Shane (December 20, 2002)	E-mail	362	III-1083
Shepard, Zachary (December 19, 2002)	E-mail	363	III-1085
Sirkin, David (December 19, 2002)	E-mail	364	III-1087
Trachtenberg, Barry (December 19, 2002)	E-mail	365	III-1089
Valdivia, Rick (December 20, 2002)	E-mail	366	III-1091
Vanderbilt, Gregory (December 20, 2002)	E-mail	367	III-1093
Wheeler, Vera (December 20, 2002)	E-mail	368	III-1096
Woodson-Boulton, Amy (December 19, 2002)	E-mail	369	III-1098
Johnston, Michael Francis (December 21, 2002)	Facsimile	370	III-1100
Taylor, Brian D. (December 21, 2002)	E-mail	371	III-1102
Li, Weiping (December 23, 2002)	E-mail	372	III-1110
Hoaby, Scott E. (December 18, 2002)	Mail	373	III-1113

Public Hearing (November 20, 2002)

Dipego, Pauline	Verbal	T	III-1118
Dobkin, Bruce	Verbal		
Gonick, Dr. Harvey	Verbal		
Gray, Toni	Verbal		
Milder, Alvin	Verbal		
Milder, Andrew	Verbal		
Patterson, Tom	Verbal		
Rozengurt, Norma	Verbal		
Verdon, Paul	Verbal		

B. RESPONSES TO COMMENTS

This section of the 2002 LRDP Final EIR contains all comments received on the 2002 LRDP Draft EIR during the public review period, as well as the Lead Agency's responses to these comments. Reasoned, factual responses have been provided to all comments received, with a particular emphasis on significant environmental issues. Detailed responses have been provided where a comment raises a specific issue; however, a general response has been provided where the comment is relatively general. Where a comment does not raise an environmental issue, or expresses the subjective opinion of the commenter, the comment is noted, but no response is provided.

I. Topical Responses

Topical responses are provided for broad issue areas where there were more than one or two public comments. Specifically, topical responses are provided to address the following issues: (A) the BruinGo program; (B) the Hilgard Bus Terminal; (C) Allocation of Enrollment Growth to the UCLA Campus; (D) Bicycle Commuting Conditions and Facilities; and (E) Opportunity to Submit Public Comments.

Topical Response A—BruinGo Program

This topical response addresses Comments 8-8, 14-24, 20-4, 30-1, 30-2, 30-3, 30-4, 30-5, 30-6, 30-7, 30-8, 30-9, 30-10, 30-11, 30-12, 30-13, 30-14, 30-15, 31-2, 31-5, 31-6, 31-7, 31-8, 31-9, 31-10, 31-11, 31-12, 31-15, 32-2, 32-3, 33-1, 34-2, 35-1, 36-3, 37-2, 38-1, 39-1, 40-1, 41-1, 42-1, 43-1, 44-1, 45-1, 46-1, 47-1, 48-1, 49-1, 50-1, 51-1, 52-1, 53-1, 54-1, 55-1, 56-1, 57-1, 58-1, 59-1, 60-1, 61-1, 62-1, 63-1, 64-1, 65-1, 66-1, 67-1, 68-1, 69-1, 70-1, 71-1, 72-1, 73-1, 74-1, 75-1, 76-1, 77-1, 78-1, 79-1, 80-1, 81-1, 82-1, 83-1, 84-1, 85-1, 86-1, 87-1, 88-1, 89-1, 90-1, 91-1, 92-1, 93-1, 94-1, 95-1, 96-1, 97-1, 98-1, 99-1, 100-1, 101-1, 102-1, 103-1, 104-1, 105-1, 106-1, 107-1, 108-1, 109-1, 110-1, 111-1, 112-1, 113-1, 114-1, 115-1, 116-1, 117-1, 118-1, 119-1, 120-1, 121-1, 122-1, 123-1, 124-1, 125-1, 126-1, 127-1, 128-1, 129-1, 130-1, 131-1, 132-1, 134-1, 135-1, 136-1, 137-1, 138-1, 139-1, 140-1, 141-1, 142-1, 143-1, 144-1, 145-1, 146-1, 147-1, 148-1, 149-1, 150-1, 151-1, 152-1, 153-1, 154-1, 155-1, 156-1, 157-1, 158-1, 159-1, 160-1, 161-1, 162-1, 163-1, 164-1, 165-1, 166-1, 167-1, 168-1, 169-1, 170-1, 171-1, 172-1, 173-1, 174-1, 175-1, 178-1, 179-1, 180-1, 181-1, 182-1, 183-1, 184-1, 185-1, 186-1, 187-1, 188-1, 189-1, 190-1, 190-3, 191-1, 192-1, 193-1, 194-1, 195-1, 196-1, 197-1, 198-1, 199-1, 200-1, 201-1, 202-1, 203-1, 204-1, 205-1, 206-1, 207-1, 208-1, 209-1, 210-1, 211-1, 212-1, 213-1, 214-1, 215-1, 216-1, 217-1, 218-1, 219-1, 220-1, 221-1, 222-1, 223-1, 224-1, 225-1, 226-1, 227-1, 228-1, 229-1, 230-1, 231-1, 232-1, 233-1, 234-1, 235-1, 236-1, 237-1, 238-1, 239-1, 240-1, 241-1, 242-1, 243-1, 245-1, 246-1, 247-1, 248-1, 249-1, 250-1, 251-1, 252-1, 253-1, 254-1, 255-1, 256-1, 257-1, 258-1, 259-1, 260-1, 261-1, 262-1, 263-1, 264-1, 265-1, 266-1, 267-1,

268-1, 269-1, 270-1, 271-1, 272-1, 273-1, 274-1, 275-1, 276-1, 277-1, 278-1, 279-1, 280-1, 281-1, 282-1, 283-1, 284-1, 285-4, 285-5, 286-1, 287-1, 288-1, 289-1, 290-1, 291-1, 292-1, 293-1, 294-1, 295-1, 296-1, 297-1, 298-1, 299-1, 300-1, 301-1, 302-1, 303-1, 304-1, 305-1, 306-1, 307-1, 308-1, 309-1, 310-1, 311-1, 312-1, 313-1, 314-1, 315-1, 316-1, 317-1, 318-1, 319-1, 320-1, 321-1, 322-1, 323-1, 324-1, 325-1, 326-1, 327-1, 328-1, 329-1, 330-1, 331-1, 332-1, 333-1, 334-1, 335-1, 336-1, 337-1, 338-1, 339-1, 340-1, 341-1, 342-1, 343-1, 344-1, 345-1, 346-1, 347-1, 348-1, 349-1, 350-1, 351-1, 352-1, 353-1, 354-1, 355-1, 356-1, 358-1, 359-1, 360-1, 361-1, 362-1, 363-1, 364-1, 365-1, 366-1, 367-1, 368-1, 369-1, 370-2, 371-2, and 372-1.

These comments submitted on the 2002 LRDP Draft EIR (Volumes 1 and 2) focused on the BruinGo transit pass program. The majority of these comments expressed the mistaken conclusion that the campus has determined to terminate the BruinGo program. As the 2002 LRDP Draft EIR made clear, the BruinGo program would remain a pilot program, the effectiveness of which would continue to be evaluated by the campus. In addition, the 2002 LRDP Draft EIR stated that no determination had been made by the campus either to terminate the BruinGo program or continue it, pending the campus's ongoing evaluation. In January 2003, UCLA Transportation Services announced a proposal (see UCLA Transportation Demand Management Update, FY 2002-03 through FY 2005-06, UCLA Transportation Services, January 2003) to continue the BruinGo transit program as an ongoing element of the campus Transportation Demand Management (TDM) Program in light of its potential to reduce vehicle trips to campus. The integration of BruinGo into the campus TDM program would be accomplished through a multi-source funding approach, which includes shared user responsibility via co-payments, similar to the subsidies provided to the existing carpool and vanpool programs. A 25-cent-per-ride fare box co-payment would provide approximately 36 percent of funding for the program, with the remaining 64 percent proposed from parking revenues.

As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 to 4.13-17):

The Transportation Demand Management (TDM) Program began at UCLA in 1984 with the establishment of the Commuter Assistance—Ridesharing (CAR) department to promote formation of carpools, vanpools, and buspools and to expand utilization of alternative transportation modes. In 1987, a Transportation Systems and Demand Management program was adopted to reduce peak-hour traffic and reduce parking demand, with reduced fees for carpools, subsidies for van pools, shuttles from off-campus UCLA-owned housing clusters and remote parking lots, on-campus facilities for bicycles and mopeds, alternative work schedules, and campus participation in local and regional traffic improvement programs. The 1990 LRDP EIR incorporated components of the program as mitigation measures and proposed a substantial expansion of on-campus housing to further reduce student commute trips. Over time, the components of the TDM program have changed, as the campus strives to identify cost-effective strategies to reduce campus trip generation and parking demand.

As discussed in the 2002 LRDP Draft EIR (Volume 1, page 4.13-18):

In addition, the campus currently operates a pilot transit fare subsidy program entitled "BruinGo." UCLA and the Santa Monica Municipal Bus Lines launched the program at the beginning of academic year 2000-01 to provide fare-free bus travel to UCLA students, faculty, and staff on the "Big Blue Bus" upon presentation of a Bruin ID card. Although the campus continues to analyze the effectiveness of BruinGo within the context of the overall campus TDM program, the BruinGo pilot program has been extended for the 2002-03 academic year, through the spring quarter of 2003.

Because the term "fare-free" bus travel does not reflect the financial support of the program that has been provided to date from parking revenues, the text of the 2002 LRDP Draft EIR (Volume 1, page 4.13-18) is revised as follows:

In addition, the campus currently operates a pilot transit fare subsidy program entitled "BruinGo." UCLA and the Santa Monica Municipal Bus Lines launched the program at the beginning of academic year 2000-01 to provide ~~fare-free~~fare-free-subsidized bus travel to UCLA students, faculty, and staff on the "Big Blue Bus" upon presentation of a Bruin ID card. Although the campus continues to analyze the effectiveness of BruinGo within the context of the overall campus TDM program, the BruinGo pilot program has been extended for the 2002-03 academic year, through the spring quarter of 2003.

The 2002 LRDP Draft EIR acknowledged (Volume 1, page 4.13-46) that the Transportation Demand Management program shall be continued throughout the 2002 LRDP planning horizon of 2010-11:

PP 4.13-1(d) The campus shall continue to implement a TDM program that meets or exceeds all trip reduction and AVR requirements of the SCAQMD. The TDM program may be subject to modification as new technologies are developed or alternate program elements are found to be more effective. (This is identical to Air Quality PP 4.2-1(b) and Noise and Vibration PP 4.9-5(b).)

The 2002 LRDP Draft EIR also included a discussion (Volume 1, page 4.13-47) of the potential to further expand the TDM program to provide mitigation for the significant traffic impacts of LRDP implementation:

To achieve additional reductions in parking demand and vehicle trip generation, the campus could further expand the TDM program. As noted above, since the inception of the TDM program, the components of the program have varied, as the University has investigated various programs and incentives. Remote park and ride lots served by buspools and near-campus lots (on the Veterans Affairs property with shuttle service to campus and reduced permit rates) were both discontinued due to low demand. Transit subsidies for faculty and staff have previously been evaluated and have not been recommended because of the limited potential to reduce total parking demand. The campus has extended the BruinGo transit pass pilot program for another year and will further evaluate the potential of the program to cost-effectively reduce parking demand. The University will continue to search for strategies to reduce parking demand and trip generation that are both cost-effective and attractive to faculty, staff, and students.

Although the commenters were mistaken in their assertion that BruinGo had been terminated, numerous letters quoted a single sentence from the 2002 LRDP Draft EIR as evidence of that decision:

Transit subsidies for faculty and staff have previously been evaluated and have not been recommended because of the limited potential to reduce total parking demand.

This excerpt omitted the next two sentences in the paragraph in the 2002 LRDP Draft EIR (Volume 1, page 4.13-47), which are relevant to this discussion:

The campus has extended the BruinGo transit pass pilot program for another year and will further evaluate the potential of the program to cost-effectively reduce parking demand. The University will continue to search for strategies to reduce parking demand and trip generation that are both cost-effective and attractive to faculty, staff, and students...

Thus, the 2002 LRDP Draft EIR clearly indicated that "further analysis" of the BruinGo transit pass program would be conducted.

The campus has a history of searching for, analyzing, and developing means of reducing vehicle trips to campus and parking demand, and part of this effort has involved the analysis of whether providing transit subsidies, or a transit pass program, would be a cost-effective means of accomplishing this important objective. In 1998, the campus evaluated the potential effectiveness of monthly transit subsidies paid to eligible faculty and staff (which is not the same as the BruinGo transit pass program), which following analysis, was determined to have a limited potential to reduce parking demand for faculty and staff. See Crain & Associates, UCLA Transit Subsidies/Incentives Study, January 1998. As a result, the campus proceeded with the initiation of a pilot transit pass program for students, now known as BruinGo, with the Santa Monica Municipal Bus Lines (or Big Blue Bus). In addition, the participation of the Metropolitan Transportation Agency (MTA), the Culver City Municipal Bus Line (CCMBL), and the City of Los Angeles Department of Transportation was sought but was found to be infeasible at that time. It should be noted that BruinGo is not a transit program, but instead is only a subsidy program for eligible UCLA riders on existing Big Blue Bus routes. UCLA does not control the routes, number of buses, schedules of the Big Blue Bus through the BruinGo program, or through any other means.

The 2002 LRDP Draft EIR stated that the BruinGo pilot program is one component of the existing TDM program, being implemented on a trial basis. The 2002 LRDP Draft EIR also noted that an evaluation of the BruinGo program will be conducted after the program has been implemented through the spring quarter 2003, as the campus continues to search for strategies to reduce parking demand and trip generation that are both cost-effective and attractive to faculty, staff, and students. Thus, the 2002 LRDP Draft EIR neither rejected extension of BruinGo as a component of the TDM program, nor committed the campus to continue the program regardless of its effectiveness.

All of the comments on the BruinGo program asked that the program not be terminated. As indicated above, UCLA Transportation Services has proposed to continue the BruinGo program as part of the campus TDM Program. This 2002 LRDP Final EIR does not attempt to present a detailed discussion of the merits of the BruinGo program, or to confirm or refute data related to an analysis of the first year of the pilot program. As noted above, inclusion of PP 4.13-1(d) committed the campus to meet the AVR

and trip reduction requirements established by the SCAQMD throughout the planning horizon of the 2002 LRDP. Although the current elements of the TDM program were described in the 2002 LRDP Draft EIR, PP 4.13-1(d) acknowledged that the elements of the program are subject to change. The campus has implemented a comprehensive TDM program for almost two decades, which has substantially reduced parking demand and trip generation and achieved the AVR and trip reduction requirements mandated by the SCAQMD, and the campus will continue to implement a range of TDM measures that provide alternatives to solo-occupant vehicles as a means of commuting to campus. All comments received on the BruinGo program are appreciated, and have been considered by the University in its evaluation of the BruinGo program.

Topical Response B—Hilgard Bus Terminal

A number of commenters have expressed concerns regarding impacts associated with operations at the existing Hilgard Bus Terminal (HBT). In addition, several commenters have requested that additional analysis of existing HBT operations be conducted as part of the EIR for the 2002 LRDP. The UCLA campus is sensitive to the concerns of local neighbors, and is working with local government officials and bus companies to address the traffic, air quality and noise issues raised by neighborhood residents regarding the existing operations at the HBT. While many of the commenters have utilized the public comment period on the 2002 LRDP EIR to raise their concerns over existing HBT operations, these comments address existing activities (as acknowledged by some of the commenters) and not the potential future environmental effects associated with approval of the 2002 LRDP and thus are outside of the LRDP CEQA process. This topical response addresses Comments 8-8, 18-2, 18-3, 19-9, 19-10, 19-11, 19-12, 19-18, 19-19, 19-20, 19-21, 19-22, 19-24, 19-25, 19-26, 20-3, 20-4, 20-5, 20-6, 20-7, 20-8, 20-9, 20-10, 20-11, 20-12, 20-13, 20-14, 20-15, 20-16, 20-17, 20-18, 20-19, 21-3, 21-4, 21-5, 21-6, 21-7, 30-14, 116-1, 367-1, T-1, T-2, T-4, T-5, T-7, T-8, T-10, T-12, T-13, T-14, and T-15.

Consistent with CEQA requirements, the purpose of the 2002 LRDP Draft EIR is to analyze the impacts associated with physical changes in the environment resulting from the proposed approval of the 2002 LRDP by The Regents. See *CEQA Guidelines* Section 15002(a) ("basic purpose of CEQA is to inform governmental decision makers and the public about the potential significant environmental effects of proposed activities"). The CEQA analysis required for the 2002 LRDP addresses the effects of increased enrollment and the 1.7 million square feet of development previously approved under the 1990 LRDP, as well as the allocation of a portion of this previously-approved square footage to the residential uses proposed as the NHIP. Analysis of the existing HBT, and impacts of changes in scheduled bus service undertaken by bus companies, is not required in this EIR. The HBT is not an element of the 2002 LRDP, because it has existed in operation at its current location since the 1930s and no changes are

proposed as part of the 2002 LRDP. In addition, as stated in the 2002 LRDP Draft EIR (Volume 1, page 4.13-16), UCLA does not own or operate the buses utilizing the HBT, and does not control bus schedules or the level of bus operations. While, as discussed below, UCLA is working with the community and bus companies to address neighborhood concerns, for these reasons, it is beyond the scope of the 2002 LRDP Draft EIR to analyze the effects of existing bus operations at the HBT, and CEQA does not impose this requirement. See *Fat v. County of Sacramento*, 97 Cal. App. 4th 1270 (2002) (environmental effects of existing operations are part of the baseline environmental conditions, not effects of the proposed project). CEQA also does not require EIRs to analyze the environmental effects of existing activities that are not proposed to be changed as a result of the project under consideration. See, for example, *Black Property Owners Association v. City of Berkeley*, 22 Cal. App. 4th 974 (1994) (requiring an EIR to analyze effects of existing conditions [as distinct from project-related changes] would not further the purpose of CEQA to inform the public and responsible officials of the environmental consequences of their decisions before those decisions are made).

Consistent with the CEQA requirement to review potential environmental changes associated with the 2002 LRDP, the 2002 LRDP Draft EIR addresses the potential for the 2002 LRDP to increase demand for bus transportation to and from campus over existing conditions. However, as shown on Table 4.13.3 (Current Estimated Bus Capacity [SMMBL and Culver City Lines Serving UCLA]) and Table 4.13-4 (Current Estimated Bus Capacity [MTA Lines Serving Westwood]) (Volume 1, pages 4.13-13 and 4.13-15), buses operating to and from campus are currently under capacity. With implementation of the 2002 LRDP, demand for public transit during the regular session would decline slightly when compared to existing conditions due to the increase in on-campus student housing anticipated as a result of the Northwest Housing Infill Project (NHIP). See discussion under Impact 4.13-14 (Volume 1, pages 4.13-95 to 4.13-96). Transit demand during the summer session could slightly increase compared to existing conditions. However, such summer session demand would remain substantially lower than regular session levels and would not necessitate any additions to current service levels. See discussion under Impact LRDP 4.13-15 (Volume 1, pages 4.13-96 to 4.13-97). Accordingly, the 2002 LRDP Draft EIR concludes that existing bus service would be adequate to serve demand under the 2002 LRDP, and thus the 2002 LRDP would not result in a significant physical change in the environment resulting from additional bus service at the HBT.

The campus, however, understands neighborhood concerns about bus activity at the HBT, and is continuing its efforts to work with the community and transit agencies to address these concerns. Since April 2002 when the neighborhood issues were raised during the LRDP EIR Scoping process, several meetings sponsored by the campus have been held with residents, the transit agencies and local community elected representatives to discuss concerns over operations at the HBT.

The following information is provided to summarize the results of UCLA's efforts to coordinate and facilitate changes to the existing conditions at the HBT. While not related to the 2002 LRDP or the CEQA process for the 2002 LRDP Draft EIR, since April 2002, the following steps have been taken by the bus companies to reduce neighborhood complaints about bus traffic at the HBT:

1. During summer 2002, the Culver City Bus Company agreed to re-route all of its buses from the Terminal and to exclusively use the UCLA Ackerman turnaround instead of the HBT. This has resulted in a daily decrease of approximately 70 buses at the HBT.
2. At the beginning of the current fall quarter, the Big Blue Bus (Santa Monica Busline) re-directed Line 16, which originates in the vicinity of Overland/National and is routed on Westwood Blvd., directly to the Ackerman turnaround. None of these Express buses (21 daily) use the HBT.
3. At the beginning of the 2002 fall quarter, the MTA eliminated all buses laying-over at the Terminal (4 daily). The MTA continues to stop both north and southbound on Hilgard as part of its citywide service routing, but no longer uses the HBT for layovers.
4. Effective February 16, 2003, the Santa Monica Busline buses using the HBT after 10:00 P.M. and before 7:00 A.M. (approximately 16 buses), will be re-routed into the UCLA campus northbound at Westholme, and will remain southbound on Young Drive East between Westholme and Manning before exiting at Manning onto southbound Hilgard. This will effectively eliminate all buses using the HBT between 10:00 P.M. and 7:00 A.M. seven days a week.

In total, these changes facilitated by UCLA will result in the elimination of all bus layovers in the early morning and late evening and a reduction in the number of buses using the HBT by approximately 90 buses per day. This is a significant decrease in bus volumes, and achieves the stated goal of some neighborhood representatives to reduce bus volumes to below weekday 1990 levels. In addition, the campus will continue to work closely with the community, transit agencies, and elected officials on these issues and will continue to collaborate with all parties involved to explore other viable short and long-term options for reducing concerns relating to bus activity at the HBT.

On December 12, 2002, UCLA campus officials met with several of the commenters to review the initiatives described above. These commenters subsequently expressed appreciation for the efforts facilitated by UCLA and were encouraged by UCLA's activities to work with the transit agencies.

Topical Response C—Allocation of Enrollment Growth to the UCLA Campus

A number of commenters have raised concerns regarding the University of California's efforts to plan for increased enrollment throughout the University of California system, and the proposed allocation of enrollment growth among the various campuses that comprise the University of California system, including UCLA. This response addresses Comments 5-3, 7-3, 8-2, 8-3, 8-5, 9-15, 12-5, 12-8, 12-9, 12-18, 12-52, 12-58, 12-59, 12-60, 13-1, 13-2, 14-2, 19-3, 19-4, 19-5, 19-6, 19-7, and T-32.

Some commenters indicate that the University of California should have evaluated proposed enrollment growth systemwide under CEQA or evaluated accommodating growth at other campuses besides UCLA. CEQA expressly provides that the environmental impacts of changes in enrollment levels are to be assessed at the campus level as part of the LRDP process for each campus. See Public Resources Code Section 21080.09(b). CEQA does not require environmental analysis for systemwide University enrollment planning studies, or for allocating enrollment among the various campuses that comprise the University of California system. *Id.*

The Enrolled Bill Report for the legislation enacting Public Resources Code Section 21080.09 (Senate Bill 896, Mello) clarifies that the intent of the bill was to ensure that CEQA evaluation of student enrollment changes should be addressed at each campus individually as part of the LRDP process, and not on a statewide or systemwide basis. The bill's author stated that the bill "clarifies the intent of existing law that the appropriate place for environmental review of the impact of academic and enrollment plans under CEQA is in a Long Range Development Plan EIR...for the particular campus or medical center where the environmental impact actually takes place" and not on a "statewide, systemwide basis". See letter dated September 12, 1989, from State Senator Henry J. Mello to Governor George Deukmejian.

Other commenters have asked for more information about University of California enrollment planning figures. In 1998, the State Legislature requested that the University of California conduct a feasibility study to assess the ability of the University of California to accommodate projected enrollment through the year 2010. See Item 6440-001-0001 of the Supplemental Report of the 1998 Budget Act. The feasibility study, completed in 1999, looked at whether future enrollment demand would exceed expected capacity, and if so, how the University of California would evaluate options for accommodating future demand, with particular emphasis on providing University of California access using available resources. See *Options for Expanding Enrollment Capacity at the University of California*, Report to the Legislature, March 1999 ("1999 Report"). The 1999 Report described a gap between the number of students the University of California would be able to accommodate in 2010 within existing campus LRDP parameters (i.e., approximately 40,000 more FTE), and projected levels of possible enrollment demand (i.e., approximately 63,000 FTE). The 1999 Report found this gap could exceed 23,000 full-time-equivalent (FTE) graduate and undergraduate students. The 1999 Report also examined options for accommodating these additional students. In addition, the 1999 Report stated that the University of California would remain dedicated to its commitment of educating the top 12.5 percent of California's public high school graduates who wish to attend University of California schools.

In April 2000, the University of California released a feasibility report on year-round instruction. See *University of California, the Feasibility of Year-Round Instruction within the University of California*, April 2000

("2000 Report"). Both the 1999 and 2000 Reports explore the options available to address the increases expected in undergraduate and graduate enrollment. For the purposes of future planning, the University of California suggested enrollment targets for each of the existing University of California campuses, which identified increases at each campus over the then-existing (1998–99) campus enrollment. Table III-2 displays those suggested targets.

Table III-2 University of California Suggested Enrollment Targets General Campus Budgeted FTE		
<i>Campus</i>	<i>1998–99</i>	<i>2010–11</i>
Berkeley	27,800	31,800
Davis	20,300	26,400
Irvine	15,700	27,600
Los Angeles	28,500	32,900
Merced	—	5,000
Riverside	9,550	19,900
San Diego	16,850	27,600
Santa Barbara	17,880	21,900
Santa Cruz	10,420	16,900
Total	147,000	210,000

Source: Accommodating Title Wave II: Elements of Current Planning, February 10, 2000

The percentage increase reflected by the suggested enrollment target for each campus is shown in Table III-3.

Table III-3 University of California Suggested Enrollment Targets General Campus Budgeted FTE Percentage Increase (1998–99 to 2010–11)		
<i>Campus</i>	<i>Percentage Increase in Enrollment</i>	<i>Percentage of Suggested Systemwide Enrollment Target</i>
Berkeley	14.3	6.4
Davis	30.0	9.7
Irvine	75.7	18.9
Los Angeles	15.4	6.4
Merced	—	8.0
Riverside	108.0	16.4
San Diego	63.7	17.0
Santa Barbara	22.4	6.5
Santa Cruz	62.1	10.2
Average Increase	43.0	100.0

Percentages approximate due to rounding.

In proposing future enrollment increases among the campuses in the University of California system, factors such as the need to grow on a systemwide basis, the physical ability of each campus to accommodate growth, feasible rates of growth and feasible proportions for growth relative to base enrollment at each campus, demographic issues, and other factors were considered. The new tenth campus of the University of California in Merced will also accommodate a portion of the currently projected increases in enrollment.

Feasibility and planning studies such as the reports mentioned above are subject to a statutory exemption from CEQA. See Public Resources Code Section 21102, *CEQA Guidelines* Section 15262 (exemption for state-level feasibility or planning studies for possible future actions that a State agency, board, or commission has not approved, adopted, or funded).

A number of commenters suggested that the University should reduce the amount of additional student enrollment proposed at UCLA, and instead increase enrollment at other campuses. As shown in Tables 1 and 2 above, the University of California's proposals for accommodating future enrollment growth already allocate a substantial majority of the projected increase in student population to other University of California campuses. For example, the proposed increase in enrollment at the Riverside campus is 10,350 FTE, or 108 percent over 1998–99 enrollment and 16 percent of the suggested increase in enrollment through 2010–11 systemwide. The Irvine campus is considering a proposed increase of 11,900 FTE, or a 75 percent increase over existing enrollment and 19 percent of the suggested systemwide increase. The average proposed increase among the campuses of the University of California system is 43 percent. The proposed allocation of an additional 4,000 FTE to the UCLA campus represents an increase in campus student enrollment of 15.4 percent from 1998–99 and only 6.4 percent of the suggested systemwide increase, which is the second-lowest percentage increase suggested for all of the existing University of California campuses with undergraduate programs.

Many of the comments on this issue submitted in the 2002 LRDP Draft EIR appear to assume that the University has already made a binding commitment to increase enrollment at the UCLA campus by 4,000 FTE by 2010. As the suggested enrollment target would exceed the student enrollment projections described in the 1990 LRDP, the 2002 LRDP, and the 2002 LRDP Draft EIR have been prepared in compliance with Public Resources Code Section 21080.09 to analyze the potential environmental impacts of accommodating a proposed increase of 4,000 FTE at the UCLA campus. Unless and until The Regents adopts the 2002 LRDP, the University has not made a commitment to increase enrollment at the UCLA campus beyond the level identified in the 1990 LRDP, and analyzed in the 1990 LRDP Final EIR, as amended in November 2001. As discussed above, Public Resources Code Section 21080.09 specifies that the University shall conduct CEQA review at the campus level and not at

the systemwide level for proposed enrollment level changes. The environmental analysis contained in the 2002 LRDP EIR properly analyzes the proposed enrollment changes for the UCLA campus and was prepared in full accordance with all substantive and procedural requirements for a legally adequate EIR, including, but not limited to, the requirements set forth in CEQA and the *CEQA Guidelines*.

Topical Response D—Bicycle Commuting Conditions and Facilities

The University received a number of comment letters on the 2002 LRDP Draft EIR that raised concerns with the University's commitment to bicycle commuting, the value of bicycle commuting in achieving transportation goals and bicycle infrastructure. The University is sensitive to the bicycling community and recognizes the value and importance of bicycling as an alternate means of transportation to campus. Due to the importance of these issues, this topical response is provided to address the overall concerns raised in these letters. This topical response addresses Comments 22-1, 22-2, 22-3, 22-4, 23-1, 23-2, 23-3, 23-5, 24-1, 24-2, 25-1, 25-2, 26-1, 26-2, 26-3, 26-4, 27-1, 27-2, 28-1, 28-2, 29-1, 29-2, 82-1, 103-1, 162-1, 338-2, 342-2, 357-1, and 373-1.

As indicated in the 2002 LRDP Draft EIR (Volume 1, page 4.13-16), bicycling is an integral part of UCLA's Transportation Demand Management (TDM) Program. UCLA's TDM Program began in 1984 with the mission of using parking fees and other UCLA resources to achieve cost-effective reductions in campus trip generation and parking demand, while increasing mobility options for faculty, staff and students. Since its inception, the TDM program has expanded into a comprehensive program that offers a broad range of services to encourage and assist UCLA commuters in utilizing alternatives to the single-occupancy vehicle. As part of its ongoing TDM Program, UCLA actively provides and promotes accommodation of the use of other modes of transit including bicycles, motorcycles, and scooters; shuttle buses; vanpools; carpool matching and parking reduction incentive programs; and alternate work schedules and telecommuting. All of these components together help achieve the transportation management goals of trip generation and parking demand reduction.

UCLA has received numerous awards for its TDM Program results. In 2000, UCLA's TDM Program achieved a 12 percent reduction below the 1990 recorded commute trips for faculty and staff. In addition, between 1990 and 1999, the TDM Program increased the campuswide Average Vehicle Ridership (AVR)¹ from 1.26 to 1.42. By spring 2000, UCLA achieved an AVR of 1.51, exceeding the goal of 1.5 set by the Southern California Air Quality Management District (SCAQMD) and continues to exceed this goal.

¹ The AVR is the ratio of employees arriving between 6 A.M. and 10 A.M. to the motor vehicles they drive to campus.

The TDM Program is promoted through various venues including the UCLA Commuter Guide, which is published by UCLA Transportation Service's Communications & Marketing group. This is a comprehensive information source describing transportation options at UCLA including bicycling. The Commuter Guide is distributed to all incoming students, faculty, and staff. In addition, all of UCLA's departmental parking coordinators receive copies of the updated Commuter Guide for distribution each spring, when faculty and staff make decisions regarding annual parking permit renewal. UCLA also publicizes the availability and convenience of alternative transportation modes to campus through the Transportation Services Website (www.transportation.ucla.edu), information within the General Catalog and admissions packets sent to students, advertisements in the *Daily Bruin*, annual orientation fairs, and presentation and distribution of information at new student and employee orientation sessions. Also, UCLA promotes the statewide "Bike to Work Day" with a Bicycle Fair in the third week of May, which is co-sponsored by UCLA Transportation Services and the UCLA Bicycle Advisory Committee. The event provides free bicycle tune ups, and distributes bicycling safety and commuting information. In addition, the campus sponsors an annual Transportation Fair in the fall promoting alternative modes of transportation including bicycling.

The University remains committed to and supportive of bicycling as a convenient, healthy alternative mode of transportation. In support of this commitment, the University provides more than 2,000 bicycle parking spaces at over sixty locations across the campus. Locker and shower facilities are available for use by students and faculty and staff with recreation cards, including bicyclists, at the John Wooden Center, the Sunset Canyon Recreation Center, and the Rehabilitation Center. In addition, the Men's Gym and Kaufman Hall structures will have locker and shower facilities. Both structures are currently under reconstruction with scheduled completion by summer of 2003 for Men's Gym and spring 2004 for Kaufman Hall. Bicycle facilities such as parking and lighted spaces are provided near new or renovated buildings. For example, the Southwest Graduate Student Housing Project, currently under construction, and the proposed Northwest Housing Infill Project (NHIP) have included provision for bicycle parking. Further, no automobiles will be allowed within the new courtyards between the NHIP buildings to provide a safe environment for bicyclists and pedestrians.

The Transportation Services Department routinely observes bicycle commuting patterns at the different parking locations on campus and moves bicycle racks accordingly. The Department also routinely inspects bicycle racks for abandoned bikes. This inspection generally occurs during the winter and summer breaks (December and June) in order for staff to discern abandoned bicycles. Bicycles that appear to be abandoned are posted with an impoundment notification and then removed. These bicycles are impounded for 90 days and, if not claimed, are auctioned by the University of California Police Department.

The University acknowledges that narrow streets in the vicinity of campus, existing traffic volumes on streets in Westwood, and major arterials, such as Wilshire Boulevard and the I-405 Freeway, pose impediments to the use of bicycles as a commuting option. The University continues to seek feasible opportunities to improve and enhance the bicycling infrastructure that serves the campus. For example, new buildings proposed for the campus often include provision of bicycle facilities and well lighted spaces that promote safe bicycle travel. In addition, new building designs incorporate bicycle infrastructure improvements, when feasible. For instance, the design of the Academic Health Center (now under construction) was modified to increase the setback along the east side of Gayley Avenue to accommodate an extension of the existing bicycle lane by the City of Los Angeles along this roadway. Once completed, the bicycle lane will extend north along Gayley to the campus entrance at Strathmore Place. Further, the University continues to work with agencies, such as the City of Los Angeles, Los Angeles County Metropolitan Transportation Authority (MTA), and the Southern California Association of Governments (SCAG) regarding regional bicycle planning. For example, the University supports regional bicycle routes that benefit the UCLA bicycling community such as those associated with the Santa Monica Boulevard and Little Santa Monica project. This project will merge the two streets into one and will include a landscaped median and designated bike route.

While bicycle issues such as access and parking have been consistently addressed incrementally by UCLA Transportation Services Department, a comprehensive bicycle plan has not yet been developed for the campus. However, the UCLA Transportation Services Department is committed to the development of such a plan and will work with student groups such as the UCLA Bicycle Advocacy Committee and the UCLA bicycling community to develop a bicycle long range plan. The campus commitment to prepare a bicycle long range plan has been added to the 2002 LRDP Final EIR and MMRP as Mitigation Measure 4.13-0.

As demonstrated, bicycling has been and continues to be integral in meeting transportation goals to reduce trip generation and parking demand and the University remains committed to bicycling as an alternative mode of transportation to campus.

Topical Response E—Opportunity to Submit Public Comments

A number of commenters have indicated their belief that UCLA has failed to comply with the requirements of CEQA and the 2002 *University of California CEQA Handbook* (CEQA Handbook) relating to the opportunity to submit public comments on the 2002 LRDP Draft EIR. As discussed below, UCLA has provided adequate opportunity for the public to review the 2002 LRDP Draft EIR, and to prepare and submit comments. This topical response addresses Comments 8-1, 10-1, 10-2, 10-3, 10-4,

10-5, 11a-1, 12-2, 12-3, 12-47, 12-48, 12-50, 12-51, 12-54, 12-55, 12-71, 12-98, 12-99, 33-2, 34-3, 190-2, 206-2, T-16, T-17, T-18, T-22, T-33, T-34, T-35, T-36, T-40, T-41, T-43, and T-45.

Under CEQA and the State *CEQA Guidelines*, the normal public review and comment period for a draft EIR is 45 days. See Public Resources Code Section 21091(a), *CEQA Guidelines* Section 15205(d). See also Office of Planning and Research, *State Clearinghouse Handbook* ("the standard review period for a Draft EIR submitted to the State Clearinghouse is 45 calendar days"). The 2002 LRDP Draft EIR was submitted to the State Clearinghouse on October 31, 2002, and the public comment period was from November 1, 2002, through December 16, 2002. In response to a community request, the comment period was extended until December 20, 2002. The resulting comment period of 50 calendar days exceeds the requirements of CEQA. UCLA has afforded the public adequate opportunities to comment on the 2002 LRDP Draft EIR, and an additional extension of the public review period is not necessary.

CEQA does not prohibit or even discourage the distribution of draft EIRs when a public holiday would occur during the public comment period. As a practical matter, this would be virtually impossible, as almost every 45-day period within the twelve-month calendar would encompass a designated public holiday. Section 2.3.9 of the *University of California CEQA Handbook* states that "when scheduling the public review period, [the University should] be cognizant of the academic calendar. Review periods during finals, the summer, or over holiday periods may be criticized if faculty, students, or the public do not feel they have an adequate opportunity to comment." The review period for the 2002 LRDP Draft EIR occurred during the fall quarter on the academic calendar, which is traditionally the quarter of highest campus enrollment. Consequently, the period provided the review opportunity to the greatest number of students. The comment period also began well before the start of final examinations, and continued for over a week after the conclusion of final examinations, allowing students, faculty, and other interested individuals ample opportunity to review and comment on the 2002 LRDP Draft EIR without impacting academic priorities. The *CEQA Handbook's* reference to "holiday periods" refers to periods in the academic calendar when classes are not in session, rather than designated federal or State public holidays. However, because the public comment period was scheduled over the Veterans Day and Thanksgiving holidays, an extension of the comment period was provided in this particular case to account for these holidays.

On June 12, 2001, UCLA filed a Notice of Preparation (NOP) for the 2002 LRDP EIR. A revised NOP (including an Initial Study) was subsequently filed on March 20, 2002, to acknowledge that the potential environmental effects of both the 2002 LRDP and the proposed NHIP would be considered in a single EIR. The 30-day public review period for the revised NOP ended on April 19, 2002.

Although not required by CEQA, a Community Information and EIR Scoping Meeting for the proposed project was also held on April 6, 2002, to solicit input from interested agencies, individuals, and organizations regarding the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in the EIR. This meeting provided a forum for interested parties to submit comments on the project and on issues that should be analyzed in the EIR. Refer also to Response to Comment 12-98 for more information regarding the scoping meeting.

During the public review period, copies of the 2002 LRDP Draft EIR were distributed to public agencies through the State of California, Office of Planning and Research. UCLA also directly distributed the document to over 80 individuals, agencies, and organizations. Copies of the 2002 LRDP Draft EIR were also available for review at two on-campus libraries and nine off-campus libraries. In addition, the 2002 LRDP Draft EIR and the documents referenced in the 2002 LRDP Draft EIR were available for public review on UCLA's website and during normal business hours at the UCLA Capital Programs Building. UCLA Capital Programs received approximately 370 written comment letters on the 2002 LRDP Draft EIR and the proposed project. These include 6 letters from four State, regional, and local public agencies; 9 letters from seven organizations; and 354 letters from 349 individuals. In addition, although not required by CEQA, the amended University Procedures for Implementation of the California Environmental Quality Act (Section 2.3.10) require a public hearing during the public review period for a draft EIR, which was held on November 20, 2002, at 7:00 P.M. on the UCLA campus, during which the public was given the opportunity to provide comments on the 2002 LRDP Draft EIR. Nine persons presented verbal comments on the proposed project and the 2002 LRDP Draft EIR during the public hearing.

The public hearing was held in the evening to make the meeting available to those who work a standard schedule and to those students and faculty who are generally in class during the daytime. The hearing was not scheduled during any exam period. The hearing was scheduled midway through the public review period to allow commenters time to review the 2002 LRDP Draft EIR prior to attending the hearing, while still allowing further time to submit comments after the hearing. The hearing was not scheduled particularly close to the beginning or the end of any quarter, and was held during the quarter that traditionally has the highest campus enrollment (fall). Therefore, the University strived to schedule the public hearing at a time that was most convenient for anyone wishing to attend.

Finally, the campus regularly conducts Community Leader Information Meetings several times a year. These meetings are intended to provide information on proposed upcoming projects and events and to obtain community input on those proposals. With respect to development of the 2002 LRDP and 2002 LRDP Draft EIR, community meetings occurred on July 10, 2001, January 30, 2002, and November 7,

2002. Although one commenter objected to the timing of the public hearing, indicating that it should not have been held midway through the public review process, CEQA does not require that a public hearing be held at all. In addition, the commenter did attend the public meeting and provided comments.

In addition, the campus met with representatives of the Westwood Hills Property Association (WHPOA) on August 16, 2001, March 6, 2002, and May 20, 2002, to discuss the NHIP. As a result of these meetings, the NHIP was altered to accommodate concerns of the WHPOA whereby the parking structure was moved from the proposed location at Lot 15 to its current proposed site, south of Dykstra Hall. Additionally, the campus committed to retain all mature trees along the western edge of Lot 15 in order to maintain the existing landscape to visually screen the proposed recreation facility from view by the residents west of Veteran Avenue. Finally, concerns were raised regarding potential noise generated by the proposed NHIP recreation facility and existing noise measurements were taken from the home of a WHPOA representative. These noise measurements were incorporated and analyzed in the 2002 LRDP Draft EIR. Refer also to Responses to Comments 9-2 and 9-14 for a discussion of the NHIP, as currently proposed.

Finally, the presentation of the 2002 LRDP Draft EIR in two separate volumes (excluding appendices) was not intended to impose an additional burden on the public in terms of the ability to review and comment upon the document. Rather, since the 2002 LRDP and NHIP constitute the proposed project, in accordance with CEQA, the analysis of both, or the "whole of the action" as referenced in Section 15378 of the *CEQA Guidelines*, is required. While the impacts of the NHIP are included within the analysis of the LRDP as a whole provided in Volume 1, presenting the impact analysis of the NHIP in a separate Volume 2 was intended to facilitate public review by making it easier to identify and comment upon specific impacts relating to the NHIP. For this reason, the issuance of separate volumes of the 2002 LRDP Draft EIR does not necessitate or justify a further extension of the comment period.

2. Individual Responses to Comments

The following section contains all of the responses to individual comments received on the 2002 LRDP Draft EIR, isolated by individual commenter. All of the original comment letters, in their entirety, are provided before the responses. Consistent with Sections 15088(a) and 15088(b) of the *CEQA Guidelines*, comments that raise significant environmental issues are provided with responses. Comments that are outside of the scope of CEQA review will be forwarded for consideration to the decision-makers as part of the project approval process. All comments will be considered by The Regents when making a decision on the project.



Gray Davis
Governor

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

Comment Letter 1



Tal Finney
Interim Director

ACKNOWLEDGEMENT OF RECEIPT

DATE: November 19, 2002

TO: Tova Lelah
University of California, Los Angeles
1060 Verteran Avenue, CPB 3rd Floor
Los Angeles, CA 90095

RE: Long Range Development Plan and Northwest Housing Infill Project
SCH#: 2002031115

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: November 1, 2002
Review End Date: December 16, 2002

We have distributed your document to the following agencies and departments:

California Highway Patrol
Caltrans, District 7
Department of Conservation
Department of Fish and Game, Region 5
Department of Housing and Community Development
Department of Parks and Recreation
Department of Water Resources
Native American Heritage Commission
Office of Historic Preservation
Regional Water Quality Control Board, Region 4
Resources Agency
State Lands Commission

NOV 29 37 PM '02
UCLA

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.

Response to Comment Letter I

Letter from OPR, dated November 19, 2002

Response to Comment I-I

This letter provides acknowledgement that the State Clearinghouse received the 2002 LRDP Draft EIR, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. No response is required.



Gray Davis
Governor

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

Comment Letter 2



Tal Finney
Interim Director

Memorandum

Date: November 25, 2002
To: All Reviewing Agencies
From: Scott Morgan, Project Analyst
Re: SCH # 2002031115
UCLA Long Range Development Plan and Northwest Housing Infill
Project, November 2002

The Lead Agency has extended the review period for the above referenced project to December 20, 2002 to accommodate the review process. All other project information remains the same.

2-1

cc: Tova Lelah
University of California, Los Angeles
1060 Veteran Avenue
Los Angeles, CA 90095-1365

Response to Comment Letter 2

Letter from OPR, dated November 25, 2002

Response to Comment 2-1

This letter provides acknowledgement that the University extended the review period for the 2002 LRDP Draft EIR until December 20, 2002, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. No response is required.

SOUTHERN CALIFORNIA



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Tom Sykes, Walnut • Paul Talbot, Alhambra •
Sidney Tyler, Jr., Pasadena • Dennis Washburn,
Calabasas • Jack Weiss, Los Angeles • Bob
Yousefian, Glendale • Dennis Zine, Los Angeles

Orange County: Charles Smith, Orange County
• Ron Bates, Los Alamitos • Art Brown, Buena
Park • Lou Bone, Tustin • Cathryn DeYoung,
Laguna Niguel • Richard Dixon, Lake Forest •
Alta Duke, La Palma • Shirley McCracken,
Anaheim • Bev Perry, Brea • Tod Ridgeway,
Newport Beach

Riverside County: Bob Buster, Riverside County
• Ron Loveridge, Riverside • Greg Pettis,
Cathedral City • Ron Roberts, Temecula • Jan
Rudman, Corona • Charles White, Moreno Valley

San Bernardino County: Bill Alexander, Rancho
Cucamonga • Lawrence Dale, Barksow • Lee Ann
Garcia, Grand Terrace • Susan Lien, San
Bernardino • Gary Oviatt, Ontario • Deborah
Robertson, Rialto

Ventura County: Judy Mikels, Ventura County •
Glen Becerra, Simi Valley • Carl Morehouse, San
Buenaventura • Toni Young, Port Hueneme

Riverside County Transportation Commission:
Robin Lowe, Hemet

Ventura County Transportation Commission:
Bill Davis, Simi Valley

December 9, 2002

Ms. Tova Lelah
Assistant Director Environmental Planning
UCLA Capital Programs
University of California, Los Angeles
1060 Veteran Avenue, CPB 3rd Floor
Los Angeles, CA 90095

**RE: SCAG Clearinghouse No. I 20020596 UCLA Long Range Development
Plan and Northwest Housing Infill Project**

Dear Ms. Lelah:

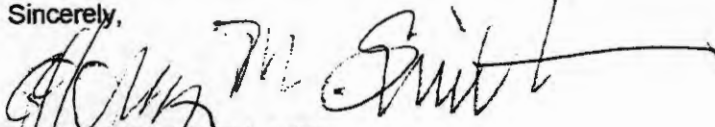
Thank you for submitting the **UCLA Long Range Development Plan and Northwest Housing Infill Project** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **UCLA Long Range Development Plan and Northwest Housing Infill Project**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **November 1-15, 2002 Intergovernmental Review Clearinghouse Report** for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,


JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

Response to Comment Letter 3

Letter from SCAG, dated December 9, 2002

Response to Comment 3-1

This letter states that SCAG determined the project not to be regionally significant, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. No response is required.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, REGIONAL PLANNING

IGR/CEQA BRANCH

120 SO. SPRING ST.

LOS ANGELES, CA 90012

PHONE (213) 897-4429

FAX (213) 897-1337

*Flex your power!
Be energy efficient!*

December 2, 2002

Tova Lelah, Assistant Director
University of California Los Angeles
Capital Programs, Environmental Planning
1060 Veteran Avenue
Los Angeles, CA 90095-1365

Re: 2002 LRDP and Northwest Housing Infill
IGR/CEQA No. 021105/EK
SCH No. 2002031115

Dear Ms. Lelah:

We have received a Draft Environmental Impact Report (DEIR), for the Long Range Development Plan (LRDP) with inclusion of the Northwest Housing Infill. We have comments regarding impacts on the State Highway system, specifically the freeways.

Some additional traffic would be on the main-line freeways, according to tables 27 and 28 of the Transportation System Analysis report, Appendix 4. There seems to be no mention of mitigation for those effects. Although the percentage increase on the main-line freeways might be less than certain County CMP standards for impact mitigation, our State agency is also concerned about cumulative effects of even relatively small impacts. We ask for a statement about some kind of action or contribution towards mitigation for those effects of increased traffic on the freeways due to implementation of the LRDP.

You can view the Caltrans Traffic Impact Study Guide at the following WEB Site:
<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>
regarding impact assessment and mitigation measures.

We briefly state what Caltrans considers deserves mitigation for traffic impacts. In the Guide is further description. Mitigation would be indicated in order to maintain on State facilities either a level of service C or at least (if LOS is less than C) allow no further deterioration (Guide page 1) from the current level of service. The LOS for consideration would be LOS for the most-congested time-period (page 4). Where facility or service improvements would be made, as the preferred mitigation alternative, to accommodate traffic increases due only in part to a development, an equitable share of the costs for such improvements would be due for that development (Guide Appendix B). Because traffic due to new development would displace some traffic from the already-congested state highways, a select-link traffic-model run might be useful to estimate actual share of traffic (Guide page 2, footnote).

We note the positive effects of additional on-campus housing in reducing commuter travel by students. Also, we note campus TDM measures and the limiting of parking spaces. Should there be measures further or other than mentioned in the DEIR, that could be implemented to mitigate the demand for use of freeway facilities at times of their congestion, we would appreciate receiving word of them.

4-5

Extensive trucking activity might at times be associated with construction and with equipping new facilities, for implementing the LRDP. Therefore we remind you that transportation of heavy construction equipment and/or materials, or other special equipment, which requires the use of oversized-transport vehicles on State highways would require a Caltrans transportation permit. We recommend explicit consideration and development of truck-management plans, if and when needed. We ask for planning to avoid disruption of traffic especially during peak-use periods on significant-use highways.

4-6

If you have any questions regarding these comments, please refer to IGR/CEQA Number 021105/EK and contact me at (213) 897 - 4429 .

4-7

Sincerely,



STEPHEN J. BUSWELL
IGR/CEQA Program Manager
Office of Regional Transportation Planning

cc: Becky Frank, State Clearinghouse

Response to Comment Letter 4

Letter from California Department of Transportation, District 7 Regional Planning, dated December 2, 2002

Response to Comment 4-1

This comment is acknowledged. This comment contains introductory information, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. Therefore, no response is required.

Response to Comment 4-2

Pursuant to State law, the Los Angeles County Congestion Management Agency has authority to establish thresholds for determining impacts to State designated highways, including freeways in the project study area, and has done so through the adoption of the 1999 Congestion Management Program (CMP). As indicated in the 2002 LRDP Draft EIR (Volume 1, page 4.13-36), a significant effect would occur if project-related traffic conditions would:

...[e]xceed, either individually or cumulatively, a level of service standard established by the County Congestion Management Agency for designated roads or highways.

The CMP defines regional project impacts as significant (in terms of contribution to the cumulative impact) if a project results in an increase in the demand to capacity ratio of more than 0.020 (2 percent) and the final LOS is F. As discussed under Impact LRDP 4.13-4 in the 2002 LRDP Draft EIR (Volume 1, page 4.13-82):

Although all of the analyzed freeway segments would be operating at LOS E or F in one or both peak hours, the San Diego Freeway (I-405) and the Santa Monica Freeway (I-10) would not experience an increase in traffic volumes of two percent or greater, and, therefore, the impact of implementation of the proposed 2002 LRDP would be less than significant on the regional highway network. No mitigation is required.

As indicated in Table 4.13-18 of the 2002 LRDP Draft EIR, the maximum contribution of the 2002 LRDP to increases in traffic volume on the two CMP roadways analyzed (the San Diego and Santa Monica Freeways) is 0.003 percent. Because the increase in vehicle trips resulting from implementation of the 2002 LRDP would not exceed the designated standard of significance for State highways identified in the CMP, no significant impact would result, and no mitigation is required.

The University acknowledges Caltrans's concern regarding cumulative traffic conditions. However, the Los Angeles County CMP analysis is designed to present a cumulative scenario that considers the impact of single projects in the context of cumulative traffic demand on CMP roadways. It is possible, as acknowledged by the 2002 LRDP Draft EIR, that traffic impacts created by regional growth will combine to exceed the CMP standard of significance, and to the extent that this occurs, a significant cumulative impact would be the result. While regional growth in general may result in additional and

potentially significant increases in traffic volume on these CMP roadways, the contribution of the 2002 LRDP is not cumulatively considerable and thus is less than significant. As noted in the 2002 LRDP Draft EIR, UCLA has a long history of implementing programs, practices and procedures intended to reduce vehicular trip generation and increase use of alternative modes. These include the establishment of the Commuter Assistance—Ridesharing (CAR) department in 1984, the adoption of a Transportation Systems and Demand Management program in 1987, the adoption of the 1990 Long Range Development Plan, which established caps on vehicle trips and parking spaces, proposed a substantial expansion of on-campus housing and codified elements of the TDM program as mitigation measures in the environmental impact report. As noted in the 2002 LRDP Draft EIR (Volume 1, page 4.13-17):

As a result of these various initiatives, the TDM program has reduced faculty and staff parking demand by more than 12 percent (below 1990 LRDP levels). In addition, since 1990, when the SCAQMD first required a survey of all employees to determine Average Vehicle Ridership² (AVR), the TDM program increased the campuswide AVR from 1.26 to 1.51 by spring 2000, exceeding the goal of 1.5 set by the SCAQMD. Currently, approximately 1,000 active carpools serve over 2,300 participants, and over 130 vans cover more than 85 communities and accommodate approximately 1,425 monthly full-time riders.

The 2002 LRDP Draft EIR reaffirmed the campus commitment to continue these efforts: PP 4.13-1(a) commits the campus to maintain the vehicle trip cap of 139,500 average daily trips; PP4.13-1(b) maintains the on-campus parking cap at 25,169 spaces; PP 4.13-1(c) continues expansion on on-campus housing; and PP 4.13-1(d) commits the campus to continued implementation of the TDM program. These actions underscore the campus's commitment to reduce the number of students that must commute to campus, encourage the use of alternative transportation modes, and reduce overall vehicle trip generation and thereby reduce the campus's contribution to cumulative traffic conditions.

Response to Comment 4-3

The University acknowledges receipt of the Caltrans Guide for the Preparation of Traffic Impact Studies (dated June 2001). It should be noted that the Caltrans guide provides trip generation thresholds for determining when a traffic study is required, but does not address the methodology for determining when an impact to a State highway is deemed significant, which would require mitigation. However, in response to the Notice of Preparation for the 2002 LRDP Draft EIR, Caltrans provided a comment letter that requested that the traffic analysis in the 2002 LRDP Draft EIR provide:

1. Assumptions and methods used to develop trip generation/distribution percentages and assignments.
2. An analysis of ADT, A.M. and P.M. peak-hour volumes for both the existing and future (expected project build out) conditions. This should include both the I-405 and I-10, affected ramps, streets, crossroads, and controlling intersections (i.e., Wilshire Boulevard/Veteran Avenue). This analysis

² The AVR is the ratio of employees arriving between 6 A.M. and 10 A.M. to the motor vehicles they drive to campus.

should include project traffic, cumulative traffic generated for all approved developments in the area, Interchange Utilization (I.C.U.) and Level of Service (LOS) of affected freeway ramp intersections on the State Highway.

3. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation measures discussions should include, but not be limited to the following:
 - Financing
 - Scheduling considerations
 - Implementation responsibilities
 - Monitoring plan
4. Any assessment fees for mitigation should be of such proportion as to cover mainline highway deficiencies that occur as a result of the additional traffic generated by the project.

The traffic analysis in the 2002 LRDP Draft EIR provided (1) a discussion of assumptions and methods used and (2) an analysis of ADT and A.M. and P.M. peak hour conditions for existing conditions, future without project, and future with project conditions for 58 study intersections (and freeway ramps) and for two freeway segments. As noted above in Response to Comment 4-2, because project-related traffic would not result in traffic increases for the freeway segments analyzed that exceed the established significance threshold, no discussion of mitigation measures was required.

The traffic analysis included in the 2002 LRDP Draft EIR provided the information requested by Caltrans in the response to the Notice of Preparation filed by the University and utilized the significance threshold established by the Los Angeles Congestion Management Agency, which has the legal authority to establish such thresholds for State highways within the County of Los Angeles.

Response to Comment 4-4

The comment suggests that a "...select link traffic analysis might be useful to estimate the actual share of traffic..." that utilize freeways adjacent to the UCLA campus. Consistent with CEQA, the 2002 LRDP Draft EIR analyzed the impact of the proposed project (implementation of the 2002 LRDP) on local streets, affected freeway ramps, and the two most-proximate freeway segments.

As noted in the Guide for the Preparation of Traffic Impact Studies (dated June 2001) on page 1, Section II:

Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and "D"...on State highway facilities, however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS.

As noted above in Response to Comment 4-3, the traffic analysis included in the 2002 LRDP Draft EIR utilized the significance threshold established by the Los Angeles County Congestion Management Agency, which has the legal authority to establish such thresholds for State highways within the County of

Los Angeles. This traffic analysis addressed the potential for project-related traffic to impact both the I-405 and I-10 Freeways during peak traffic periods and determined that no significant impacts would result from implementation of the 2002 LRDP. Because this analysis indicates that the impacts of the 2002 LRDP on these freeways are less than significant, no mitigation is required.

A select-link traffic analysis would identify all vehicle trips generated by the UCLA campus that utilized either (or both) the I-405 and I-10 Freeways, not just those trips associated with implementation of the 2002 LRDP. As noted above, the traffic analysis in the 2002 LRDP Draft EIR analyzed the impacts of trips that would result from implementation of the 2002 LRDP, consistent with the requirements of CEQA. Therefore, a select-link traffic analysis is not the appropriate analytical method for the 2002 LRDP EIR. Refer also to Response to Comment 4-2.

Response to Comment 4-5

Inclusion of PP 4.13-1(d) in the 2002 LRDP Draft EIR (Volume 1, page 4.13-94) committed the campus to meet the AVR and trip reduction requirements established by the SCAQMD throughout the planning horizon of the 2002 LRDP. Although the current elements of the TDM program were described in the 2002 LRDP Draft EIR, PP 4.13-1(d) acknowledged that the elements of the program are subject to change. UCLA has implemented a comprehensive TDM program for almost two decades, which has substantially reduced parking demand and trip generation and achieved and exceeded the AVR and trip reduction requirements mandated by the SCAQMD, and other measures may be implemented in the future. To the extent that new measures would substantively reduce campus-related traffic on nearby freeways, the University will notify Caltrans of such measures as requested.

Response to Comment 4-6

The University acknowledges that the use of oversized-transport vehicles requires a Caltrans transportation permit. Standard construction contract provisions require contractors to obtain all necessary permits and approvals regarding construction practices, including transportation permits as appropriate.

Inclusion of PP 4.13-3 in the 2002 LRDP Draft EIR (Volume 1, page 4.13-81) commits the campus to continue the practice of assessing the 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. Such an analysis would also consider the potential for construction vehicles to result in peak hour impacts on the State highway system.

Response to Comment 4-7

This comment is acknowledged.

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7, REGIONAL PLANNING
 IGR/CEQA BRANCH
 120 SO. SPRING ST.
 LOS ANGELES, CA 90012
 PHONE (213) 897-4429
 FAX (213) 897-1337

Comment Letter 5

*Flex your power!
 Be energy efficient!*

December 5, 2002

Tova Lelah, Assistant Director
 University of California Los Angeles
 Capital Programs, Environmental Planning
 1060 Veteran Avenue
 Los Angeles, CA 90095-1365

Re: 2002 LRDP and Northwest Housing Infill
 IGR/CEQA No. 021212/EK
 SCH No. 2002031115

DEC 5 2 20 11 02

Dear Ms. Lelah:

This is a supplementary letter following our letter of December 2 on the Draft Environmental Impact Report (DEIR), for the Long Range Development Plan (LRDP) with inclusion of the Northwest Housing Infill. We have comments regarding potential long range actions for reducing impacts on the State Highway system, especially on freeways. What we suggest might not be fully implemented in the current planning cycle, but we request that certain approaches could at least be investigated and started in the near term and could result in availability of new kinds mitigation for the next planning cycle.

5-1

Mostly, these actions involve developing agreement in, and cooperation with, the larger sub-regional community for transportation improvements. Within some circles, there might be disinclination to accommodate further development in an already very congested sub-area of the urban region. Possibly, accommodation for UCLA could be acceded to on the basis of the exceptional regional, national, and even world-wide importance of the particular research and cultural activities that might be possible only in the geographic context of their concentration in a setting such as the UCLA campus.

5-2

Aside from the foregoing paragraph, we nevertheless strongly request consideration of the following question, for the long term: Could the University promote diversion of some growth, or moving of some existing research and educational activity, to campuses and other locations that are less impacted by urban development and traffic congestion? Growth in some kinds of research/educational activity could be balanced by reduction in other kinds, at the particular campus location.

5-3

Returning to the matter of community involvement, we suggest that the University take the lead in promoting mobilization of civic support for transportation improvements. For mitigation approaches discussed in the following paragraphs, such support is necessary.

5-4

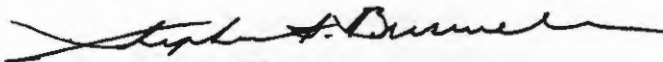
One kind of improvement that could directly mitigate impacts is better performance of certain surface-street roads as alternatives to the freeways. Lane capacity could be added to parallel roads, perhaps in conjunction with adding modest compensatory off-street parking capacity. Given the severe congestion of freeways such as I-405, some traffic would be diverted to such local roads if they function substantially better. Improvements of such kind would require building of community support in the sub-regional area, through various organizations and means.

Strong campus TDM measures exist, but could these be supplemented by strong TDM district-wide measures, possibly including geographically the entire quadrant north-west of the intersection of freeways I-10 and I-405 and some area west of I-405? Might a district-wide TDM organization organize and promote actions? Could they even incorporate sharing some transportation facilities and services available on and for the UCLA campus? Further campus development of transportation facilities for such purposes might be reasonable, and funding for them might not necessarily have to come all from the campus budget. We suggest that UCLA act to promote a strong district-wide TDM organization.

Finally, if an assessment district for transportation improvements is not already fully developed and active, we recommend that UCLA take a lead in pressing for its formation and for its active decision-making.

If you have any questions regarding these comments, please refer to IGR/CEQA Number 021212/EK and contact me at (213) 897 - 4429 .

Sincerely,



STEPHEN J. BUSWELL
IGR/CEQA Program Manager
Office of Regional Transportation Planning

cc: Becky Frank, State Clearinghouse

Response to Comment Letter 5

Letter from California Department of Transportation, District 7 Regional Planning, dated December 5, 2002

Response to Comment 5-1

The comment suggests that the campus begin to investigate potential mitigation strategies that might be implemented in the "next planning cycle," which does not address the current 2002 LRDP update. UCLA remains interested in pursuing cost-effective methods to reduce parking demand and trip generation. Inclusion of PP 4.13-1(d) in the 2002 LRDP Draft EIR (Volume 1, page 4.13-94) committed the campus to meet the AVR and trip reduction requirements established by the SCAQMD throughout the planning horizon of the 2002 LRDP. Although the current elements of the TDM program were described in the 2002 LRDP Draft EIR, PP 4.13-1(d) acknowledged that the elements of the program are subject to modification as new technologies are developed or alternative program elements are found to be more effective.

Response to Comment 5-2

The University acknowledges that the UCLA campus is located in a congested urban area. Refer to the 2002 LRDP Draft EIR (Volume 1, Section 4.13 [Transportation/Traffic]) for a discussion of existing and projected traffic conditions. The campus has for many years participated in discussions related to transportation improvements with local, regional, and State agencies, and will continue to do so in the future in order to seek solutions that reduce campus-related vehicle trips and associated impacts.

Response to Comment 5-3

This comment is acknowledged. Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of student enrollment, including the potential to accommodate growth at other University of California campuses.

Response to Comment 5-4

Although the campus would be a willing participant in the development of strategies that build support for transportation improvements, the University does not have statutory authority and/or responsibility for developing or implementing transportation system improvements.

Response to Comment 5-5

As noted in Table 4.13-1 (Study Intersections and Existing Traffic Conditions) of the 2002 LRDP Draft EIR (Volume 1, pages 4.13-9 to 4.13-12), existing traffic conditions in the project study area already reflect congested conditions at many intersections. As shown in Table 4.13-31 (Cumulative Change in Traffic Conditions from Regional Growth and Related Projects—Regular Session) (Volume 1, pages

4.13-99 to 4.13-103), Future traffic conditions are projected to be more congested than current conditions, even without implementation of the 2002 LRDP. Thus, little opportunity exists for traffic to be diverted from the freeway system onto local streets and arterials.

The comment does not identify any specific intersection or road segment that should be considered for street widening. As noted in the discussion of the potential to mitigate significant impacts at various intersections, the community has expressed general opposition to street widening, and there appears to be little potential to expand existing roadways to improve the capacity of individual intersections (because existing right-of-ways are already fully improved, and widening may result in the loss of landscaping, including specimen trees, and could increase noise, air pollution, and light and glare impacts on adjacent uses). Limited potential also exists to add through lanes to existing roadways within the study area for many of the same reasons noted above. Further, street widening is the responsibility of the Los Angeles Department of Transportation, not the University. It should be noted that a proposal by the City of Los Angeles to add a reversible lane to Sepulveda Boulevard is anticipated to be completed within the planning horizon of the 2002 LRDP (and that improvement was assumed to be completed in the traffic analysis in the 2002 LRDP Draft EIR).

Response to Comment 5-6

Caltrans, SCAG, the Metropolitan Transportation Authority, the South Coast Air Quality Management District, the County of Los Angeles, and the Cities of Beverly Hills, Culver City, Los Angeles, and Santa Monica all have varying responsibilities for implementing measures to improve traffic conditions and promote alternative transportation modes in the area surrounding the UCLA campus. The establishment of a sub-regional authority for TDM measures might improve coordination of TDM measures and possibly provide opportunities for shared funding of a TDM program. Although the University would be a willing participant in discussions regarding the feasibility or establishment of such an entity, as noted above in Response to Comment 5-4, those agencies with statutory authority and/or responsibility for transportation systems and public roadways should take the lead in the development of such strategies.

It should be noted that since the inception of the UCLA vanpool network, employees of businesses in Westwood have been eligible to participate in UCLA vanpools. To the extent that further expansion of such programs is feasible, the University will continue to encourage programs that expand participation in alternative transportation strategies in the local area.

Response to Comment 5-7

UCLA has no authority to establish an assessment district, and the City of Los Angeles has limited authority to establish an assessment district for transportation improvements because the establishment of

assessment districts is subject to the voter approval requirements established by Proposition 218. However, the City of Los Angeles has in the past developed interim control ordinances that provide for the collection of developer fees for transportation improvements from subsequently approved development projects. The University has contributed to such programs in the past and would participate in such programs in the future to provide the University's fair share to planned transportation programs, subject to the conditions described in the 2002 LRDP Draft EIR (Volume 1, page 4.13-50, paragraph 1).

Response to Comment 5-8

This comment is acknowledged.

CITY OF LOS ANGELES

CALIFORNIA

Comment Letter 6
DEPARTMENT OF
TRANSPORTATION221 N. FIGUEROA ST., SUITE 500
LOS ANGELES, CA 90012
(213) 580-1177
FAX (213) 580-1188WAYNE K. TANDA
GENERAL MANAGERJAMES K. HAHN
MAYOR

December 20, 2002

DOT Case No. WLA 02-089

Tova Lelah, Assistant Director
UCLA Capital Programs
1060 Veteran Avenue
Los Angeles, CA 90095-1365**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE UCLA
LONG RANGE DEVELOPMENT PLAN**

The Los Angeles Department of Transportation (DOT) has reviewed Chapter 4.13 and Appendix 4 of the Draft Environmental Impact Report (DEIR) for the proposed UCLA Long Range Development Plan (LRDP). This project proposes an increased enrollment of 4,000 full-time-equivalent (FTE) students through 2010. DOT's review of the DEIR indicates that the following comments need to be addressed:

1. There are discrepancies in page 2-32 of volume 1 and part of page 4.13-76, mitigation measure *MM 4.13-2(p)* for Beverly Glen Boulevard and Greendale Avenue (Intersection 58). The proposed measure was described as the implementation of dedicated northbound and southbound right turn lanes whereas in another part of Chapter 4.13 (p. 4.13-76) and Appendix 4 (p.128), the proposed measure was described as the implementation of southbound left-turn and through lanes. DOT would approve the proposed implementation of southbound left-turn and through lanes on Greendale Avenue at Beverly Glen Boulevard.
2. On page 4.13-69, intersection no. 14, Montana Avenue and Levering Avenue, it should be noted that stop signs currently control the northbound and southbound approaches on Levering Avenue at Montana Avenue.
3. As noted in Chapter 4.13 (p. 4.13-77), (see Attachment A), the benefit of the proposed Adaptive Traffic Control System (ATCS) at the twelve intersections listed below, which are part of a larger 51-intersection ATCS Westwood subsystem, may not materialize until such time when the funding of the entire ATCS subsystem is obtained and enables the City to construct the system. It is DOT's policy to require full funding of the entire system in order for the mitigation measures to be accepted. DOT has estimated that the Westwood ATCS subsystem will cost approximately \$1,020,000:

- i) Montana Avenue & Sepulveda Boulevard,
- ii) Strathmore Place & Gayley Avenue,
- iii) Weyburn Avenue & Gayley Avenue,
- iv) Kinross Avenue & Westwood Boulevard,
- v) Wilshire Boulevard & San Vicente Boulevard,
- vi) Wilshire Boulevard & Gayley Avenue,
- vii) Wilshire Boulevard & Beverly Glen Boulevard,
- viii) Ohio Avenue & Sepulveda Boulevard,
- ix) Ohio Avenue & Veteran Avenue,
- x) Santa Monica Boulevard (N) & Veteran Avenue,
- xi) Santa Monica Boulevard (N) & Westwood Boulevard, and
- xii) Beverly Glen Boulevard & Greendale Drive

The following operational and safety improvements are also recommended by DOT:

1. Montana Avenue/Gayley Avenue and Veteran Avenue (I/S No. 15)

Restripe the north and south legs of Veteran Avenue to provide for north and southbound left-turn channelization. Install protected/permissive left-turn phasing for the southbound direction on Veteran Avenue. Modify and relocate traffic signals, striping, signs, catch basins, utilities, etc. as necessary.

2. Wilshire Boulevard and Beverly Glen Boulevard (I/S No. 43)

Widen the east side of Beverly Glen Boulevard between Wilshire Boulevard and Ashton Avenue by 10 feet to provide an exclusive right-turn pocket approximately 200 feet long. Install protected/permissive left-turn phasing for the southbound direction on Beverly Glen Boulevard. Modify and relocate traffic signals, striping, signs, catch basins, utilities, etc. as necessary.

The above two improvements should be done under the City of Los Angeles B-Permit process. UCLA should establish a time table for implementing these two improvements as well as the ATCS funding.

Further, in connection with this update of the 1990 LRDP, (the "2002 LRDP"), DOT notes that the Traffic Mitigation Monitoring Agreement (TMMA), which was signed in 1992 between the City of Los Angeles and UCLA, is due to expire on June 30, 2005. DOT recommends that the TMMA be renewed and extended through the life of the 2002 LRDP.

6-4

6-5

6-6

6-7

6-8

6-9

Tova Lelah

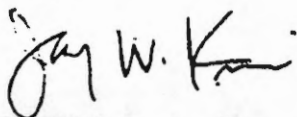
-3-

December 20, 2002

If you have any questions, you may contact me or Esther Tam of my staff at (213) 485-1062.

6-10

Sincerely,



JAY W KIM, Senior Transportation Engineer
Los Angeles Department of Transportation
WLA/Valley Programs Division

C:\Documents and Settings\User\Desktop\wcla_ldp.wpd

Attachment

- c: Renee Schillaci, Fifth Council District
Mo Blorfroshan, Verej Janoyan, Tim Conger, DOT
Glenn Ogura, Allyn Rifkin, Esther Tam, DOT
George Rhyner, Crain & Associates

In addition, restriping has been identified at the following intersection

40. Wilshire Boulevard and Malcolm Avenue (P.M. peak)

With installation of ATCS at 12 intersections and the proposed restriping at one additional intersection, the impact of implementation of the 2002 LRDP during the summer session would be mitigated to a less-than-significant level at all 13 intersections.

No feasible mitigation measures are available at the following 12 intersections:

1. Church Lane/Ovada Place and Sepulveda Boulevard (P.M. peak)
3. Sunset Boulevard and Church Lane (P.M. peak)
5. Sunset Boulevard and Veteran Avenue (A.M. and P.M. peak)
6. Sunset Boulevard and Bellagio Way (A.M. and P.M. peak)
9. Sunset Boulevard and Hilgard Avenue/Copa De Oro Road (A.M. and P.M. peak)
10. Sunset Boulevard and Beverly Glen Boulevard/Bel Air Road (A.M. and P.M. peak)
11. Sunset Boulevard (East I/S) and Beverly Glen Boulevard (A.M. and P.M. peak)
14. Montana Avenue and Levering Avenue (A.M. and P.M. peak)
15. Montana Avenue/Gayley Avenue and Veteran Avenue (A.M. and P.M. peak)
36. Wilshire Boulevard and Veteran Avenue (A.M. and P.M. peak)
37. Wilshire Boulevard and Gayley Avenue (P.M. peak)
57. Beverly Glen Boulevard and Mulholland Drive (A.M. peak)

Therefore, the impact of implementation of the 2002 LRDP during the summer session would remain significant and unavoidable at 12 intersections (during the peak hours noted above).

- As noted above under Impact 4.13-1, the Los Angeles Department of Transportation has indicated a preference for installation of ATCS at 51 intersections in the Westwood area. Because installation of ATCS is proposed as mitigation for the 2002 LRDP at 13 intersections (including six locations which are not on the list of 51 intersections identified by LADOT), the City of Los Angeles may not be willing to upgrade only 12 intersections, and instead defer the upgrade until such time as the City can fund a comprehensive installation of ATCS in the Westwood area. Because installation of the ATCS is beyond the jurisdiction of The Regents to implement, ATCS may not be available to mitigate the impacts of implementation of the 2002 LRDP during the summer session at those intersections.

As an alternative to ATCS, physical improvements have been identified at two intersections:

46. Ohio Avenue and Veteran Avenue
58. Beverly Glen Boulevard and Greendale Drive

Response to Comment Letter 6

Letter from Los Angeles Department of Transportation, dated December 20, 2002

Response to Comment 6-1

This comment contains introductory information, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. Therefore, no response is required.

Response to Comment 6-2

The comment indicates that LADOT “would approve the proposed implementation of southbound and left-turn and through lanes on Greendale Avenue at Beverly Glen Boulevard.” Since there are no through lanes on Greendale Avenue (it ends at Beverly Glen Boulevard), it appears the comment intended to suggest improvements on Beverly Glen Boulevard, at the intersection of Greendale Avenue.

This comment correctly notes that the 2002 LRDP Draft EIR erroneously identified the proposed mitigation measure at Beverly Glen Boulevard and Greendale Drive as restriping to provide both northbound and southbound left turn lanes. MM 4.13-2 in the 2002 LRDP Draft EIR (Volume 1, page 4.13-76) is therefore revised as follows:

MM 4.13-2(p) If the City of Los Angeles elects not to install ATCS at the intersection of Beverly Glen Boulevard and Greendale Drive, the campus shall provide fair share funding for restriping the west side of Beverly Glen Boulevard by the City of Los Angeles to provide dedicated northbound and southbound through and left/right-turn lanes.

Response to Comment 6-3

The comment correctly notes that the 2002 LRDP Draft EIR erroneously identified the intersection of Montana Avenue and Levering Avenue as STOP sign controlled for all approaches. The discussion of this intersection in the 2002 LRDP Draft EIR (Volume 1, page 4.13-69) is revised as follows:

Intersection No. 14—Montana Avenue and Levering Avenue

This intersection is currently STOP sign controlled for the southbound and northbound approaches. Refer to the discussion under Impact 4.13-1, above, for a discussion of potential mitigation options at this intersection. No feasible mitigation measures have been identified for this intersection.

Response to Comment 6-4

This comment, which indicates that installation of ATCS may not proceed until funding has been obtained for the entire 51 intersections, is acknowledged. There is no nexus between the twelve intersections that would be impacted by implementation of the 2002 LRDP (for which ATCS installation was proposed as mitigation) and the requested additional 38 locations, none of which would be significantly impacted by implementation of the 2002 LRDP. The University will pay its “fair share” (as

explained in the 2002 LRDP Draft EIR [Volume 1, page 4.13-50, paragraph 1]) proportional funding for the impacted locations in order to ensure that project impacts at those intersections are mitigated.

In the event that the City does not approve the installation of ATCS at the identified intersections, those impacts could remain significant and unavoidable. As noted in the 2002 LRDP Draft EIR under the discussion of Impact LRDP 4.13-1 (Volume 1, page 4.13-57):

...because the City of Los Angeles may not elect to proceed with installation of ATCS at a single intersection, ATCS measure may not be available to mitigate the impact of LRDP implementation. No other feasible mitigation measures have been identified at this intersection; therefore, the impact of LRDP implementation during the regular session at Montana Avenue/Gayley Avenue and Veteran Avenue could also remain significant and unavoidable.

In addition, for Impact LRDP 4.13-2 (Volume 1, page 4.13-77) the 2002 LRDP Draft EIR noted:

...the Los Angeles Department of Transportation has indicated a preference for installation of ATCS at 51 intersections in the Westwood area. Because installation of ATCS is proposed as mitigation for the 2002 LRDP at 13 intersections (including six locations which are not on the list of 51 intersections identified by LADOT), the City of Los Angeles may not be willing to upgrade only 12 intersections, and instead defer the upgrade until such time as the City can fund a comprehensive installation of ATCS in the Westwood area. Because installation of the ATCS is beyond the jurisdiction of The Regents to implement, ATCS may not be available to mitigate the impacts of implementation of the 2002 LRDP during the summer session at those intersections.

The identification of 13 intersections in the 2002 LRDP Draft EIR (cited above) as locations at which ATCS could mitigate significant impacts during the twelve-week summer session was in error. Only 12 intersections were identified for ATCS installation in the 2002 LRDP Draft EIR. Therefore, the text in the 2002 LRDP Draft EIR (Volume 1, page 4.13-77) is revised as follows:

...the Los Angeles Department of Transportation has indicated a preference for installation of ATCS at 51 intersections in the Westwood area. Because installation of ATCS is proposed as mitigation for the 2002 LRDP at ~~13~~12 intersections (including six locations which are not on the list of 51 intersections identified by LADOT), the City of Los Angeles may not be willing to upgrade only 12 intersections, and instead defer the upgrade until such time as the City can fund a comprehensive installation of ATCS in the Westwood area. Because installation of the ATCS is beyond the jurisdiction of The Regents to implement, ATCS may not be available to mitigate the impacts of implementation of the 2002 LRDP during the summer session at those intersections.

As an alternative to ATCS, physical improvements were proposed at two of the thirteen intersections. Restriping was also proposed at one additional intersection. However, because the proposed restriping would result in the loss of on-street parking, the City of Los Angeles may not elect to implement the proposed improvements. Thus, with respect to summer impacts, the 2002 LRDP Draft EIR (Volume 1, pages 4.13-78) concluded:

Because installation of ATCS and other physical improvement are beyond the jurisdiction of The Regents to implement, even with continued maintenance of the vehicle trip and parking space caps, development of on-campus housing, and continued implementation of the campus TDM program, the impacts of the LRDP implementation during summer session could remain significant and unavoidable

at all 25 intersections during the summer session, when traffic volumes (prior to mitigation) are approximately 3.7 percent lower than during the regular session...

Although the 2002 LRDP Draft EIR did identify ATCS as mitigation, it acknowledged that if ATCS were not implemented at one or more intersections, impacts could remain significant and unavoidable at those intersections.

Response to Comment 6-5

This comment is acknowledged. See Responses to Comments 6-6 and 6-7.

Response to Comment 6-6

As noted in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-77 to 4.13-78), previously-identified improvements to the intersection of Montana Avenue/Gayley Avenue and Veteran Avenue have been discussed and deemed infeasible, as such improvements would result in the loss of mature landscaping and the removal of unrestricted on-street parking, which is very limited adjacent to the campus.

The alternative mitigation measure suggested by LADOT would involve restriping the intersection to provide a dedicated left turn lane for southbound traffic on Veteran and signal modifications to provide permissive left-turn phasing (e.g., a green arrow). Restriping of the roadway would result in the loss of on-street parking. In addition, the existing traffic signal would have to be replaced to permit the permissive left-turn phasing. Replacement of the traffic signal could require relocation of utilities or other physical modifications, which would result in the short-term loss of landscaping at this intersection. Because of general and historic community opposition to the removal and/or loss of landscaping at this location, the University considers this measure infeasible.

In addition, the suggested mitigation measure would mitigate regular session impacts only. Even with this suggested measure, installation of ATCS would still be required to mitigate impacts during the summer session. As LADOT has indicated that ATCS "...may not materialize until such time as funding of the entire ATCS system is obtained..." the alternative measure suggested by LADOT would not fully mitigate project-related impacts.

Response to Comment 6-7

With respect to the potential for modification of the intersection of Wilshire Boulevard and Beverly Glen Boulevard, the 2002 LRDP Draft EIR noted (Volume 1, page 4.13-73):

Physical modification of the intersection to improve capacity could also mitigate potential impacts; however, this intersection is fully improved within the existing right-of-way, and, therefore, restriping is not possible. Widening would also require acquisition of additional land (by the City of Los Angeles), which would result in the loss of landscaping. This could result in increased noise, air quality, and light and glare impacts on adjacent land uses and is, therefore, considered infeasible...

The improvement suggested by LADOT for this intersection would involve widening Beverly Glen Boulevard (by 10 feet for a length of 200 feet north of Wilshire), which was identified as infeasible in the 2002 LRDP Draft EIR as noted above.

Response to Comment 6-8

As noted above in Responses to Comments 6-7 and 6-8, the University considers these two measures infeasible.

Response to Comment 6-9

The Traffic Mitigation Monitoring Agreement with the City of Los Angeles remains in effect until 2005, at which time the University will discuss the potential for extension of the agreement with the City of Los Angeles as appropriate. The 2002 LRDP Draft EIR included the following program, practice, and procedure:

PP 4.13-1(a) The campus shall continue to maintain the 1990 LRDP vehicle trip cap of 139,500 average daily trips.

In order to demonstrate that the trip cap is being adhered to, the University will continue to monitor compliance with the trip cap throughout the planning horizon of the 2002 LRDP. To provide a comparative basis with recent and historical counts, future cordon counts would be conducted in a manner consistent with the previous counts and the results of future counts will continue to be transmitted directly to LADOT and be made otherwise available on request.

Response to Comment 6-10

This comment is acknowledged.

FRIENDS OF WESTWOOD

10558 KINNARD AVENUE
LOS ANGELES, CA 90024

TEL 310-470-4522
FAX 310-470-9944
EMAIL: LAURA_LAKE@EMAIL.COM

November 20, 2002

VIA FAX 310-206-1510

Tovah Lelah
UCLA Capital Programs

RE: UCLA LRDP DEIR COMMENTS

Dear Tovah:

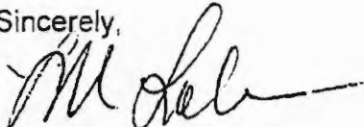
Friends of Westwood wishes to go on record in support of Westwood Hills Property Owners Association and UCLA Watch and incorporate by reference their comments as well as all other comments submitted.

Of particular concern is the fate of the 1990 LRDP Trip Cap. A new LRDP should extend that cap, and also commit to publishing the results of the annual counts in a timely fashion.

Likewise, the increase in enrollment is not backed up in terms of alternatives available to the Regents. Surely the environmentally superior alternative would be to allocate enrollment increases based on the ability of each campus to accept them without adverse impacts.

Finally, Friends of Westwood requests a more detailed analysis of seismic hazards on campus due to the Santa Monica-Raymond, Newport-Inglewood, and Overland Avenue Fault Zones. Do these run through campus, and if not, how close are they to campus? ***The map provided does not provide enough detail to understand which of these fault zones are on campus as opposed to within 10 miles.*** Please provide a detailed campus map with fault zone information. Also included in this analysis should be a detailed plan for disaster relief for the new hospital and trauma services for the region.

Sincerely,



Laura Lake, Ph.D.
President

cc: Carole Magnuson
Alvin Milder

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Response to Comment Letter 7

Letter from Friends of Westwood (Laura Lake), dated November 20, 2002

Response to Comment 7-1

The comment is acknowledged. Refer to the responses to comments for Letter 9 (Westwood Hills Property Owners Association), as well as Comment Letters 10, 11, 11a, and 12 (UCLA Watch) for discussions regarding the environmental issues raised by those commenters.

Response to Comment 7-2

The 2002 LRDP Draft EIR included the following program, practice, and procedure:

PP 4.13-1(a) The campus shall continue to maintain the 1990 LRDP vehicle trip cap of 139,500 average daily trips.

In order to demonstrate that the trip cap is being adhered to, the University will continue to monitor compliance with the trip cap throughout the planning horizon of the 2002 LRDP. To provide a comparative basis with recent and historical counts, future cordon counts would be conducted in a manner consistent with the previous counts and the results of future counts will continue to be transmitted directly to LADOT and be made otherwise available on request.

Response to Comment 7-3

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of enrollment growth at UCLA and throughout the University of California system. In addition, refer to Chapter 6 (Alternatives) of the 2002 LRDP Draft EIR for a discussion of project alternatives, including an evaluation of the environmental impacts that would result from implementation of each of the alternatives.

Response to Comment 7-4

No known faults are present on the UCLA campus. Figure 4.5-2 (Regional Fault Map) (Volume 1, page 4.5-5), was provided to show the geographical relation of the campus to regional fault systems. Table 4.5-1 (Estimated Maximum Earthquake Magnitudes [Mw] for Major Faults within 20 Miles of the Campus) (Volume 1, pages 4.5-6 to 4.5-7) lists the faults within 20 miles for which magnitudes of earthquakes could exceed 6.0. However, as stated on page 4.5-13 of Volume 1, "no known active or potentially active earthquake faults traverse the campus." No Alquist-Priolo Fault Zones have been identified on the campus: as described on page 4.5-7 of Volume 1, "no faults have been identified that would result in a surface rupture on the campus." In addition, further consultation with Geotechnologies, Inc., the geotechnical consultant that prepared the studies for the NHIP and a firm

with extensive experience on the UCLA campus, has confirmed that no known faults are present on the campus. However, as described in the 2002 LRDP Draft EIR (Volume 1, pages 4.5-14 to 4.5-15), PP 4.5-1(a) requires the preparation of a site-specific geotechnical study for every project proposed under the 2002 LRDP. As stated on pages 4.5-13 to 4.5-14 of Volume 1, "if evidence of an active or potentially active fault is discovered during preparation of a site-specific geotechnical report, as required by PP 4.5-1(a), the report shall address the potential hazards and provide design recommendations that shall be incorporated into the project."

As described in the 2002 LRDP Draft EIR (Volume 1, page 4.6-35):

UCLA implements a Campus Emergency Response Plan that is disseminated campuswide and outlines procedures for all campus staff, students, and visitors to follow in case of emergency. In addition, the campus has a Disaster Response Manual, which provides instructions and procedures for employees of Facilities Management and EH&S to follow in the event of an emergency. UCLA has also developed a Disaster Initial Response Plan and Hazardous Materials Response Plan that cover a broad range of emergency situations related to both human-made disasters ... and natural disasters, such as earthquakes. Multiple evacuation areas for major emergencies or disasters are also provided in each campus zone. In addition, both the City and County of Los Angeles have Emergency Contingency Plans that address emergency situations that could occur on the UCLA campus.

The Campus Emergency Response Manual is available on the EHS website at the following location: http://www.ehs.ucla.edu/admin/emerg_info.html. Impact 4.6-8, on page 4.6-35 to 4.6-36 of the 2002 LRDP Draft EIR, determined that although construction activities could potentially affect emergency response or evaluation plans due to temporary construction barricades or other obstructions, following campus programs, practices, and procedures regarding emergency access would ensure that impacts associated with emergency access or response would remain less than significant.

Note also that the potential impacts associated with construction and operation of the new medical center were previously evaluated in the Academic Health Center Facilities Reconstruction Plan Final EIR (SCH No. 1997061016). The replacement medical center is currently under construction, and is being constructed—and would be operated—in compliance with all applicable laws and regulations pertaining to the construction and operation of hospital facilities, including emergency access requirements. Further, the University believes that the provision of a new medical center capable of providing trauma services constitutes a beneficial impact to the medical services, including trauma facilities, available within the greater Los Angeles area.

THE HOLMBY - WESTWOOD PROPERTY OWNERS ASSN., INC.

November 20, 2002

Tovah Lelah
UCLA Capital Programs, 1060 Veteran Avenue, Los Angeles, CA 90095-1365
Public Hearing UCLA Campus
November 20, 2002

Re: Comments on UCLA LRDP and Northwest Housing Infill Project DEIR, SCN 2002031115.

Holmby-Westwood Property Owners Association goes on record in support of the comments submitted by Westwood Hills Property Owners Association, Westwood Homeowners Association, UCLA Watch, Friends of Westwood, and incorporates by reference their comments as well as all other comments submitted in connection with this public hearing and as of close of written comments on Dec. 16, 2002. We object to the scheduling of this public hearing at mid point in the public comment period and reserve our right to further comment.

H-WPOA is handicapped, as are other concerned parties, in addressing the appropriateness of the level of planned student growth the consequential environmental impacts, and proposed changes to the 1990 UCLA LRDP, since no underlying demographic data is provided to validate or justify, in particular, the proposed UCLA student increase. Neither can it be determined how the projected student enrollment growth figure for UCLA was determined and with what supporting data. For these reasons, among others, the DEIR violates CEQA (California Environmental Quality Act) because it is incomplete and deficient. Further, the legal defects of the DEIR deprives impacted parties of their due process rights to appropriate mitigation in that it cannot be determined from data provided in the DEIR:

- That projected UCLA student growth cannot be better accommodated at other campuses in the UC statewide system, given the significance of unmitigated environmental impacts identified in the DEIR.

During peak travel hours, the main traffic arteries in communities adjacent to UCLA such as Sunset, Hilgard, Veteran and Wilshire are at or near at gridlock status as the consequence of existing UCLA student capacity..

- That given the State of California \$21 billion budget deficit and the significant unmitigatable environmental impacts identified in the DEIR, that the unbuilt UCLA capacity from the 1990 LRDP should not be diverted to other UC campuses with less unmitigateable environmental impacts.

The DEIR fails to identify the built out capacity of UCLA campus, and the requirement to establish such a cap, given the unmitigatable environmental impacts identified in the DEIR. The DEIR fails to commit to continue the requirement for a tree for a tree replacement program in connection with new construction. The DEIR fails to commit to a continuation of, and establishment of a verifiable audit program for the existing Los Angeles Transportation Mitigation Monitoring Agreement.

- That an on-campus bus terminal cannot be built to accommodated the existing and/or expanded Bruin Go program.

The Bruin Go program was developed without any EIR and the existing campus bus terminal at Hilgard and Strathmore, established in 1938 or earlier, constitutes a significant environmental impact due to the high level of buses terminating in a residential zone and this environmental impact is not addressed in the DEIR.

- That free on campus handicapped parking cannot be established, after changes in student enrollment policy identifies the number of handicapped students and employees in need of on campus handicapped parking.

The failure of UCLA to provide adequate on site parking in general, and in particular for handicapped students has created environmentally significant impacts on residential streets east of campus in the Holmby-Westwood community which are not addressed in the DEIR.

These identified environmentally significant legal defects can be addressed in a revised and recirculated DEIR that is needed in order to avoid a legal challenge to the DEIR. We herewith request a revised and recirculated DEIR to address the issues raised in this letter and other letters and comments submitted at this public hearing.

Yours truly, *Sandy Brown per*

Sandy Brown, President, Holmby-Westwood Property Owners Association

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Response to Comment Letter 8

Letter from HWPOA (Sandy Brown), dated November 20, 2002

Response to Comment 8-1

This comment is acknowledged. Refer to the responses to Letter 7 (Friends of Westwood); Letter 9 (Westwood Hills Property Owners Association); Letters 10, 11, 11a, and 12 (UCLA Watch); as well as to the responses to the comments submitted by representatives of these groups at the November 20, 2002, public hearing (Letter T), for discussion regarding the environmental issues raised therein. Refer also to the responses to comments submitted by other parties (Letters 1 to 373, as well as Letter T) for discussion of other environmental issues raised during the public participation process. Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the 2002 LRDP Draft EIR public review period and the opportunities provided for public comment on the 2002 LRDP Draft EIR.

Response to Comment 8-2

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of the University of California's efforts to plan for increased enrollment throughout the University of California system, and the proposed allocation of enrollment growth among the various campuses that comprise the University of California system, including UCLA. Refer also to Impact LRDP 4.10-1 in the 2002 LRDP Draft EIR (Volume 1, pages 4.10-9 to 4.10-13) for a specific discussion of population growth at UCLA. The 2002 LRDP Draft EIR was prepared in full accordance with all substantive and procedural requirements for a legally adequate EIR, including, but not limited to, the requirements set forth in CEQA and the *CEQA Guidelines*.

Response to Comment 8-3

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of the University of California's efforts to plan for increased enrollment throughout the University of California system, and the proposed allocation of enrollment growth among the various campuses that comprise the University of California system, including UCLA.

Response to Comment 8-4

This comment is acknowledged. Refer to of the 2002 LRDP Draft EIR (Volume 1, Section 4.13 [Transportation/Traffic]) for a complete discussion of existing conditions on roadways and traffic arterials.

Response to Comment 8-5

The University agrees with the comment that the unbuilt capacity at UCLA, which is 1.7 million gross square feet previously approved under the 1990 LRDP, should not be diverted to other campuses. Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of enrollment growth at UCLA and throughout the University of California system. The 2002 LRDP and the 2002 LRDP Draft EIR are not meant to reflect or pre-judge the final development of the UCLA campus. Rather, the 2002 LRDP establishes a comprehensive land use plan to guide the physical development of the campus through 2010–11, which is the planning horizon of this LRDP. It would be speculative to discuss campus development beyond 2010–11.

Response to Comment 8-6

UCLA values its natural resources, such as mature trees, and objectives of the 2002 LRDP include development with consideration of sustainability principles, as well as preservation and enhancement of landscaping. Accordingly, the 2002 LRDP Draft EIR identifies adequate mitigation for impacts to trees resulting from on-campus development under the 2002 LRDP. Specifically, MM 4.1-2 (Volume 1, page 4.1-26) and MM 4.3-1(c) (Volume 2, page 4.3-4) (the measures are identical) provide:

MM 4.1-2 In conjunction with CEQA documentation required for each project proposal under the 2002 LRDP, a tree replacement plan shall be prepared and implemented. The tree replacement plan for each project shall determine the appropriate number of replacement trees in relation to the specific project site characteristics. The tree replacement plan would ensure that the appropriate number of new trees is planted within the available site area so that each tree planted has sufficient space to grow and thrive. (This is identical to Biological Resources MM 4.3-1(c).)

Because the 2002 LRDP is a program-level document, CEQA does not require preparation of a tree replacement plan for projects that are unknown at this stage of the environmental review process. Rather, it is sufficient under CEQA for the University to commit to the preparation of a detailed tree replacement plan in the context of CEQA review for specific projects. See also *CEQA Guidelines* Section 15126.4(a)(2) (In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design) and *Rio Vista Farm Bureau v. County of Solano*, 5 Cal.App.4th 351 (1992) (for mitigation measures that cannot be specifically formulated without a proposal for a specific facility, a commitment for future mitigation is sufficient).

Under 1990 LRDP EIR Mitigation Measure D-1.1, the tree replacement plan did not require a one-for-one replacement ratio, and the same is true for proposed MM 4.3-1(c). Although, in some cases, one-for-one replacement may be possible or even exceeded, the campus tree replacement program provides a necessary measure of flexibility for an urban campus with limited space and to allow for optimum tree

health. In some areas, a one-to-one replacement ratio may not be appropriate due to other tree growth limiting factors, such as pavement (including sidewalks), underground utilities, and buildings, or where excess tree growth could result in safety or security concerns. Proper planning for optimum tree health includes ensuring enough space for root, branch, and trunk growth.

In addition to planting replacement trees, the campus has, where possible, relocated mature trees that would otherwise have been removed. In the case of the NHIP, the campus proposes to relocate 20 mature trees in the vicinity of the proposed housing and five mature trees in front of the proposed Dykstra Parking Structure, as discussed in the 2002 LRDP Draft EIR (Volume 2, page 4.3-12).

Response to Comment 8-7

The 2002 LRDP Draft EIR included the following program, practice, and procedure:

PP 4.13-1(a) The campus shall continue to maintain the 1990 LRDP vehicle trip cap of 139,500 average daily trips.

In order to demonstrate that the trip cap is being adhered to, the University will continue to monitor compliance with the trip cap throughout the planning horizon of the 2002 LRDP. To provide a comparative basis with recent and historical counts, future cordon counts would be conducted in a manner consistent with the previous counts and the results of future counts will continue to be transmitted directly to LADOT and be made otherwise available on request.

Response to Comment 8-8

Refer to Topical Response A (BruinGo) for a discussion of the continuation of the BruinGo program, and Topical Response B (Hilgard Bus Terminal) for a discussion of the existing operation of the Hilgard Bus Terminal. Further, the 2002 LRDP Draft EIR indicated that implementation of the 2002 LRDP would decrease the number of transit riders compared to existing conditions due to increased student housing. Therefore, the 2002 LRDP would not necessitate an increase in bus service to the campus.

Response to Comment 8-9

Under the authority of Section 67301 of the California Education Code, the University of California charges disabled students, staff, and faculty for parking. All current UCLA disabled students, staff, and faculty are able to purchase a parking permit upon request. The Education Code also provides for parking at no charge to disabled University of California visitors.

To differentiate UCLA students, staff, and faculty from visitors, campus parking regulations require that a valid parking permit be displayed along with a valid disabled person's placard or license plate even when parking in campus stalls that are not reserved for disabled persons. This policy supports the

campus's ongoing efforts to protect parking availability for the disabled community and discourages drivers from parking on campus improperly.

Campus Parking Services monitors demand and utilization of all parking spaces, including marked stalls that are reserved for disabled persons and increases the supply of such spaces in individual lots as demand dictates. To the extent that implementation of the 2002 LRDP results in an increase in disabled faculty, staff, students, or visitors, the campus will adjust the supply of parking accordingly.

Response to Comment 8-10

As noted in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-88 to 4.13-92), implementation of the 2002 LRDP would not result in inadequate parking capacity. Since implementation of the TDM program, the supply of parking has been maintained so as to balance supply with the need to encourage the use of alternative transportation modes.

The 2002 LRDP Draft EIR indicated that even with the increase in regular session enrollment, the availability of parking permits for commuter students would increase slightly, from the current 0.283 permits per other commuter student (as shown in Table 4.13-8 [Current Parking Allocation Ratios], Volume 1, page 4.13-22) to 0.293 permits per in the future (as shown in Table 4.13-21 [Future Parking Ratios with 2002 LRDP], Volume 1, page 4.13-38). Thus parking availability for commuter students will improve slightly as a result of the 2002 LRDP. Further, the concurrently proposed NHIP would increase the number of on-campus resident students by approximately 1,675 persons. The net effect of the 2002 LRDP would be a slight decline of "other commuter students" (those students that do not live on campus and are not academic student employees, such as teaching assistants). As shown in Table 4.13-6 (Current Parking Allocation—Regular Session [Fall 2001]) (Volume 1, page 4.13-21) and Table 4.13-20 (Future On-Campus Parking Allocation with 2002 LRDP—Regular Session) (Volume 1, page 4.13-38), the number of other commuter students is anticipated to decline from 22,971 to 21,866 students. Therefore, implementation of the 2002 LRDP would not result in an increase in demand for off-campus parking, and no analysis of the impacts associated with the demand for such parking was required.

It should be noted that most on-street parking in the vicinity of the campus, including on residential streets east of campus, is controlled either by residential parking permits, time limits, or parking meters and enforceable through fines, which makes those spaces of limited utility to most commuter students. Thus, limited potential exists for students to seek parking in the areas surrounding the campus without violating these restrictions and incurring applicable penalties.

As noted in Response to Comment 8-9, Campus Parking Services will continue to monitor demand for disabled parking and increase the supply of such spaces in response to demand.

The potential for students, or other persons, to obtain disabled parking placards and utilize those placards to park in areas that are otherwise controlled by residential parking permits is beyond the ability of the University to control. The enforcement of parking regulations on non-University property, including the use of disabled placards, is the responsibility of law enforcement agencies, including the Los Angeles Police Department.

Response to Comment 8-11

The comment states that consideration of the EIR should be delayed until it is revised in accordance with the suggestions of the commenter and recirculated for additional public review.

Under *CEQA Guidelines* Section 15088.5, recirculation of a draft EIR is only required when significant new information is added to the EIR after public review but before certification of the Final EIR. New information added to an EIR is not "significant" for recirculation purposes unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. Under *CEQA Guidelines* Section 15088.5, "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it
- (4) The draft EIR was "so fundamentally and basically inadequate and conclusory in nature" that meaningful public review and comment were precluded

Under *CEQA Guidelines* Section 15088.5(b), recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

As the responses to comments on the 2002 LRDP Draft EIR do not contain any new significant information or changes in the project that indicate the existence of a new and significant environmental impact not previously addressed (or a feasible mitigation measure or project alternative that the University has declined to adopt), the University does not believe that any of the conditions requiring

recirculation, as set forth in 15088.5 of the *CEQA Guidelines*, have been met; therefore, recirculation is not necessary.



December 14, 2002

Tova Lelah, Assistant Director
Environmental Planning
UCLA Capital Programs
1060 Veteran Ave.
Los Angeles, CA 90095-1405

RE: UCLA Long Range Development Plan and Northwest Housing Infill Project DEIRs
SCH Number 2002031115

Dear Ms. Lelah:

The Westwood Hills Property Owners Association (WHPOA) has reviewed the 2002 LRDP and NHIP DEIRs and is pleased to have this opportunity to comment. WHPOA represents more than 600 households in the single-family neighborhood that lies directly west of campus between Veteran Avenue and the 405 Freeway, south of Sunset Blvd. and North of the Veterans Administration property. This neighborhood dates to the founding of UCLA in 1929 and, over the years, has enjoyed a positive and productive relationship with the campus. However, WHPOA is deeply concerned by the environmental impacts described in these DEIRs and finds that these documents fail to meet the requirements of CEQA for full and complete disclosure of project impacts.

The NHIP DEIR should be amended to provide project-level data about the recreation and storage components or the components should be removed from the project and subjected to separate appropriate CEQA review when sufficient project-level data becomes available.

WHPOA is troubled by the inadequate and contradictory treatment of components of the NHIP project that are sited within the area controlled by the Stipulated Agreement between the Regents and WHPOA in settlement of our prior lawsuit. The NHIP purports to provide more detailed project-level information regarding the NHIP than is available in the programmatic LRDP DEIR. (1-3, 4.0.1) In fact, the NHIP DEIR provides very little, if any, project-level detail about components proposed for the Stipulated Agreement area. This is in marked contrast to the project-level information required by CEQA and the UC CEQA guidelines. The result is that the NHIP DEIR fails to provide the level of analysis and mitigation that is required for approval of a specific project and cannot support an approval of the NHIP project by the Regents. The two components in question are the recreation facility and the 5,000 square foot storage building described in the NHIP DEIR as a "shed."

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9-1

9-2

I. The treatment of the "shed" in the NHIP DEIR demonstrates the lack of project-level information available for recreation and storage components.

The "shed" is not mentioned in 2-2 (Project Description), or in 3.3 (Project Site Area), or in 3.4 (Project Characteristics), or in the text of 3.4.2 (Project Components). Nor does it appear on Figure 3-3 (Conceptual Site Plan). Neither Volume I nor Volume II of the LRDP and NHIP DEIRs provides a description of the "shed". Webster's dictionary defines a shed as a "slight structure", a "lean-to" or "penthouse". That may or may not be what UCLA intends to build on the "bone yard". The NHIP does not provide information about what is intended.

9-3

Nor does the DEIR reveal where the shed is to be located beyond stating vaguely that it is to be located on the existing "bone yard" as far away from the fence as possible. No footprint is provided on the conceptual site plan, therefore it cannot be determined if a 5,000 square foot building or "lean to" will actually fit on the designated site behind the Veteran Avenue fence. Nor is it possible to determine how far away from the fence is meant by the description "as possible."

9-4

The DEIR does not adequately disclose the size or existing condition of the site, nor provide information about the disposition during construction of the very large amount of material that is currently stored there (to a depth of five feet or more).

The DEIR does not disclose the type of construction, the finishes, or the building height and massing, therefore it cannot be determined that aesthetic impacts are fully mitigated. The DEIR does not disclose that there currently is no landscaped buffer at that location. Section 4.1-11 errs in describing the Veteran Avenue edge as completed. The DEIR should indicate that the edge is not fully completed, e.g. no buffering other than street trees and ivy covered fence exists at the "shed" site. The NHIP DEIR should provide a minimum standard for adequate buffering behind the fence. Not only does the DEIR fail to provide mitigation along the fence but also it erroneously concludes that none is needed. The DEIR further errs in concluding that security lights will not impact residential uses across the street, since the height of the building and degree of buffering is not known nor disclosed.

9-5

The "shed" site is consistently ignored throughout the DEIR (e.g., it is not included among construction components listed in 3.4.4 or as a construction site in the Transportation section), therefore potential impacts of construction and grading on noise and air quality are not analyzed. No information is provided regarding other potential construction impacts, e.g., no information is provided about where the construction activity will be staged, how the site will be accessed or if construction and access activity will impact trees adjacent to the site. The "shed" site is not included in the tree removal plan available for other project components. This information is required by CEQA for a project-level analysis.

9-6

The DEIR does not acknowledge that the siting of the "shed" directly in proximity to residences and tennis courts violates PP 4.8-1, a planning principle and mitigation that requires projects to be sited to insure compatibility with neighboring uses. At 5,000 sq. ft., the proposed storage facility is larger than most of the homes in Westwood Hills. Calling it a "shed" does not reduce its actual impact and to the extent that "shed" implies minimum quality construction suggests that issues of compatibility exist. At a minimum, the DEIR should disclose the criteria used to determine that a 5,000 sq. ft. storage facility which will be serviced throughout the day by heavy trucks and which will require mechanical ventilation is a use that is compatible with nearby residential and recreational uses.

9-7

Further, the DEIR errs in finding in 4.8-8 that the NHIP storage facility is consistent with the Stipulated Agreement. The proposed new 5,000 sq.ft. facility is not an existing use under the terms of the Agreement and therefore violates the agreement.

9-8

II. Information regarding the proposed 15,000-sq. ft. recreation facility and outdoor recreation development does not rise to the level of specificity required for project-level analysis.

The NHIP DEIR lacks critically important siting, height and massing data that would allow the reviewer to determine that appropriate impact mitigation has been provided. The recreation project is frequently discussed in the conditional, as in trees "would most likely (be planted) around the periphery," leaving the reader to understand that biological resource and aesthetic impacts "would most likely" be mitigated. Similarly, the campus "envisions" construction of basketball and volleyball courts, which would *probably* be located on the southerly portion of the site and states that the recreation project analysis provides that it "would require some grading...and some soil import may be necessary." As further evidence of the preliminary nature of the data provided for the recreation component, the NHIP DEIR reveals that geology and soils analysis of the recreation site is based on test borings done on other building sites some distance from the recreation site. Such speculative, conceptual discussion does not meet CEQA requirements.

Chapter 4, 4.I-17 provides detailed, project-level, computerized, visual simulations of views of residential and parking components, but no comparable information is provided regarding the recreation and storage components. This is evidence that while the residential and parking components have advanced to the level of projects, the recreation and storage components are still at a programmatic, not even a schematic level, and are not appropriately included in a project-level EIR.

In 4.9-17, the NHIP DEIR does not correctly consider the impact of new special event noise impacts on areas west of campus that would result from scheduling of evening activities (see 4.9) in exterior recreation areas. Impacts of such events would differ from those in Sunset Canyon and Drake Stadium, which are shielded on the west by buildings and topography.

III. The recreation project is described in a misleading and contradictory manner in the NHIP DEIR and is not consistent with the Stipulated Agreement.

Throughout most of the two volumes of the LRDP and NHIP DEIRs, the recreation project facilities are described as consistent with the Stipulated Agreement in program and use in that they are open green areas and play courts that are intended for informal, non-spectator daytime use. The project descriptions make no mention of additional facilities. However in 4.8.8, more than halfway through NHIP DEIR, it is revealed that the development will include benches, barbecue grills, and picnic tables and (4.9): "As discussed in Chapter 3 (Project Description) of this EIR, the exterior recreation areas would primarily be limited to daytime use, **although the Housing Administration could sponsor occasional evening activities.**" The NHIP DEIR should be amended to ensure consistency with the Stipulated Agreement and to eliminate inconsistencies and contradictions in project descriptions.

IV. WHPOA requires that *organized group activities* be specifically excluded in the NHIP DEIR from allowable uses at exterior areas of the recreation facility.

The possibility that non-daytime uses could be scheduled in the recreation facility is new information and has not previously been analyzed in other sections of the NHIP DEIR. The NHIP DEIR does not discuss the nature, timing, frequency or purpose of the non-daytime uses, nor their potential impacts. Nevertheless the NHIP erroneously concludes that no significant impacts are entailed. **To the contrary, organized group activities are not consistent with the Stipulated**

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Agreement because they are not low-density, non-spectator activities. Further, they are presented as housing uses, which are specifically prohibited under the Stipulated Agreement. Therefore, the NHIP DEIR cannot conclude that the recreation project is consistent with the Stipulated Agreement.

V. The Final NHIP DEIR must provide that the administrators responsible for any project located in the Stipulated Agreement area will meet with representatives of WHPOA at four specific project stages, i. e., (1) when the project is first proposed by the University, (2) when the project advances to the schematic stage, (3) during design development and (4) before final project approval.

WHPOA finds the provision for communication and consultation with the community on campus planning issues included in the LRDP and DEIRs is too vague and speculative to be relied upon as an adequate mitigation of community and land use and planning issues raised by the Stipulated Agreement. Adequate mitigation requires a specific commitment by UCLA to meetings and consultation with representatives of WHPOA.

IV. The LRDP DEIR does not support the statement of need for the project.

The LRDP DEIR indicates that the Regents have assigned UCLA a "proportionate" share of an anticipated statewide enrollment increase, but it fails indicate the process or criteria used by The Regents to determine that "proportionate share". This is a critical omission since the UCLA LRDP DEIR relies on UCLA's need to take a "proportionate share" of new students as a grounds for rejecting alternatives to the project. Lack of this information handicaps WHPOA and other concerned parties in their efforts to evaluate the appropriateness of changes to the 1990 LRDP. Additional information should be provided. For example: Did the Regents consider alternatives to increasing enrollment at UCLA? What process did the Regents use to determine UCLA's share of the anticipated enrollment increase? What criteria were used in making this determination? Did the Regents consider the campuses' ability to mitigate negative impacts of increased population in assigning students throughout the system?

V. Errors in street and roadway designations should be corrected.

The LRDP DEIR incorrectly identifies Veteran Avenue as a Secondary Highway between Wilshire and Sunset. The Westwood Community Plan, WW-5 correctly identifies Veteran Avenue as a Secondary Highway between Wilshire and Levering. North of Levering, Veteran Avenue is a neighborhood collector street. The LRDP DEIR identifies Tiverton Avenue as a "secondary roadway." The correct designation of Tiverton Avenue is as a "secondary highway." These errors should be corrected and to the extent that they bear on impact calculations, the calculations should be revised. In addition, the LRDP DEIR should consider the closing of the Waterford on-ramp to the 405, which will occur during the planning horizon, in the traffic projections.

VI. Trip cap should be extended and monitoring mechanism described.

The new LRDP should describe its plan to monitor trips and commit to publishing the results of its annual counts in a timely manner.

VII. Tree Replacement Plan should retain 1 for 1 replacement as a minimum.

Adequate mitigation of impacts to biological resources requires more specificity than is provided by the proposed commitment to prepare a tree replacement plan for each project.

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In summary, the position of WHPOA is that the LRDP and NHIP DEIRs, among other things, contain errors and inaccurate conclusions and lack sufficient data to support project approval, and therefore must be amended and recirculated.

9-19

Very sincerely,



Carole Magnuson
President

Cc:

Sue Santon, Assistant Vice Chancellor, Capital Programs
Sam Morabito, Associate Vice Chancellor, Administration
Honorable Jack Weiss, Council Person, City of Los Angeles
Honorable Zev Yaroslavsky, Supervisor, 3rd District
Bel-Air Association
Beverly Glen Association
Brentwood Glen Homeowners Association
Casiano Homeowners Association
Holmby-Westwood Homeowners
Roscomare Valley Association
Westwood Homeowners Association

Response to Comment Letter 9

Letter from WHPOA (Carole Magnuson), dated December 14, 2002

Response to Comment 9-1

This comment contains introductory information, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. Therefore, no response is required.

Response to Comment 9-2

This comment is acknowledged. In accordance with CEQA, the project-level analysis for the Northwest Housing Infill Project included all reasonably foreseeable components of the project. However, only the housing facilities and the parking structure are now being proposed for approval concurrently with the 2002 LRDP. The recreation and facilities management storage improvements are not being proposed because the funding for these components remains uncertain, the design is not available, and the timing is speculative. If funding for these components is obtained, the scope and design, including descriptors for utilization, would be formulated in more detail, and will involve further dialog with WHPOA. At that time, the campus will review such proposals with WHPOA as has been the case for this and prior projects within the area defined by the Stipulated Use Agreement between the WHPOA and The Regents of the University of California in 1978, prior to conducting any further necessary CEQA review.

Response to Comment 9-3

Refer to Response to Comment 9-2 for a discussion of the status of the recreation and facilities management storage components of the NHIP and further CEQA review of the NHIP component of the 2002 LRDP.

Response to Comment 9-4

Refer to Response to Comment 9-2 for a discussion of the status of the facilities management storage component of the NHIP and further CEQA review of the NHIP component of the 2002 LRDP.

Response to Comment 9-5

Refer to Response to Comment 9-2 for a discussion of the status and need for further CEQA review of the facilities management storage component of the NHIP.

Section 4.1 (Aesthetics) of the 2002 LRDP Draft EIR (Volume 2, page 4.1-12) provides that PP 4.1-2(e) shall be continued throughout the 2002 LRDP planning horizon. PP 4.1-2(e) states: "The western, northern, and eastern edges of the main campus shall include a landscaped buffer to complement the

residential uses of the surrounding community and to provide an attractive perimeter that effectively screens and enhances future development.”

The Veteran Avenue edge, as shown in Figure 4.1-8 (Campus Edges) (Volume 1, page 4.1-13) consists of closely spaced Camphor trees within a turf-planted parkway, a jogging path, and an 8-foot fence densely covered with ivy. No campus structures are directly visible from street level along the Veteran Avenue edge. It is not clear from the comment what is meant by the statement that the Veteran Avenue “edge is not fully completed.” The comment acknowledges that landscaping, such as street trees and ivy-covered fences, exist at this side of the site; however, the comment does not suggest what further buffering or screening is needed, or suggest why “a minimum standard for adequate buffering behind the fence” is needed and for what purpose.

The campus already provides and maintains the existing landscape along the Veteran Avenue edge as an attractive perimeter to serve as a visual buffer between campus uses and the neighboring single-family residences across the street. No further buffer to provide visual screening is necessary along the Veteran Avenue edge.

The 2002 LRDP Draft EIR (Volume 2, page 3-18) identified the height of the proposed facility as one-story, and the proposed location of the building was disclosed on page 3-19. As required by 2002 LRDP EIR MM 4.1-3(b), which has been incorporated into the proposed project, all project components (which includes the proposed storage facility) would provide downcast and shielded lighting to minimize stray light spillover onto adjacent uses either on or off campus. Further, as described on page 4.1-25, analysis of the security lighting impacts from the proposed storage facility on adjacent residential uses concluded that the continued provision of landscaped buffer along Veteran Avenue, as required by 2002 EIR PP 4.1-2(e), would continue to shield and screen adjacent residential uses from light and glare. In addition, due to the single story height of the proposed facility and the existing landscaped buffer (e.g., ivy-covered fence and street trees) along Veteran Avenue, there will continue to be limited outside views of campus buildings.

Response to Comment 9-6

Refer to Response to Comment 9-2 for a discussion of the status and need for further CEQA review of the facilities management storage component of the NHIP.

Response to Comment 9-7

Refer to Response to Comment 9-2 for a discussion of the status of the facilities management storage component of the NHIP and further CEQA review of the NHIP component of the 2002 LRDP.

Response to Comment 9-8

Refer to Response to Comment 9-2 for a discussion of the status of the recreation and facilities management storage components of the NHIP and further CEQA review of the NHIP component of the 2002 LRDP.

Response to Comment 9-9

Refer to Response to Comment 9-2 for a discussion of the status of the facilities management storage component of the NHIP and further CEQA review of the NHIP component of the 2002 LRDP.

Response to Comment 9-10

Refer to Response to Comment 9-2 for discussion of the status of the recreation and facilities management storage components of the NHIP.

Response to Comment 9-11

Refer to Response to Comment 9-2 for a discussion of the recreation component of the NHIP. Because these uses are not proposed at this time, no additional response is necessary.

Response to Comment 9-12

Refer to Response to Comment 9-2 for a discussion of the status of the recreation and facilities management storage components of the NHIP.

Response to Comment 9-13

Refer to Response to Comment 9-2 for a discussion of the status of the recreation component of the NHIP.

Response to Comment 9-14

Refer to Response to Comment 9-2 for discussion regarding further communication with Westwood Hills Property Owners Association (WHPOA) regarding future improvements associated with the recreation and facilities management storage components of the NHIP.

The campus remains committed to meeting with WHPOA as it has during the formulation of the NHIP. The campus staff and executive management have met with representatives of WHPOA and other neighborhood groups at regularly scheduled community leader meetings in which the proposed project and other issues of interest were presented and discussed. These meetings occurred on July 10, 2001, January 30, 2002, and November 7, 2002. In addition, the campus met exclusively with representatives of WHPOA on August 16, 2001, March 6, 2002, and May 20, 2002, to specifically review the components of the NHIP. As a result of concerns expressed by the WHPOA at these meetings, the

project was modified and the parking structure was changed from a proposed location at Lot 15 to its current proposed site, south of Dykstra Hall. This change, although not inconsequential to the project development schedule and cost, was made specifically to address the request from WHPOA. Additionally, the campus committed to retain all mature trees along the western edge of Lot 15 in order to maintain the existing landscape as a visual screen for the proposed recreation facility from views west of Veteran Avenue. Finally, to address WHPOA concerns over potential noise emanating from the proposed recreation facility, specific noise measurements were taken from one of the homes of a WHPOA representative in order to accurately assess noise impacts to residents located at the same elevation to the west of the proposed recreation site. These noise measurements were used as a basis for the noise analysis provided in the 2002 LRDP Draft EIR.

The campus remains committed to conducting regular meetings with local community groups to maintain the ongoing exchange of ideas and information and to pursue solutions for planning issues that confront both the campus and the community. As indicated in Response to Comment 9-2, if the recreation and facilities management storage improvements become feasible, the scope and design would be further refined, which will involve further dialog with WHPOA. When the funding, design and timing of the recreation and facilities management improvements are determined, the campus will review such proposals with WHPOA as has been the case for this and prior projects within the area defined by the Stipulated Use Agreement, prior to conducting any further necessary CEQA review.

Response to Comment 9-15

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of enrollment growth at UCLA and throughout the University of California system. In addition, refer to Chapter 6 (Alternatives) of the 2002 LRDP Draft EIR for a discussion of project alternatives, including an evaluation of the environmental impacts that would result from implementation of each of the alternatives.

Response to Comment 9-16

According to the generalized circulation map of the Westwood Community Plan area that is available online (<http://www.lacity.org/pln/complan/westla/pdf/gencircmap.wwd.pdf>), Veteran Avenue is a secondary highway between Wilshire and Sunset Boulevards.

The comment correctly noted an error in the 2002 LRDP Draft EIR with respect to the designation of Tiverton Avenue. The text of the 2002 LRDP Draft EIR is revised as follows (Volume 1, page 4.13-5):

Tiverton Avenue—A short secondary ~~roadway~~ highway running between Lindbrook Drive and Le Conte Avenue with on-street parking allowed on both sides of the street. North of Le Conte Avenue, the

roadway enters the UCLA campus and becomes Tiverton Drive. Parking is provided on both sides of the street.

Although the designation of certain roadway segments as secondary highways may indicate a potential for future highway improvements that could expand roadway capacity, no such future capacity improvements were assumed for either Veteran Avenue or Tiverton Drive. The traffic analysis in the 2002 LRDP Draft EIR used existing roadway characteristics (e.g., number of lanes and turning radii) to calculate roadway capacity, and the analysis in the 2002 LRDP Draft EIR was not affected by the minor error with respect to the designation of Tiverton Avenue, or the change in the designation of Veteran Avenue suggested in this comment.

In developing the traffic model used in the 2002 LRDP Draft EIR, a list of approved, in progress, and funded transportation improvements was developed. Because the closure of the Waterford on-ramp to the I-405 has not been approved or funded by Caltrans, no reduction in freeway access was assumed in the traffic analysis in the 2002 LRDP Draft EIR. If Caltrans does elect to proceed with the closure of the Waterford on-ramp, Caltrans would be the Lead Agency under CEQA.

Response to Comment 9-17

The 2002 LRDP Draft EIR (Volume 1, page 4.13-47) included the following program, practice, and procedure:

PP 4.13-1(a) The campus shall continue to maintain the 1990 LRDP vehicle trip cap of 139,500 average daily trips.

In order to demonstrate that the trip cap is being adhered to, the University will continue to monitor compliance with the trip cap throughout the planning horizon of the 2002 LRDP. To provide a comparative basis with historical counts, future cordon counts would be conducted in a manner consistent with the previous counts and the results of future counts will continue to be transmitted to LADOT and be made otherwise available on request.

Response to Comment 9-18

Refer to Response to Comment 8-6 for a discussion of the proposed mitigation for impacts to trees resulting from on-campus development under the 2002 LRDP EIR (e.g., the tree replacement plan).

Response to Comment 9-19

Refer to Response to Comment 9-2 for discussion of the status of the recreation and facilities management storage components of NHIP with respect to project approval. Refer to Responses to Comments 9-2 through 9-18 for discussion regarding the environmental issues raised in those comments.

Refer also to Response to Comment 8-11 and 12-46 for a discussion regarding why recirculation of the 2002 LRDP Draft EIR is neither necessary nor required.

Lelah, Tova

From: Alvin134@cs.com
 Sent: Thursday, November 28, 2002 12:56 PM
 To: jerbrown@ucla.edu; kapsalmart@worldnet.att.net; DicDoc108@aol.com;
 longcore@urbanwildlands.org; info@yournorthvillage.org; Magnuson, Carole; Brueggemann,
 Diana (Govt & Cmnty Rel)
 Subject: Re UCLA's EIRs for (1) its 2002 Long Range Development Plan (the 2002 LRDP) and

UCLA WATCH
 134 Greenfield Avenue
 Los Angeles, CA 90049
 Tel: 310.472.6799, Fax: 310.472.5652

November

27, 2002
 Richard C. Atkinson
 President
 University of California
 Via Fax: (510)987-9074

Re UCLA's EIRs for (1) its 2002 Long Range Development
 Plan (the 2002 LRDP) and (2) its Northwest Housing Infill Project (NHIP)

Dear Sir:

On behalf of the concerned citizens, faculty, students and community
 organizations representing thousands of UCLA's neighbors, UCLA Watch
 respectfully requests that the public be granted an additional 45 days so
 that it may have an opportunity to meet with UCLA's planners and to review
 and prepare responses to these two massive documents.

The University of California CEQA Handbook at Chapter 4.1 provides that:
 "The goal of fully informing the public of the effects of development is at
 the heart of CEQA. Public involvement in the CEQA process aims to ensure that
 the public has a voice in the decision-making process - specifically, that
 public concerns about environmental issues and the potential effect of
 development on the physical environment are addressed prior to project
 approval.
 "The process of interacting with . . . the public can often be as important
 as the technical content of the environmental document. The public
 involvement process can enhance both the quality and credibility of the
 document, if conducted properly. It can also avoid costly project delays that
 result from political or bureaucratic processes.
 "CEQA requires certain public involvement actions and encourages others."
 (Emphasis added.)

The UC CEQA Handbook states (at Chapter 4.2): "Public involvement programs
 focus on a positive process for achieving decisions on project issues. It
 recognizes that each party involved has a different set of values and
 priorities. Although these concepts are familiar to many of us, the timing of
 the process is not. Using a well thought out public involvement program
 . . . is fast becoming an antidote to failed or stalled environmental
 initiatives, projects, and processes.

"In public involvement, it is the quality of the communication that is most
 important. This generally consists of making a sincere effort to listen to,
 and understand, community concerns, and to make every attempt possible to
 develop a creative solution that is acceptable to the community and meets the
 academic, program, and fiscal objectives of the campus. The establishment of
 project alternatives and mitigation measures, and seeking an acceptable
 middle ground is often the key aspect of this process. Even if consensus on
 the project cannot be found, the scope of the environmental document can be
 improved so that the report responds to community concerns, and is more

10-1

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legally defensible."
(Emphasis added.)

Among the methods suggested in the UC CEQA Handbook for achieving the important goal of public involvement is meeting with community groups. The Handbook provides that "During the meeting, the Campus explains the project, answers questions, and receives input. . . . It is important that the Campus and its consultants be receptive to the public and its suggestions at these community meetings." (Emphasis added.)

Other methods suggested in the UC CEQA Handbook for achieving public involvement include public workshops; citizen advisory committees; and a campus/community task force.

The essential issue is that the public be given a full and adequate opportunity to meet with the campus planners regarding these projects. The public has not been afforded this opportunity nor has the public been afforded adequate time to review and respond to these EIRs.

The UC Handbook also cautions against scheduling the review period during finals or over holidays to ensure that the faculty, students and the public have an adequate opportunity to comment. UCLA could not have picked a much worse time to schedule a review period for these EIRs. The period includes not one but two holidays - Thanksgiving and Veterans Day - and the review period also includes the finals for the fall quarter!! The arrogance of UCLA's Capital Program department knows no bounds. (The enclosed letter entitled "UCLA Capital Programs Overhaul Needed" is right on point.)

Not only do the requirements of the UC CEQA Handbook require that the review period be extended so that the faculty, students and public have an adequate opportunity to review and respond but also that the public have an opportunity to meet with UCLA's planners and that the planners make "a sincere effort to listen to, and understand community concerns, and to make every attempt possible to develop a creative solution that is acceptable to the community" (Emphasis added.)

Furthermore, UCLA's 1990 LRDP states that "[a]n important goal of [UCLA's] long range development planning is a harmonious relationship between the campus and the community." And it provides, as does the 2002 LRDP, that in the interest of good neighborliness and conscientious planning that the campus will maintain an ongoing exchange of ideas and information to pursue mutually acceptable resolution of the issues. We have asked UCLA many times to live up to its promises, but its representatives have refused. Chancellor Carnesale has also made a commitment to consult with the community, but, according to the University's representatives, he too refuses to keep his promise.

The community's request is not difficult to fulfill - some additional time to meet with the UCLA's planners to discuss the projects and to comment in writing so that the Regents have the benefit of the input of the faculty, students and the public. After all, these two projects will have significant impacts on the campus and the community for many years to come, e.g., the LRDP goes to 2010 and the buildings and their impacts will be forever; and UCLA has been working on these projects for years; fair play demands that the faculty, students and public be given due process as provided in the UC CEQA Handbook and that UCLA live up to its many promises. Please help.

Sincerely,

Alvin Milder
Chair, UCLA Watch

cc:
Regents, University of California
Albert Carnesale, Chancellor UCLA

Honorable Gray Davis
Honorable Sheila Kuehl
Honorable Zev Yaroslavsky
Honorable Jack Weiss
Brentwood Glen Homeowners Association
Brentwood Homeowners Association
Friends of Westwood
Holmby-Westwood Property Owners Association
North Westwood Village Residents Association
Residents of Beverly Glen
Roscomare Valley Homeowners Association
Save the Village
Westside Community Planning Council
Westwood Homeowners Association
Westwood Hills Property Owners Association

[Attachment referred to in above letter]

Letter to the UCLA Bruin Editor and to Chancellor Carnesale

UCLA Capital Programs Overhaul Needed

The LA Times staff writer Bob Pool wrote a June 20, 2001, article titled "UCLA Fells Trees on Westwood Blvd." This sad article reports the destruction of the Daughters of the American Revolution (DAR) eucalyptus trees that have lined Westwood Boulevard since 1929. These stately testimonies to a long tradition of a beautifully landscaped campus have been chopped down overnight by the authority of Capital Programs Vice Chancellor Peter Blackman who made the call to chainsaw them all down because of an apparent safety concern. This overbearing clear cutting of public lands could certainly have been stopped, halted, ameliorated, or limited to certain unstable trees, had the rest of the community been consulted beforehand, but this wouldn't fit the intention of the Vice Chancellor. This action is typical for this Vice Chancellor, who has skirted responsibility thus far on numerous issues by relying on a limited group of "consultants" who surprisingly support his particular point of view. Why hasn't Mr. Blackman been called to task, on the various design and construction cost overruns during his tenure, due to the "UCLA factor" of instability he has created? The outside community knows this factor well. Ignoring community interests, however, has long been a specialty of Blackman and his staff; an organization known better as construction addicted and whose leader has come to be known better as Machiavellian because of his duplicity and deceit. Actions such as the destruction of the DAR trees are only another example of his irresponsibility that he defends with myopic tenacity.

Why hasn't Mr. Blackman been questioned about his chaotic handling of the FEMA crisis, or the Medical Center financing? Other than the original campus buildings that have been strengthened, can anyone really say that our campus has become more of a place we are proud to belong to, such as the harsh Med Plaza built a few years ago, the harsh northwest housing project that was so poorly constructed, or the factory in the center of the campus known as the Vline Chiller/CoGen? What of the sterile new Medical Center currently under construction or the proposed gargantuan and over-budget 2,000 bed/2,000 car Southwest Housing project? Has anyone questioned Mr. Blackman about his inability to manage a department (Capital Programs) famous for its indifference to students, faculty, deans, the surrounding Westwood and BeI-Air communities as well as the sequestering of his own staff?

And what about the prison-like architecture currently under construction on lot 32? Is this project an indication that the direction of UCLA's tomorrow is going to look harsher, cheaper, and more prison-like? Why has former attorney Vice Chancellor been able to make so many bad decisions for our campus which have affected and will continue to affect so many of us for years to come? Please Chancellor Carnesale, isn't Vice Chancellor Blackman long overdue for a thorough investigation or replacement? This prince has no clothes! Can you halt him before more urbanization is done to our once bucolic campus?

Anonymous for fear of reprisal by the Vice Chancellor

Response to Comment Letter 10

Letter from UCLA Watch (Alvin Milder), dated November 27, 2002

Response to Comment 10-1

Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation.

Response to Comment 10-2

Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation.

The NOP was distributed to the commenter. Further, the commenter attended the Community Information and EIR Scoping Meeting for the proposed project and provided verbal comments, which were incorporated into the 2002 LRDP Draft EIR. The commenter also attended the public hearing and provided verbal comments, in addition to three written comment letters, all of which are being responded to in this 2002 LRDP Final EIR. Lastly, the commenter attended three Community Leader Meetings where updates on the LRDP update process were provided.

Response to Comment 10-3

Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation. The document referenced, "UCLA Capital Programs Overhaul Needed," neither contains a comment directed at the physical environmental effects of the 2002 LRDP, as analyzed in the 2002 LRDP Draft EIR, nor a comment on the adequacy of the 2002 LRDP Draft EIR as an informational document in accordance with the requirements of CEQA. This letter instead addresses previous construction and past events unrelated to the 2002 LRDP Draft EIR. Nonetheless, this document will be included in the administrative record for the 2002 LRDP.

Response to Comment 10-4

Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the adequacy of the public review period for the 2002 LRDP Draft EIR. In addition, as described in Responses to Comments 9-2 and 12-54, the University regularly meets with the community to discuss matters of mutual interest, including the preparation of environmental documents. The University shall continue to conduct regular meetings with local community groups to maintain an ongoing exchange of ideas and

information and to pursue solutions for planning issues that confront both the University and the community.

Response to Comment 10-5

The University agrees with the commenter's opinion that the 2002 LRDP Draft EIR, including the NHIP component, are important and that the public should be given due process to prepare comments in response to the 2002 LRDP Draft EIR. To that end, the University has provided the public with a comment period that exceeds CEQA requirements and has provided several convenient options for submitting comments, including via email, the capital programs website, fax, and standard mail. Interested parties also had the opportunity to submit verbal comments during a public meeting. Refer also to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the adequacy of the public review period for the 2002 LRDP Draft EIR.

Following the public hearing and after the close of the written public comment period on the 2002 LRDP Draft EIR, responses to written and recorded comments were prepared and published. The 2002 LRDP Final EIR, which consists of the 2002 LRDP Draft EIR, comments on the 2002 LRDP Draft EIR, written responses to those comments, and the Mitigation Monitoring and Report Program (MMRP), will be considered by The Regents, consistent with Section 15090 of the *CEQA Guidelines*, prior to any decision to approve or reject the proposed project.

The University also notes that the commenter submitted three written comment letters and provided oral comments at the November 20, 2002, public hearing. Responses to all comments, whether written or oral, have been provided in the 2002 LRDP Final EIR.

Lelah, Tova

From: Alvin134@cs.com
Sent: Thursday, November 28, 2002 1:15 PM
To: tlelah@ucla.edu
Subject: EIRs

Please be sure to include my 11-27-02 letter to President Atkinson with both the LRDP EIR and with the NHIP EIR.
Thank you,

Alvin Milder

11-1

Response to Comment Letter II

E-mail from Alvin Milder, dated November 28, 2002

Response to Comment II-I

The November 27, 2002, letter from Alvin Milder to President Atkinson has been included in the Final EIR as Comment Letter 11a. Refer to the responses to Comment Letter 11a below.

Comment Letter 11a

UCLA WATCH
134 Greenfield Avenue
Los Angeles, CA 90049
Tel: 310.472.6799, Fax: 310.472.5652

November 27, 2002

Richard C. Atkinson
President
University of California
Via Fax: (510)987-9074

Re UCLA's EIRs for (1) its 2002 Long Range Development Plan (the 2002 LRDP) and
(2) its Northwest Housing Infill Project (NHIP)

Dear Sir:

On behalf of the concerned citizens, faculty, students and community organizations representing thousands of UCLA's neighbors, UCLA Watch respectfully requests that the public be granted an additional 45 days so that it may have an opportunity to meet with UCLA's planners and to review and prepare responses to these two massive documents.

The University of California CEQA Handbook at Chapter 4.1 provides that: "The goal of fully informing the public of the effects of development is at the heart of CEQA. Public involvement in the CEQA process aims to ensure that the public has a voice in the decision-making process - specifically, that public concerns about environmental issues and the potential effect of development on the physical environment are addressed prior to project approval.

"The process of interacting with . . . the public can often be as important as the technical content of the environmental document. The public involvement process can enhance both the quality and credibility of the document, if conducted properly. It can also avoid costly project delays that result from political or bureaucratic processes.

"CEQA requires certain public involvement actions and encourages others." (Emphasis added.)

The UC CEQA Handbook states (at Chapter 4.2): "Public involvement programs focus on a positive process for achieving decisions on project issues. It recognizes that each party involved has a different set of values and priorities. Although these concepts are familiar to many of us, the timing of the process is not. Using a well thought out public involvement program . . . is fast becoming an antidote to failed or stalled environmental initiatives, projects, and processes.

"In public involvement, it is the quality of the communication that is most important. This generally consists of making a sincere effort to listen to, and understand, community concerns, and to make every attempt possible to develop a creative solution that is acceptable to the community and meets the academic, program, and fiscal objectives of the campus. The establishment of project alternatives and mitigation measures, and seeking an acceptable middle ground is often the key aspect of this process. Even if consensus on the project cannot be found, the scope of the environmental document can be improved so that the report responds to community concerns, and is more legally defensible." (Emphasis added.)

11a-1

11a-2

Among the methods suggested in the UC CEQA Handbook for achieving the important goal of public involvement is meeting with community groups. The Handbook provides that "During the meeting, the Campus explains the project, answers questions, and receives input. . . . It is important that the Campus and its consultants be receptive to the public and its suggestions at these community meetings." (Emphasis added.)

Other methods suggested in the UC CEQA Handbook for achieving public involvement include public workshops; citizen advisory committees; and a campus/community task force.

The essential issue is that the public be given a full and adequate opportunity to meet with the campus planners regarding these projects. The public has not been afforded this opportunity nor has the public been afforded adequate time to review and respond to these EIRs.

The UC Handbook also cautions against scheduling the review period during finals or over holidays to ensure that the faculty, students and the public have an adequate opportunity to comment. UCLA could not have picked a much worse time to schedule a review period for these EIRs. The period includes not one but two holidays - Thanksgiving and Veterans Day - and the review period also includes the finals for the fall quarter!! The arrogance of UCLA's Capital Program department knows no bounds. (The enclosed letter entitled "UCLA Capital Programs Overhaul Needed" is right on point.)

Not only do the requirements of the UC CEQA Handbook require that the the review period be extended so that the faculty, students and public have an adequate opportunity to review and respond but also that the public have an opportunity to meet with UCLA's planners and that the planners make "a sincere effort to listen to, and understand community concerns, and to make every attempt possible to develop a creative solution that is acceptable to the community" (Emphasis added.)

Furthermore, UCLA's 1990 LRDP states that "[a]n important goal of [UCLA's] long range development planning is a harmonious relationship between the campus and the community." And it provides, as does the 2002 LRDP, that in the interest of good neighborliness and conscientious planning that the campus will maintain an ongoing exchange of ideas and information to pursue mutually acceptable resolution of the issues. We have asked UCLA many times to live up to its promises, but its representatives have refused. Chancellor Carnesale has also made a commitment to consult with the community, but, according to the University's representatives, he too refuses to keep his promise.

The community's request is not difficult to fulfill - some additional time to meet with the UCLA's planners to discuss the projects and to comment in writing so that the Regents have the benefit of the input of the faculty, students and the public. After all, these two projects will have significant impacts on the campus and the community for many years to come, e.g., the LRDP goes to 2010 and the buildings and their impacts will be forever; and UCLA has been working on these projects for years; fair play demands that the faculty, students and public be given due process as provided in the UC CEQA Handbook and that UCLA live up to its many promises.

Please help.

Sincerely,

Alvin Milder
Chair, UCLA Watch

11a-2

11a-3

11a-4

cc:

Regents, University of California
Albert Carnesale, Chancellor UCLA
Honorable Gray Davis
Honorable Sheila Kuehl
Honorable Zev Yaroslavsky
Honorable Jack Weiss
Brentwood Glen Homeowners Association
Brentwood Homeowners Association
Friends of Westwood
Holmby-Westwood Property Owners Association
North Westwood Village Residents Association
Residents of Beverly Glen
Roscomare Valley Homeowners Association
Save the Village
Westside Community Planning Council
Westwood Homeowners Association
Westwood Hills Property Owners Association

Letter to the UCLA Bruin Editor and to Chancellor Carnesale

UCLA Capital Programs Overhaul Needed

The LA Times staff writer Bob Pool wrote a June 20, 2001, article titled "UCLA Fells Trees on Westwood Blvd." This sad article reports the destruction of the Daughters of the American Revolution (DAR) eucalyptus trees that have lined Westwood Boulevard since 1929. These stately testimonies to a long tradition of a beautifully landscaped campus have been chopped down overnight by the authority of Capital Programs Vice Chancellor Peter Blackman who made the call to chain-saw them all down because of an apparent safety concern. This overbearing clear cutting of public lands could certainly have been stopped, halted, ameliorated, or limited to certain unstable trees, had the rest of the community been consulted beforehand, but this wouldn't fit the intention of the Vice Chancellor. This action is typical for this Vice Chancellor, who has skirted responsibility thus far on numerous issues by relying on a limited group of "consultants" who surprisingly support his particular point of view. Why hasn't Mr. Blackman been called to task on the various design and construction cost overruns during his tenure, due to the "UCLA factor" of instability he has created? The outside community knows this factor well. Ignoring community interests, however, has long been a specialty of Blackman and his staff, an organization known better as construction addicted and whose leader has come to be known better as Machiavellian because of his duplicity and deceit. Actions such as the destruction of the DAR trees are only another example of his irresponsibility that he defends with myopic tenacity.

Why hasn't Mr. Blackman been questioned about his chaotic handling of the FEMA crisis, or the Medical Center financing? Other than the original campus buildings that have been strengthened, can anyone really say that our campus has become more of a place we are proud to belong to, such as the harsh Med Plaza built a few years ago, the harsh northwest housing project that was so poorly constructed, or the factory in the center of the campus known as the Chiller/CoGen? What of the sterile new Medical Center currently under construction, or the proposed gargantuan and over-budget 2,000 bed/2,000 car Southwest Housing project? Has anyone questioned Mr. Blackman about his inability to manage a department (Capital Programs) famous for its indifference to students, faculty, deans, the surrounding Westwood and Bel-Air communities as well as the sequestering of his own staff?

And what about the prison-like architecture currently under construction on Lot 32? Is this project an indication that the direction of UCLA's tomorrow is going to look harsher, cheaper, and more prison-like? Why has former attorney Vice Chancellor been able to make so many bad decisions for our campus which have affected and will continue to affect so many of us for years to come? Please Chancellor Carnesale, isn't Vice Chancellor Blackman long overdue for a thorough investigation or replacement? This prince has no clothes! Can you halt him before more urbanization is done to our once bucolic campus?

Anonymous for fear of reprisal by the Vice Chancellor

UCLA WATCH
134 Greenfield Avenue
Los Angeles, CA 90049
Tel: 310.472.6799, Fax: 310.472.5652

December 19, 2002

Richard C. Atkinson
President
University of California
Via Fax: (510)987-9074

Re UCLA's EIRs for (1) its 2002 Long Range Development Plan (the 2002 LRDP) and
(2) its Northwest Housing Infill Project (NHIP)

Dear Sir:

In your letter of December 4, in reply to my letter of November 27, you encouraged me "to continue working with [Chancellor Carnesale] and his staff" to address the community's concerns. It has been over two weeks since I received your letter, which showed a copy being sent to Chancellor Carnesale, and I have not had a response from anyone at UCLA. Unfortunately it is not possible to work with them if they will not give us the courtesy of a reply.

This issue is a much more important matter than the lack of manners by UCLA personnel. The proposals in the above referenced EIRs will have far reaching effects – the LRDP will add thousands of students to the campus and will last for at least ten years, and the NHIP will, among other things, add three massive buildings, each 9-stories in height, to an already over-crowded campus. These triple-towers will be built on the highest hill on the campus and will, of course, be eye-sores for decades.

The community needs your help. UCLA, consistent with its "neighbors and the environment be damned" approach, has once again violated the requirements of CEQA, the CEQA Guidelines, and the UC CEQA Handbook. UCLA has ignored its many commitments to consult with the community and "to pursue mutually acceptable resolution of the issues" [UCLA's 1990 LRDP, p.7], and it has breached its promise "to keep [me] fully informed and to learn about and respond to [our] concerns, along with those of other interested and affected constituents." [Letter from Chancellor Carnesale, April 6, 2000.]

N.B.: UCLA's refusal to discuss with the community our concerns about the gigantic triple-towers, which true to their names, will tower over the neighborhood, is a particularly egregious and odious breach of UCLA's promises and of the requirements of CEQA. And its review of only two alternatives in the NHIP DEIR shows its disdain for the environmental process.

The above referenced EIRs are for two distinct proposals – a program EIR for the LRDP and a project EIR for the NHIP, and it is unfair and unconscionable to require the community to do its duty as citizens in the minimal amount of time allowed by UCLA's bureaucrats. The DEIRs are in three volumes containing over a thousand pages and to read, review and prepare responses for each of the DEIRs in the time allotted is virtually impossible. Failure to grant the community sufficient time deprives the public of "a voice in the decision-making process – specifically, that public concerns about environmental issues and the potential effect of development on the physical environment are addressed prior to project approval." (UC CEQA Handbook: Chapter 4.1.)

Please grant the community sufficient review time so that it may have a meaningful voice in the decision-making process; as noted in the UC CEQA Handbook, at Chapters 4.1 and 4.2: "The public involvement process can enhance both the quality and credibility of the document, if conducted properly. It can also avoid costly project delays that result from political or bureaucratic processes. . . . In public involvement, it is the quality of the communication that is most important. **This generally consists of making a sincere effort to listen to and understand, community concerns, and to make every attempt possible to develop a creative solution that is acceptable to the community and meets the academic, program, and fiscal objectives of the campus. The establishment of project alternatives and mitigation measures, and seeking an acceptable middle ground is often the key aspect of this process.**" [Emphasis added.]

Again, please help; all the community is asking for is an opportunity to have a meaningful involvement in the process and to have UCLA honor its many promises regarding consultations with the community.

Sincerely,

Alvin Milder
Chair
UCLA Watch

cc:

Regents, University of California
Albert Carnesale, Chancellor UCLA
Honorable Gray Davis
Honorable Sheila Kuehl
Honorable Zev Yaroslavsky
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Brentwood Glen Homeowners Association
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Roscomare Valley Homeowners Association
Save the Village
Westside Community Planning Council
Westwood Homeowners Association
Westwood Hills Property Owners Association
Daily Bruin
Los Angeles Times

DAILY BRUNN

EDITORIAL

Administration must stop building boom

CONSTRUCTION: Campus has no need for more new structures while green open areas are demolished

Chancellor Young made a commitment at the beginning of his tenure to preserve UCLA's "park-like atmosphere." Something most have given up on, but even UCLA does not have a park-like atmosphere. UCLA has concrete quads, multi-level parking structures, rapidly expanding office buildings, and a student store that resembles a shopping mall.

Within UCLA's mythical garden setting, the walkways are cluttered with heavy equipment and debris, and the air is thick with construction-related dust and noise. Worst of all, there is no end in sight.

Whenever a major project is completed and students, faculty and local residents breathe a sigh of relief, a massive new project begins.

Central campus is a perfect example. Immediately following the completion of Ackerman Union - before anyone could enjoy the full - the area was fenced off and Brum Walk was gutted in order to re-route a water main that impedes the expansion of a parking lot.

Following the relocation of the water main, officials at Capital Programs hope to demolish the existing Athletics Hall of Fame building and expand the Morgan Intercollegiate Athletics Center into Bruin Plaza Park.

The result? A loss of more campus green space and the continuation of major construction in central campus for at least another year.

Capital Programs officials are so construction-minded that they are using a dubious sleight-of-hand technique

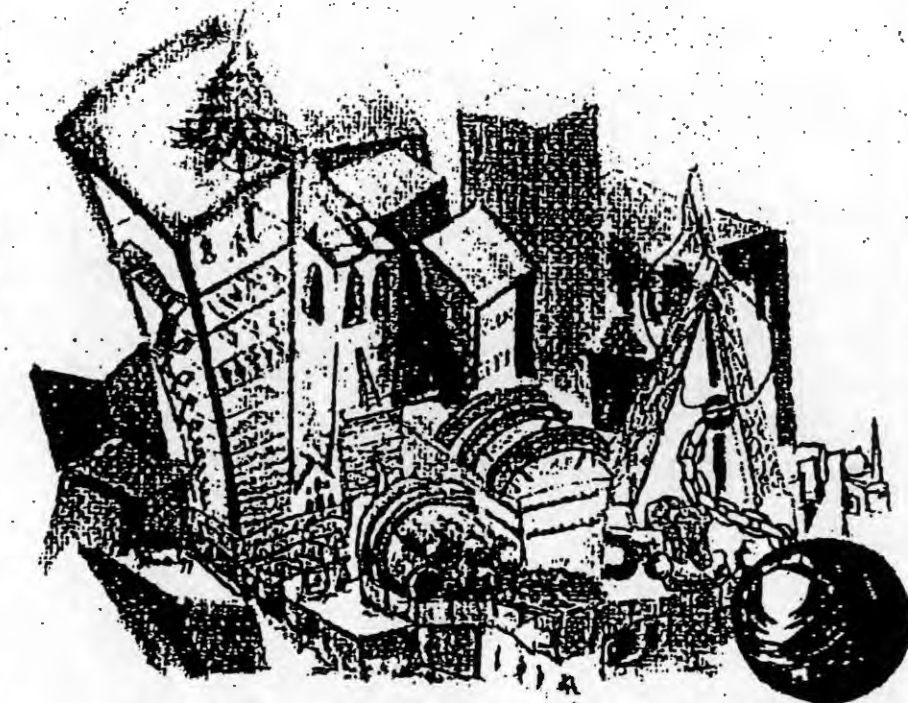
in order to gain approval for the Morgan Center expansion. The non-obvious maneuvers are represented in their attempt to sidestep UCLA's Long Range Development Plan (LRDP).

The LRDP was established in 1990 to regulate UCLA's physical development. Because the proposed Morgan Center expansion exceeds construction allowances for central campus, Capital Programs is attempting, through an amendment to "transfer" square footage allowances from a UCLA parking lot located off-campus.

The attempt to amend the LRDP and transfer square footage allowances from one area of campus to another is an obviously self-serving tactic that challenges our ability to see Capital Programs as even slightly mindful of the LRDP. The LRDP is worthless if this abusive technique succeeds and the Morgan Center project is approved.

This devil-take-the-hindmost approach has allowed UCLA planners to pour a concrete slab over the area's natural setting. As Capital Programs' proposed amendment demonstrates, UCLA has lost sight of long-term environmental integration or conservation. The campus is growing for growth's sake, and it is time for administrators to settle down.

Current and planned projects include a 12-year plan to rebuild the quake-damaged Center for Health Sciences, expansion of the Law School, a new International Students Center, the gutting of



Bruin Walk, the excavation of the IM field for subterranean parking, remodeling the Chancellor's villa, and the ongoing renovations at Royce Hall. Proposed projects include the expansion of Morgan Center, Dykstra Hall and remodeling of the James Bridges Theatre.

It seems the only permanent aspect of UCLA is its propensity for construction. And with each new

project, UCLA becomes more and more pumpled. Although most campus architects show an affinity for red bricks, there is no architectural continuity throughout the campus. If the dust ever settles, campus visitors will see how the buildings were carelessly thrown together in a mad dash for development.

We hope that Chancellor-designate Carmichael will arrive in July

and see the administration's disdain for the environment and apply the linker. UCLA is a dense mass of patchwork architecture mirroring greater Los Angeles. It is a paved commercial landscape surrounding underfunded academic programs, and administrators need to re-examine their priorities.

Finish what you've already turned up, then give it a rest.

THE DAILY BRUIN ONLINE 11/19/2002

Editorial: State budget woes warrant enrollment caps

Great strides have been taken at the University of California to reform admissions policy to make it accessible to more students. But unless the university wants to teach them in an overcrowded environment with strained resources, it's going to have to find a way to pay for it on its own.

The state, for the most part, is out of the question; it's trying to find ways to distribute budget cuts, not dispense handouts, given its \$21 billion deficit for the 2003-2004 fiscal year. This is not a one-time deal either. Recent estimates predict the state will face \$12-\$16 billion deficits for at least the next five years. The only thing worse than this is the fact that it will occur alongside the unfolding of Tidal Wave II, the projected addition of 60,000 students to the UC by the year 2010.

Last year, the UC had to accommodate budget cuts as well – it had to downsize by 10 percent, as well as increase fees for out-of-state students. Among the ideas for helping reduce the amount of cutting the UC will have to do is the idea of raising student fees for resident undergraduates as well. Research grant and student service funding will also likely face cuts. Without the state's help, it's either raise fees or start cutting from important areas. For example, last year, Davis proposed cutting \$33 million out of outreach programs.

The UC's dual admissions program – which would guarantee admission to one of the UC campuses to students who are not in the top 12.5 percent of the state's high school graduates but between the top 4 to 12.5 percent of their high school, on the condition that they complete major requirements at community colleges – is still on hold because there's no money to launch it.

The state and the university have worked out a partnership where the UC gets funding increases as it accepts more students into the system. Although the state has done what it can to live up to the agreement, it has only been able to do so partially.

Unless there are multiple David Geffens waiting to be tapped, the university is on its own. As of now, the state taxpayers only provide about 25 percent of UC funds. This doesn't mean the university is independent of taxpayer responsibilities – it would surely welcome a larger percentage of tax money to meet its cost. It's the University of California for a reason.

This sounds easy, but politics make it hard. Lawmakers know raising taxes and keeping office can be quite at odds with each other come election time, even though Davis did promise to make education his top priority.

The university must act on its own.

The financial situation of the state and consequently, the UC, juxtaposed with its current resources, make the case for a real solution.

Enrollment caps.

It might seem contradictory to advocate against increases in student fees on the basis that it might decrease access to education, and then to advocate for capping enrollment anyway. But it's not.

Increasing student fees makes paying for college a lot more difficult for underprivileged students. But setting enrollment caps doesn't – it reduces the number of students who can attend the UC, but it doesn't subtract from any of the admissions reform policy changes under comprehensive review that would still give students from difficult backgrounds a fair

opportunity.

Enrollment caps don't have to be permanent or equally enforced on all campuses — they're important right now given the difficulty the state is facing. And they're especially important at the two flagship campuses — UCLA and UC Berkeley — facing overcrowding issues that will likely mean more financial difficulty. Should the regents ever choose to do this, these factors should be kept in mind.

Until the state can help the UC meet the costs of growth it can't pay itself, the university has to take matters into its own hands now.

Web Address: <http://www.dailybruin.ucla.edu/news/articles.asp?ID=21778>

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Budget creates need for enrollment caps

EDITORIAL: UC system, UCLA must take care of selves, limit growth if the state draws back support

JCLA has a big problem on its hands: it has too many graduate student prospects, too many undergraduates and too little resources and funding to keep up with them. And it can't turn to the state to bail it out because the state is too busy bailing out itself.

Graduate student applications are streaming into UCLA at record numbers. Engineering programs, for example, are seeing 66 percent increases, while programs in management boast a 75 percent rise in applications. So far, UCLA has 33 percent more applications overall compared to last year. Many believe the unprecedented increase is due to the struggling national economy leaving students with few job options.

At first glance, the increase appears to be a godsend to UCLA, which recently received notice from the UC Commission on the Growth and Support of Graduate Education that the university needs more talented graduate students to maintain its competitiveness with other prestigious universities. But given its resources, UCLA will only be able to accommodate a relatively small increase: only 100-200.

The larger application pool could provide UCLA with a healthy pool to pick top graduate prospects, but the minor stretch room won't help the university bear the sting of its real problem: the spiraling growth of its undergraduate population.

Currently, the number of undergraduates coming to the university is increasing at a rate of 400 students per year. Within the next decade, the UCLA student body is expected to increase by about 4,000 more students—every one of which will need more graduate students to function as teaching assistants and student graders for overcrowded classes.

As with any university, UCLA's goal should be to sustain the quality of its education at the highest levels possible. Limiting the number of graduate students the university accepts to coincide with the number it can reasonably handle protects it from diluting its resources in trying to educate crowds of students.

With Gov. Gray Davis' proposed budget constantly cutting from different places every week—from the funds used to grant a cost of living adjustment to the salaries of faculty and staff, for example—the UC, and especially UCLA, need to seriously consider setting enrollment caps on undergraduate admissions now. UCLA has no place to grow—as the smallest UC, it is surrounded by a large residential area to its northern half and a business community to its south. If the UC is hesitant about setting university-wide enrollment caps, the only feasible alternative is for it to focus on expanding student growth at less populated, larger campuses such as Riverside, Santa Cruz and Merced.

If UCLA doesn't cap enrollment soon, its students will have to pay the price—literally.

Also included in Davis' preliminary state budget is a reduction in \$17 million worth of financial aid across the UC; 95 percent of it will be taken from undergraduates. As the campus with the largest student population, UCLA will take the biggest cut: students on average will be denied about \$490 each. Start looking for a summer job—if there are any left. UCLA has some reserve funds to help cushion the cut in financial aid, but with more mouths to feed, the quantity of porridge each gets decreases.

When voters checked off "Davis" on their ballot, they thought they were selecting someone who prioritizes education. If it is necessary to resort to measures such as increasing taxes, Davis must do so—it doesn't

make sense to take money away from financial aid funds, since they're purportedly going to people who need just that: financial aid.

It's uncertain what will happen come July when Davis signs the final budget – but one thing is certain: the JC must help heal its own wounds if the state won't.

THE DAILY BRUIN ONLINE 12/17/2002

Regents vote 11-4 to raise student fees

By Andrew Edwards
DAILY BRUIN REPORTER
aedwards@media.ucla.edu

For the first time in eight years, the University of California Board of Regents voted Monday to raise systemwide student fees.

In a special meeting held at locations across the state, including UCLA, the board voted 11-4 to approve a \$135 increase in the educational fee that will go into effect in the spring 2003 quarter.

The regents also upped fees for some professional school students by substantially higher amounts, and cut the UC's 2002-2003 budget by tens of millions of dollars.

The fee increase would cover \$19 million out of \$74 million in budget cuts at the UC proposed by Gov. Gray Davis on Dec. 6. Midyear cuts across the state total over \$2 billion.

The UC expects to raise \$28 million through the fee increase, one-third of which will be applied toward financial aid. Combined with Cal Grants, additional UC aid will cover the total costs of increased fees for about one-half of university students who receive financial aid, said budget vice president Larry Hershman.

"We should be able to cover the needy students," he added.

In general needy students are defined as those with annual family incomes under \$60,000.

By approving cuts consistent with those proposed by Davis, the board cut funding in several areas of UC business, but left the instructional programs intact.

However, research, public services and administration were all cut. Hershman said the only way to avoid cuts in instruction was a fee increase.

The state legislature has not yet acted on Davis' proposals. Any changes the legislature makes to the governor's cuts will be incorporated to the UC budget.

UC President Richard Atkinson, who participated at UC San Francisco, said the board needed to move quickly as the university only has six months to make the cuts and to notify students and their families of the fee hike.

The University of California Students Association, however, objects to the board voting on student fees during break.

"It is entirely inappropriate to schedule a meeting when students are no longer on campus," said UCSA chair Steven Klass, who spoke at the San Diego campus.

Several regents expressed their reluctance to raise student fees, though only the only regents to vote against the increase were George Marcus, Ward Connerly, student regent Dexter Ligot-Gordon and Lt. Gov. Cruz Bustamante, a regent by virtue of his office.

Bustamante and Connerly, who are rarely on the same side of an issue, agreed the increase places too many burdens on students and families.

"There is a substantial cost that is being borne again by the middle class and working class families," Bustamante said, noting that students in these families do not have access to the same aid resources as needy students.

Similarly, Connerly said it was unwise to raise fees during a recession, when job security is uncertain for many Californians.

"We could not pick a worse time to inflict this Christmas present," he said.

Regent Haim Saban, who left the meeting before the vote was taken, possibly represented a fifth vote against the increase.

Before leaving, he addressed Bustamante, who had spoken out against the fee increase, and said "I'm with you man."

Atkinson, along with regents John Davies and Alfredo Terrazas, who attended at UCSD and UCSF, respectively, characterized the fee hike as a way to spread the pain around different groups at the university.

Regent Norm Pattiz, who also voted for the measure, said the fee hike was the only solution under discussion that raised revenue.

University fees have historically increased when the economy is down, while remaining stable or even being reduced in more prosperous times. Several regents said it would be better for the UC to adopt a long-term fee policy rather than raise fees as a reaction to the state's budget woes.

The California Postsecondary Education Committee approved recommendations on a long-term fee policy on Dec. 3, that could become law if adopted by the legislature.

Regents finance committee chair Judith Hopkinson said after the meeting that though the committee has not examined CPEC's recommendations, the regents could form a long-term fee policy without legislative approval.

Davis will not release an official budget proposal for 2003-2004 until January, but he has already indicated intentions to further reduce the university's funding. Major cuts proposed by Davis include a 50 percent reduction for outreach.

Already, regents and university officials are expecting 2003-2004 to be a painful year. The budget plan approved by the regents in November called for a 6.5 percent student fee hike, unless the state can cover the costs, which is doubtful since California is expected to suffer a \$21 billion deficit that year.

The UC may be forced to consider major layoffs are cuts to the instructional budget, said Atkinson.

"We've got everything on the table," he said.

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12/19/02

To: Tova Lelah
From: Alvin Milder

Please confirm that you
have received all of
my comments: 44 pages
(3) + 13 attachments).

Thanks

310/472-6799
fax 310/472-5652

UCLA WATCH
134 Greenfield Avenue
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Tel: 310.472.6799, Fax: 310.472.5652

December 19, 2002

Richard C. Atkinson
President
University of California
Via Fax: (510)987-9074

UCLA
CHANCELLOR'S OFFICE
02 DEC 19 PM 5:17

Re UCLA's EIRs for (1) its 2002 Long Range Development Plan (the 2002 LRDP) and
(2) its Northwest Housing Infill Project (NHIP)

Dear Sir:

In your letter of December 4, in reply to my letter of November 27, you encouraged me "to continue working with [Chancellor Carnesale] and his staff" to address the community's concerns. It has been over two weeks since I received your letter, which showed a copy being sent to Chancellor Carnesale, and I have not had a response from anyone at UCLA. Unfortunately it is not possible to work with them if they will not give us the courtesy of a reply.

This issue is a much more important matter than the lack of manners by UCLA personnel. The proposals in the above referenced EIRs will have far reaching effects – the LRDP will add thousands of students to the campus and will last for at least ten years, and the NHIP will, among other things, add three massive buildings, each 9-stories in height, to an already over-crowded campus. These triple-towers will be built on the highest hill on the campus and will, of course, be eye-sores for decades.

The community needs your help. UCLA, consistent with its "neighbors and the environment be damned" approach, has once again violated the requirements of CEQA, the CEQA Guidelines, and the UC CEQA Handbook. UCLA has ignored its many commitments to consult with the community and "to pursue mutually acceptable resolution of the issues" [UCLA's 1990 LRDP, p.7], and it has breached its promise "to keep [me] fully informed and to learn about and respond to [our] concerns, along with those of other interested and affected constituents." [Letter from Chancellor Carnesale, April 6, 2000.]

N.B.: UCLA's refusal to discuss with the community our concerns about the gigantic triple-towers, which true to their names, will tower over the neighborhood, is a particularly egregious and odious breach of UCLA's promises and of the requirements of CEQA. And its review of only two alternatives in the NHIP DEIR shows its disdain for the environmental process.

The above referenced EIRs are for two distinct proposals – a program EIR for the LRDP and a project EIR for the NHIP, and it is unfair and unconscionable to require the community to do its duty as citizens in the minimal amount of time allowed by UCLA's bureaucrats. The DEIRs are in three volumes containing over a thousand pages and to read, review and prepare responses for each of the DEIRs in the time allotted is virtually impossible. Failure to grant the community sufficient time deprives the public of "a voice in the decision-making process – specifically, that public concerns about environmental issues and the potential effect of development on the physical environment are addressed prior to project approval." (UC CEQA Handbook: Chapter 4.1.)

Please grant the community sufficient review time so that it may have a meaningful voice in the decision-making process; as noted in the UC CEQA Handbook, at Chapters 4.1 and 4.2: "The public involvement process can enhance both the quality and credibility of the document, if conducted properly. It can also avoid costly project delays that result from political or bureaucratic processes. . . . In public involvement, it is the quality of the communication that is most important. **This generally consists of making a sincere effort to listen to and understand, community concerns, and to make every attempt possible to develop a creative solution that is acceptable to the community and meets the academic, program, and fiscal objectives of the campus. The establishment of project alternatives and mitigation measures, and seeking an acceptable middle ground is often the key aspect of this process.**" [Emphasis added.]

Again, please help; all the community is asking for is an opportunity to have a meaningful involvement in the process and to have UCLA honor its many promises regarding consultations with the community.

Sincerely,

Alvin Milder
Chair
UCLA Watch

cc:
Regents, University of California
Albert Carnesale, Chancellor UCLA
Honorable Gray Davis
Honorable Sheila Kuehl
Honorable Zev Yaroslavsky
Honorable Jack Weiss
Brentwood Glen Homeowners Association
Brentwood Homeowners Association
Friends of Westwood
Holmby-Westwood Property Owners Association
North Westwood Village Residents Association
Residents of Beverly Glen
Roscomare Valley Homeowners Association
Save the Village
Westside Community Planning Council
Westwood Homeowners Association
Westwood Hills Property Owners Association
Daily Bruin
Los Angeles Times

Response to Comment Letter I Ia

Letter from UCLA Watch (Alvin Milder), dated November 27, 2002

Response to Comment I Ia-1

This comment is identical to Comment 10-1. Refer to Response to Comment 10-1 and to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the adequacy of the public review period.

Response to Comment I Ia-2

This comment combines points raised in Comments 10-2 and 10-3. Refer to Responses to Comments 10-2 and 10-3 for a discussion of the adequacy of the public review period.

Response to Comment I Ia-3

The document referenced, "UCLA Capital Programs Overhaul Needed," neither contains a comment directed at the physical environmental effects of the 2002 LRDP, as analyzed in the 2002 LRDP Draft EIR, nor a comment on the adequacy of the 2002 LRDP Draft EIR as an informational document in accordance with the requirements of CEQA. This letter instead addresses previous construction and past events unrelated to the 2002 LRDP Draft EIR. Nonetheless, this document will be included in the administrative record for the 2002 LRDP.

Response to Comment I Ia-4

This comment combines points raised in Comments 10-4 and 10-5. Refer to Responses to Comments 10-4 and 10-5 for a discussion of the adequacy of the public review period.

UCLA WATCH

A Coalition of Homeowner Associations
and Neighbors of UCLA

310/472-6799 FAX: 310/472-5652

FACSIMILE COVER SHEET

DATE: December 19, 2002 PAGE: 1 OF 37
TO: UCLA Capital Programs, Attn: Tova Lelah
FACSIMILE NUMBER: 310-206-1510
FROM: Alvin Milder, Chair
MESSAGE: Re: (1) 2002 LRDP DEIR; and
(2) NHIP DEIR

The following comments regarding the above referenced DEIRs are supplemental to my comments at the hearing on these projects and my prior correspondence about the DEIRs.

These comments are submitted on behalf of UCLA Watch, a coalition of concerned citizens, students and community organizations representing thousands of UCLA's neighbors.

The DEIRs for these projects acknowledge that each project will have significant environmental impacts. Thus, under CEQA, the Regents, before the projects are approved, will have to make findings supported by substantial evidence in the record that all feasible mitigation measures have been adopted and that the benefits of each project outweigh the remaining significant adverse environmental impacts. The evidence does not support such findings.

In light of the serious adverse impacts these projects will have on the area, it is particularly important that the DEIRs fully analyze the potential impacts of the projects, as well as possible mitigation measures; and that the public be able to participate fully in the environmental

12-2

12-3

review process.

These DEIRs are deficient in many respects; they are, for example, very poorly written and are more confusing than informative, thus, failing to provide the public and the decision-makers with an adequate basis for review of the projects.

The deficiencies of the DEIRs include, without limitation:

- Failure to describe the projects adequately.
- Failure to inform the public and the Regents of the full extent of the impacts of the projects.
- Failure to discuss adequately the feasible alternatives.
- Failure to discuss adequately the cumulative impacts of the projects.

Because sufficient information concerning the environmental

consequences of the projects is not presented in an informative and understandable way, the DEIRs, and each of them, fail to fulfill CEQA's mandate that an EIR adequately inform the public and the decision makers about the potential impacts of the projects.

12-4

To fulfill CEQA's mandate that the public be fully informed, the DEIRs must be amended to include, inter alia, explanations and information regarding the following:

12-5

(a) What is the basis of the requirement that UCLA accommodate an increased enrollment of 4,000 FTE students through 2010-11?

(b) How many students (FTE and full time) have been assigned to the other UC campuses?

(c) What environmental documents

were prepared in connection with the decision (i) to assign an additional 4000 FTE students to UCLA? (ii) to assign students to the other campuses? (Please attach copies of all such documents to the DEIR for the LRDP.)

12-5

(d) What are the projected increases in the number of high school graduates for: 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010 and 2011?

12-6

(e) What will UCLA's projected enrollment be in 2012? 2015? [By FTE, by headcount?]

12-7

(f) What alternatives were considered before assigning UCLA an additional 4000 FTE students?

12-8

(g) As the 4000 additional FTE students were assigned to UCLA by the Regents, don't the Regents have a significant conflict of interest regarding

12-9

approval of these DEIRs?
(ii) If not, why not?

2. For the Fall quarter for 2002*:

(a) What is the total student enrollment?

(b) How many are:

(i) Undergraduates?

(ii) Graduate students?

(iii) Enrolled because they are in the top 12.5% of California's public high school grads?

(iv) U.S. citizens? Graduate students? Undergrads?

(v) Foreign: Grads? Undergrads?

(vi) Out of state: Grads? Undergrads?

(vii) Minorities: Grads? Undergrads?

(viii) On athletic scholarships?

*[Please provide the information by headcount & FTE.]

3. Please provide the same information requested in #2 above for the academic years of 2000/2001 and 2001/2002.

4. How are the other UC campuses handling their assigned increases?

12-9

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5. Of the freshman undergraduates entering in the below listed years, state (a) the total number enrolled in the fall quarter, (b) the percentage and total number that graduated in: (i) 4 yrs, (ii) 5 years, (iii) 4 years, (iv) more than 4 years. (Use headcounts.)

12-19

6. What is the average work load (units/quarter) of UCLA's undergrads?

12-20

7(a) What incentives does UCLA employ to encourage its undergrads to graduate in 4 years?

12-21

(b) What is the percentage of undergrads at UC Berkeley that graduate in 4 years?

12-22

(c) If UCLA was able to increase the number of its undergrads that finish in 4 years by 25%, how

12-23

much would the following
be reduced:

- (i) Traffic, e.g., vehicle-trips-per-day.
- (ii) Parking demand.
- (iii) Housing demand.
- (iv) Noise levels.
- (v) Air Pollution.
- (vi) Aesthetic degradation.
- (vii) Biological resources destruction.
- (viii) Hazards and hazardous materials.
- (ix) Water runoff.
- (x) Water usage.
- (xi) Wastewater and the need for wastewater conveyance systems.
- (xii) Demand for electricity.
- (xiii) Demand for natural gas.
- (xiv) Demand for state funds.

12-23

8(a) Does UCLA use off-campus centers for any of its undergrads or grad. student

- (i) In the Los Angeles area? (Where?)
 - (ii) Other places in the U.S.? (Where?)
 - (iii) abroad? (Where?)
- (Please specify the number of)

12-24

students, graduate and undergraduate, at each location.)

(b) Which other U.C. universities use off-campus centers for its students: graduate students? undergrads?

9. When the Tidal Wave II influx is over in about 2010, what will UCLA do with its excess capacity?

10. (a) How do the three new 9-story structures proposed in the NHIP DEIR "retain the human scale and rich landscape" of the campus?

(b) What will be the height of these 9-story buildings above Veteran Ave.?

(c) What steps are proposed to protect these Towers and the other massive structures on the campus from terrorist attacks? (See, e.g.,

"Rethinking National Security"
by Albert Carnesale.)

11(a) What are headcount and FTE numbers for each of the following periods: *

Fall 2001, Winter 2001-02, and Spring 2002 quarters; 2001-02 3-yr. avg; and the projections* for:

Fall 2010, Winter 2010-11, and Spring 2011 quarters; and 2010-11 3-yr. avg.

* Specify for undergraduates, graduate students, Academic employees and staff employees (including Health Center employees).

Also specify the Vehicle Trips per day for the same periods.

(b) How many of the students that attended the summer session in 2000 were also enrolled in the regular session for 2001-2002?

(c) What are the projections for 2010 regarding the no. of students that will be attending

both the summer and regular sessions?

(d)(i) What is the basis for the projections of significant (over 10%) increases in "Other Individuals" for the period 2000 to 2010?

(ii) How many summer-camp (and similar campus-uses) persons were on campus in the summer of 2000? How many are projected for the summer of 2010?

(iii) List all non-UCLA student events that utilized the dorms, or any parts thereof, during the calendar year 2000 and set forth the number of persons involved for each event.

(iv) Will the recreation facilities proposed in the NHIP DEIR be utilized for summer camps?

12. Please ^{explain} why 4000 additional FTE students:

- (a) Cause a growth of 2,135 students in the Regular Session (3-yr. avg) and an additional growth of 6,550 students in the summer session;
- (b) Cause an increase of (i) 805 Academic employees (for 2,135 students) in the Regular Session;
- (ii) 1,090 staff employees for 2,135 students; and
- (iii) 1,447 Other individuals

13. The LRPP states that the actual Summer Session student enrollment was 10,010 for 2000 and approximately 14,000 for 2001; what are the current projections, based upon the significant increase in 2001, for 2010?

14. What is the anticipated impact of the recently announced student fee increase for each of the

12-39

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academic years 2003-2011?

12-42

15. What is the anticipated enrollment growth (by headcount and FTE):

12-43

(a) In the College of Letters and Science; and

(b) Professional school programs?

12-44

16. What "flexibility" is required to accommodate implementation of the Southwest Campus Housing and Parking Project?

12-45

17(a) The DEIRs must be amended, to reflect the comments received and must then be recirculated.

12-46

(b) Both UC and CEQA guidelines require that the public be given an opportunity to review and comment on a draft EIR. This means time for a meaningful review. By lumping two distinct DEIRs together, a program DEIR and a project DEIR, and giving the public, faculty

12-47

and students a minimal amount of time to review and respond, UCLA has violated the basic provisions of CEQA. (And see my letter of November 27, 2002 to Richard C. Atkinson, President of the University, a copy of which is attached hereto and incorporated herein by this reference.)

(C) UCLA has been working on these DEIRs for about three years with an army of clerks and consultants; it is virtually impossible for a member of the public to study these three volumes - over a thousand pages - and to provide responses for the Regents' edification. (N.B.: The law never requires impossibilities. Civil Code § 3531.)

18(a) Further indication of UCLA's arrogant and cynical approach, is its refusal to respond to my

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letter of November 27, 2002 (referred to above); while Pres. Atkinson's December 4th response encourages me "to continue working with [Chancellor Carnesale] and his staff to address [my] concerns."

12-49

I have asked many times to meet with the Chancellor and/or his staff on the matters set forth in the DEIRs, only to be refused. This, in spite of the

many promises and pronouncements of UCLA's commitment to discuss these matters

12-50

with the community. See, e.g., the 1990 LRDP, the 2002 LRDP, the stipulated agreement and correspondence from Chancellors Young and Carnesale.

In fact, Chancellor Carnesale in a letter dated April 4, 2000, stated: "Be assured that I am dedicated to keeping our neighbors fully ^{informed} about our plans [for the addition of 4000 FTE students]...

12-51

we intend to keep you fully informed and to learn about

and respond to your concerns, along with those of other interested and affected constituents." This same letter states: "... adding 4,000 FTEs will not require that we add 4,000 student bodies. In fact, our planning is designed to identify and promote methodologies that would limit headcount growth. We are emphasizing an increase in Summer Session enrollments and students' unit loads to ensure the lowest possible growth in regular session enrollments and the smallest possible impact on the campus and surrounding community."

12-51

(b) What methodologies were used to limit headcount growth?

12-52

(c) What emphasis has been placed on "students' unit loads"? (ii) How has this emphasis manifested itself?

12-53

(d) Why does UCLA continue to refuse to meet with the community to discuss the DEIRs.

12-54

19. Consideration of these DEIRs should be postponed:

(a) Until the University fulfills its commitments to the public to meet and discuss the DEIRs.

12-55

(b) Until the California Supreme Court has ruled on the CEQA issues before it, which could have a significant impact on matters set forth in the DEIRs.

12-56

(c) At the least, until the DEIRs are amended and recirculated

12-57

(d) If the Regents approve the DEIRs before the above (19a,b,c) have been completed, it will be another indication that the DEIRs and the deliberations are merely post hoc rationalizations

12-58

of decisions already made.
I.e., approval of the proposals
set forth in the DEIRs; because,
as UCLA has stated, the Regents
have mandated the additional
4000 FTE students at UCLA.
(See also 35(c) and (d) infra.)

20(a) What methods are the other
UC campuses using to
accommodate the additional
FTE students assigned to
them

(b) List each UC campus and
the number of FTE students
added because of Tidal
Wave II (by campus).

(c) Why wasn't the semester
system evaluated as
an alternative?

(f) Why wasn't the Summer Session
used for all of the FTE students?

(ii) If it was, would the triple-towers
in the NITIP still be necessary?

(iii) If the answer to 20(f)(ii) is yes,
explain why.

12-58

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21. (a) What expanded undergraduate programs will be required to accommodate the growth of 4,000 FTE students?
(b) Where will they be located?

12-65

22. If the projected on-campus growth for the period 2001-02 to 2010-11 is an increase of 4,873 (from 56,468 to 61,341) (i.e., an increase of 8.599%), what is the basis for UCLA's claim that its growth projection is far below the growth projections for Westwood?

12-66

23. (a) On what basis do UCLA's bureaucrats maintain, for a program (the LRDP) that will cover 10 years (and will have a much longer impact), a growth of thousands, and thousands of square feet of development, that there are only 3 reasonable alternatives?

12-67

(b) Describe all other alternatives UCLA reviewed but chose not to

12-68

include.

24. The NHIP DEIR raises the same questions as set forth in no. 23 regarding the LRDP:

(a) How does a project that proposes three 9-story buildings to be constructed on the tallest hill on UCLA's campus, and which will be there forever or until the next earthquake or other disaster, have only 2 reasonable alternatives?

(b) Describe all other alternatives for the components of the NHIP (e.g., each tower (Hedrick North, Rieber North, and Rieber West), the new recreation facilities, the parking structure, and the Facilities Management storage building (the "shed")) that were reviewed by UCLA, but that were rejected as not being "reasonable" alternatives. [All references to "UCLA" in my comments refer to

and include UCLA's staff and consultants (including, without limitation, environmental and legal consultants).

25. N.B. : (a) UCLA has not discussed the "shed" with the community; in fact, it fails to discuss it in the Project description (§2.1, p. 2-1) or the Summary. UCLA's failure is a violation of CEQA, CEQA Guidelines, and the UCCCEQA Handbook.

(b) UCLA's treatment of the "shed" and recreation facilities are in breach of the stipulated Agreement.

26. (a) Was the "2001 Student Housing Master Plan (2001 SHMP)" approved in accordance with CEQA?

(b) If not, why not?

(c) Please amend the NHIP DEIR to include the 2001 SHMP and recirculate the DEIR.

(d) What is the 2002 SHMP referred to in §4.3.1 of the NHIP DEIR?

- 27(a) What does UCLA consider is the most efficient use of land resources?
- (b) Is open space an efficient use?
- (c) Is low density an efficient use?
- (d) High density?

12-75

- 28(a) What are the constraints on available funding sources?
- (b) What is the projected impact of the huge state budget deficit on:
- (i) UCLA's enrollment?
 - (ii) UCLA's ability to fund construction?
 - (iii) UCLA's ability to attract sufficient staff and faculty for additional students?

12-76

29. What is the height (in feet) of:
- (a) Rieber Hall North,
 - (c) Rieber Hall West,
 - (d) Hedrick Hall North,
 - (e) Hedrick Hall,
 - (f) Rieber Hall,

12-77

- (g) UCLA's new Hospital,
(h) Bunche Hall?

12-77

30. What is the ht. above sea level
of:

12-78

- (a) The base of each building
listed in no. 29 above,
(b) Lot 32?

31. How does UCLA's proposal
to build Hedrick Hall North,
Rieber Halls North and West
(the "triple-towers") harmonize
with Chancellor Carnesale's
promise that the addition of
4000 FTE students will have
"the smallest impact on the
campus and surrounding
community." (Letter of April 4, 2000
from Chancellor Carnesale to
me.)

12-79

32. The NHIP DEIR must be amended
to include:

12-80

- (a) Responses to the comments
set forth herein; and
(b) A conceptual Site Plan, Fig. 3-3

12-81

that is readable. (see, e.g., Fig. 3-2. Figure 3-3 is mostly shades of gray that make almost impossible to read.)

33(a) There is no discussion of alternatives for:

- (i) The recreation facilities;
- (ii) The Shed;
- (iii) the parking facility.
- (iv) Off-campus housing.

(b) The DEIR must be amended to include a review of alternatives for the above (including, without limitation, a review of the use of VA land for parking).

34. While both DEIRs are confusing and frequently misleading, the NHP DEIR is particularly malignant; e.g.:

- (a) The primary visual characteristic from the Western perimeter looking east is not "the stand of trees on the hilly terrain," rather it is, unfortunately the buildings. And if UCLA's Capital Programs

gets its way, the primary visual characteristic will be more buildings.

12-85

(b) Figures 4.1-5, 4.1-6 and 4.1-9 must be corrected to show some semblance of reality. These figures currently make it appear as if the campuses has a lake to the West and to the North.

12-86

35. Even more disgraceful is UCLA's treatment of CEQA's alternatives requirement:

(a) As noted above, analyzing only two alternatives for a project this size is fatuous, and UCLA's dismissal of the Reduced Project Alternative and the Lot-32 Alternative defy common sense and sound environmental practices.

12-87

(b) The DEIR must be amended to include alternatives for the parking structure, the recreational facilities, the "shed," and a fuller analysis of the Reduced Project

12-88

Alternative and ^{the} Lot-32 Alternative

12-88

(c) What is the basis of UCLA's continual reference in the NHIP DEIR to the 2002 LRDP as if it was already approved? (See, e.g., pages 4-2, 4-3, 4-4, 4-5 ("the remaining approximate 1.7 million sq ft already approved under the 2002 LRDP would be constructed." Emphasis added.) See also pages 6-6, 6-8, 6-9, 6-10, 6-11, 6-12, 6-13, 6-14, 6-15, etc., etc.)

12-89

(d) As UCLA is treating the LRDP for 2002 approved - another rubber stamp from the Regents - it is apparent that this entire "CEQA process" is another charade and hoax by UCLA. Which is further evidenced by:
(i) UCLA's summary rejection of the Lot-32 site for the NHIP. In fact, during the process leading up to the 1990 LRDP it was generally acknowledged by UCLA's representatives

12-90

① That a student mediterranean style housing village would be the best use for the area; and
(2) that UCLA would not build anymore high-rise dorms. (The community was assured of this in 1983 at the time of the 1983 LRDP and in 1976 at the time of the building of the Hitch and Saxon dorms.) And with the earthquake and terrorists concerns of today it makes even more sense to eschew high-rise dorms.

12-90

(e) UCLA must have in its files the elaborate plans presented to the community, which showed the planned student village for the Southwest Area. The should be included in the EIR for the NHIP

12-91

(f) Dorms, even if they are high rise could be tied in with those currently being constructed in the Southwest zone.

(g) Even with the limited information provided in the DEIR, it is apparent

12-92

that the Lot-32 site is environmentally superior.
36(a) The discussion in the DEIR of the Lot 32^{site} does not even mention the most glaring defect of the NHIP - the fact that the triple towers, 9-stories each, would be constructed on the highest point on the campus - ugly, ugly, ugly - vs. Lot 32, which is significantly lower.

(b) The number of trees that would be removed would be significantly fewer than those removed under the NHIP.

(c) UCLA is disingenuous when it talks of the need to amend the 2002 LRDP to transfer gsf from the Northwest zone to the Southwest zone for the triple-towers. The 2002 LRDP reallocates the necessary square footage primarily from the Southwest zone.

(d) Further indication of UCLA's sleight-of-hand is its omissions in its inadequate section on Transportation for the Lot 32 site. UCLA does not mention that Lot 32 is very close to the 405 Freeway's Wilshire Blvd. exit and use of the Lot 32 site would significantly reduce traffic in the Westwood neighborhoods.

12-96

(e) In addition, UCLA could increase the size of the underground parking garage on Lot 32 and thereby reduce additional traffic on the northern part of the campus.

12-97

37. As UCLA has refused to grant the public sufficient time to read, review and prepare responses to these DEIRs, I am not able to comment on the many of the deficiencies of the documents.

12-98

38. If UCLA was sincerely concerned about the environment and fulfilling its duties under CEQA, the CEQA Guidelines and the UC CEQA Handbook it would have ensured that the public and UCLA's students, staff and faculty were given an opportunity to have a meaningful voice in the Regents' decision-making process on these DEIRs.

12-98

And if UCLA would honor its commitments, the community would have had an opportunity to discuss the proposals prior to the preparation of the DEIRs, but UCLA refused the community's requests and denied us the process that was due.

(Please include in the EIRs for these proposals all letters

12-95

attached hereto and my
previous correspondence
and please respond to
them in the EIR.

Please amend the DEIRs
in accordance with the
above comments and the
other comments you receive
and please send me a
copy of the re-circulated
documents.

12-99

12-100

Response to Comment Letter 12

Letter from UCLA Watch (Alvin Milder), dated December 19, 2002

Response to Comment 12-1

The introductory information presented in this comment is acknowledged. Refer to the responses to comments in Letters 10, 11, and 11a for discussions of environmental issues previously raised in those letters, and to the responses to comments in Letter T for discussions of environmental issues raised at the public hearing on November 20, 2002.

Response to Comment 12-2

Collectively, the 2002 LRDP and the NHIP constitute the proposed project or the “whole of the action” as referenced in Section 15378 of the *CEQA Guidelines*; accordingly, the environmental impacts resulting from implementation of the proposed project are analyzed by the University in a single EIR, presented in two volumes, as further discussed in Topical Response E (Opportunity to Submit Public Comments) and in the Introduction to the 2002 LRDP Draft EIR (both volumes).

The impacts identified by the 2002 LRDP Draft EIR are summarized in Table 2-1 (Summary of Environmental Effects and Mitigation Measures) of Volumes 1 and 2, and as noted by the comment, the 2002 LRDP Draft EIR identifies significant, unavoidable impacts associated with the 2002 LRDP. The comment’s recitation of the requirements of CEQA for the adoption of findings concerning the adequacy of the Final EIR, the adoption of mitigation measures, and a Statement of Overriding Considerations for significant and unavoidable environmental impacts is noted. As required by Sections 15090 through 15093 of the *CEQA Guidelines*, The Board of Regents is required to adopt written findings on these and other issues prior to certifying the Final EIR and approving the 2002 LRDP and NHIP. In the event that The Board of Regents makes such findings, they would be supported by substantial evidence, including but not limited to the Final EIR.

Response to Comment 12-3

Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation. The 2002 LRDP Draft EIR was prepared in full accordance with all substantive and procedural requirements for a legally adequate EIR, including, but not limited to, the requirements set forth in CEQA and the *CEQA Guidelines*. With respect to mitigation measures, and consistent with Section 15126.4 of the *CEQA Guidelines*, the 2002 LRDP Draft EIR describes all feasible mitigation measures that could minimize significant adverse impacts. The mitigation measures are fully enforceable and are consistent with all applicable requirements. Because this comment did not

identify the specific areas of analysis believed to be inadequate, no additional response is possible. It should be noted that under CEQA, a general response is sufficient when a comment is general in nature. See *ALARM v. City of Los Angeles*, 12 Cal. App.4th 1773 (1993).

Response to Comment 12-4

The 2002 LRDP Draft EIR was prepared in full accordance with all substantive and procedural requirements for a legally adequate EIR, including, but not limited to, the requirements set forth in CEQA, the *CEQA Guidelines*, and the *University of California CEQA Handbook*.

Chapter 3 (Project Description) of Volumes 1 and 2 of the 2002 LRDP Draft EIR describe, in detail, the characteristics of the 2002 LRDP and the NHIP component of the LRDP, respectively. Tables 2-1 (Summary of Environmental Effects and Mitigation Measures) (Volume 1, page 2-7; Volume 2, page 2-6) summarize the potential environmental effects anticipated to result from implementation of the 2002 LRDP, including the NHIP component. Full analysis and disclosure regarding each identified impact of the project—short-term, long-term, and cumulative—under each *CEQA Guidelines* Appendix G threshold is provided in the appropriate section, by environmental issue area, of Chapter 4 (Environmental Setting, Impacts, and Mitigation) of Volumes 1 and 2. Each impact analysis has been conducted pursuant to the applicable sections of CEQA, the *CEQA Guidelines*, and the *University of California CEQA Handbook*.

Chapters 6 of Volumes 1 and 2 of the 2002 LRDP Draft EIR present an alternatives analysis, pursuant to Sections 15126.6(a) and 15126.6(f) of the *CEQA Guidelines*, of a range of reasonable alternatives to the 2002 LRDP and the NHIP component necessary to permit a reasoned choice. Alternatives that were preliminarily considered but rejected as infeasible are also described in Volume 1 (pages 6-3 to 6-6) and Volume 2 (pages 6-2 to 6-5). Sufficient information regarding each alternative is provided to “allow meaningful evaluation, analysis, and comparison with the proposed project,” as required by Section 15126.6(d) of the *CEQA Guidelines*: each applicable impact threshold evaluated for the 2002 LRDP, including the NHIP component, is also evaluated for each alternative. Further, as recommended by Section 15126.6(d) of the *CEQA Guidelines*, Table 6-7 (Comparison of Alternatives to the Proposed Project) (Volume 1, page 6-51) and Table 6-1 (Comparison of Alternatives to the Proposed Project) (Volume 2, page 6-34) provide a matrix that compares the impacts, by issue area, of each of the alternatives to the 2002 LRDP (in Volume 1) and the NHIP component of the 2002 LRDP (in Volume 2). As required by Section 15126.6(e) of the *CEQA Guidelines*, the alternatives evaluated include a “No Project” alternative. Refer to Responses to Comments 12-67 and 12-68 for a discussion of the selection of project alternatives. With respect to mitigation measures, and consistent with Section 15126.4 of the *CEQA Guidelines*, the 2002 LRDP Draft EIR describes all feasible mitigation measures that

could minimize significant adverse impacts. The mitigation measures proposed to reduce identified impacts are feasible, fully enforceable and are consistent with all applicable requirements, including proportionality. All mitigation measures—as well as 2002 LRDP programs, practices, and procedures—are included in Volumes 1 (page 2-7) and Volume 2 (page 2-6), Table 2-1 (Summary of Environmental Effects and Mitigation Measures), as well as in the appropriate environmental issue area sections of Chapters 4 (Environmental Setting, Impacts, and Mitigation) (Volumes 1 and 2).

Response to Comment 12-5

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of enrollment growth at UCLA and throughout the University of California system. All of the documents referenced in Topical Response C and prepared by, or on behalf of, the University can be accessed via the Internet at <http://www.ucop.edu/planning/lrenroll.html>.

Response to Comment 12-6

Please refer to Attachment A, which shows the increases in high school graduates projected by the California Department of Finance for 2003–11. This information was obtained from the California Department of Finance, and is available at <http://www.dof.ca.gov/html/demograp/k12g%2Dcp.htm>.

Response to Comment 12-7

The comment requests the projected enrollment of the years 2012 and 2015; however, those years are outside the scope of this EIR and are, therefore, speculative. The 2002 LRDP considers the existing and anticipated program space needs to address the academic, administrative, and support requirements associated with student enrollment and campus population growth anticipated through academic year 2010–11. As such, academic enrollment after 2011 is outside the scope of this 2002 LRDP Draft EIR and is considered speculative. No response is required.

Response to Comment 12-8

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of enrollment growth at UCLA and throughout the University of California system. In addition, refer to Chapter 6 (Alternatives) of the 2002 LRDP Draft EIR (Volume 1) for a discussion of project alternatives, as well as a comparison of the anticipated effects of these alternatives with the anticipated effects of the proposed project.

Attachment A:

California Public High School Graduate Projections 1986-2011

Year	Graduates
1986	237414
1987	249518
1988	244629
1989	236291
1990	234164
1991	244594
1992	249320
1993	253083
1994	255200
1995	259071
1996	269071
1997	282432
1998	298602
1999	309108
2000	318299
2001	324494
2002	332246
2003*	335255*
2004*	343699*
2005*	358667*
2006*	368734*
2007*	391179*
2008*	390607*
2009*	387360*
2010*	391006*
2011*	393728*

* Projected

Response to Comment 12-9

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of the allocation of enrollment growth throughout the University of California system. As discussed in this topical, the proposed increase of 4,000 FTE would not be "assigned" to the UCLA campus by the University of California unless and until The Board or Regents certifies the 2002 LRDP Final EIR and approves the 2002 LRDP. Under CEQA, where a public agency is carrying out a project subject to CEQA, such as the present case where the University of California has proposed to implement the 2002 LRDP for the UCLA campus, that public agency is required to serve as the lead agency under CEQA. See *CEQA Guidelines* Section 15051(a). This is an inherent part of CEQA and does not create a conflict of interest, as the University of California is required to follow the same CEQA process as any public agency approving a private project.

Response to Comment 12-10

During fall quarter 2002, the total headcount enrollment at UCLA was 35,363, while the total full-time-equivalent (FTE) student enrollment was 33,617. During fall quarter 2002, the undergraduate headcount enrollment at UCLA was 24,478 while the undergraduate FTE student enrollment was 22,878. During fall quarter 2002, the graduate student headcount enrollment at UCLA was 10,113, while the graduate student FTE student enrollment was 9,967.

Response to Comment 12-11

The University does not collect the class rank for its applicants or admitted students. Therefore this question cannot be answered precisely. Periodically, the University examines its eligibility requirements, and compares them to actual course histories, grades, and test scores for a sample of California high school graduates. Requirements are recalibrated if necessary to ensure that the top 12.5 percent of high school graduates for the state as a whole are eligible. To be eligible at the time of admission, applicants must meet the standards that were established during the last review of the eligibility requirements of the University.

Response to Comment 12-12

Fall 2002 headcount enrollment of domestic undergraduate students is provided in Attachment B1; headcount enrollment of domestic graduate students is provided in Attachment B2. FTE enrollment is not calculated or aggregated according to foreign/domestic status, and is not available.

Attachment B1

UCLA ETHNIC ENROLLMENT - UNDERGRADUATE

ACTUAL NUMBERS OF STUDENTS RESPONDING - Domestic Students Only (1)

	American Indian		Black/ African-Amer		Asian American (2)		Filipino		Chicano/ Mexican Amer		Latino/ Other Spanish		White/ Caucasian		Other		Decline To State		Total Domestic	Foreign	Total Enroll	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	#	#	
Fall 1973	130	0.7	1,319	6.7	2,006	10.2	Included in		845	4.3	230	1.2	13,968	71.2	87	0.4	1,026	5.2	19,611	529	20,140	Fall 1973
Fall 1974	136	0.7	1,144	5.6	2,144	10.6	Asian		742	3.7	298	1.5	14,104	69.4	64	0.3	1,689	8.3	20,321	585	20,906	Fall 1974
Fall 1975	116	0.5	1,073	5.1	2,252	10.6	146	0.7	767	3.6	339	1.6	15,044	71.1	129	0.6	1,305	6.2	21,171	599	21,770	Fall 1975
Fall 1976	89	0.4	1,045	5.2	2,403	12.0	163	0.8	806	4.0	359	1.8	14,094	70.2	220	1.1	891	4.4	20,070	547	20,617	Fall 1976
Fall 1977	98	0.5	1,111	5.8	2,545	12.9	191	1.0	824	4.2	404	2.1	13,925	70.7	36	0.2	561	2.8	19,695	498	20,193	Fall 1977
Fall 1978	83	0.4	1,011	5.2	2,619	13.3	218	1.1	827	4.2	444	2.3	13,872	70.7	107	0.5	438	2.2	19,619	570	20,189	Fall 1978
Fall 1979	82	0.4	998	4.9	2,966	14.6	250	1.2	832	4.1	480	2.4	14,234	69.9	76	0.4	441	2.2	20,359	723	21,082	Fall 1979
Fall 1980	73	0.3	925	4.4	3,062	14.4	308	1.5	773	3.6	453	2.1	13,341	62.8	31	0.1	2,268	10.7	21,234	770	22,004	Fall 1980
Fall 1981	60	0.3	1,101	5.1	3,451	15.9	396	1.8	826	3.8	534	2.5	13,913	64.1	224	1.0	1,215	5.6	21,720	889	22,609	Fall 1981
Fall 1982	93	0.4	1,146	5.2	3,776	17.0	524	2.4	880	4.0	577	2.6	14,123	63.7	316	1.4	734	3.3	22,169	764	22,933	Fall 1982
Fall 1983	106	0.5	1,294	5.8	4,052	18.1	605	2.7	1,022	4.6	703	3.1	13,721	61.2	341	1.5	569	2.5	22,413	721	23,134	Fall 1983
Fall 1984	116	0.5	1,303	5.9	3,973	17.9	731	3.3	1,202	5.4	775	3.5	13,240	59.7	369	1.7	468	2.1	22,177	716	22,893	Fall 1984
Fall 1985	136	0.6	1,423	6.4	3,915	17.5	852	3.8	1,448	6.5	884	4.0	12,910	57.8	400	1.8	355	1.6	22,323	578	22,901	Fall 1985
Fall 1986	155	0.7	1,544	6.9	4,003	18.0	889	4.0	1,677	7.5	1,022	4.6	12,225	55.0	329	1.5	381	1.7	22,225	526	22,751	Fall 1986
Fall 1987	175	0.8	1,580	6.9	4,235	18.4	963	4.2	1,901	8.3	1,203	5.2	12,156	52.9	281	1.2	478	2.1	22,972	529	23,501	Fall 1987
Fall 1988	203	0.9	1,659	7.1	4,444	19.1	954	4.1	2,111	9.1	1,323	5.7	11,904	51.2	221	0.9	448	1.9	23,267	556	23,823	Fall 1988
Fall 1989	232	1.0	1,678	7.1	4,931	20.8	918	3.9	2,326	9.8	1,389	5.9	11,568	48.8	169	0.7	488	2.1	23,699	585	24,284	Fall 1989
Fall 1990	244	1.0	1,587	6.7	5,724	24.1	886	3.7	2,436	10.3	1,352	5.7	10,888	45.9	110	0.5	520	2.2	23,747	460	24,207	Fall 1990
Fall 1991	269	1.1	1,462	6.1	6,445	27.0	906	3.8	2,535	10.6	1,327	5.6	10,276	43.1	67	0.3	580	2.4	23,867	501	24,368	Fall 1991
Fall 1992	260	1.1	1,424	6.1	6,697	28.9	877	3.8	2,554	11.0	1,232	5.3	9,272	40.0	66	0.3	797	3.4	23,179	470	23,649	Fall 1992
Fall 1993	252	1.1	1,369	6.1	7,201	32.1	877	3.9	2,524	11.3	1,157	5.2	8,371	37.4	77	0.3	575	2.6	22,403	489	22,892	Fall 1993
Fall 1994	250	1.1	1,396	6.1	7,950	34.5	934	4.1	2,666	11.6	1,141	5.0	8,136	35.3	129	0.6	433	1.9	23,035	584	23,619	Fall 1994
Fall 1995	255	1.1	1,433	6.2	8,031	34.7	1,038	4.5	2,816	12.2	1,193	5.1	7,857	33.9	144	0.6	401	1.7	23,168	601	23,769	Fall 1995
Fall 1996	231	1.0	1,437	6.2	8,000	34.4	1,016	4.4	2,922	12.6	1,122	4.8	7,903	34.0	161	0.7	483	2.1	23,275	639	23,914	Fall 1996
Fall 1997	203	0.9	1,407	6.0	7,938	34.1	1,075	4.6	2,834	12.2	1,112	4.8	8,011	34.4	170	0.7	520	2.2	23,270	655	23,925	Fall 1997
Fall 1998	176	0.7	1,306	5.6	7,871	33.5	1,116	4.8	2,670	11.4	1,066	4.5	7,895	33.6	286	1.2	1,092	4.7	23,478	625	24,103	Fall 1998
Fall 1999	147	0.6	1,167	4.9	8,043	33.4	1,095	4.6	2,590	10.8	1,015	4.2	8,327	34.6	417	1.7	1,247	5.2	24,048	620	24,668	Fall 1999
Fall 2000	130	0.5	1,068	4.4	8,237	33.9	1,054	4.3	2,541	10.5	958	3.9	8,481	34.9	494	2.0	1,350	5.6	24,313	698	25,011	Fall 2000
Fall 2001	120	0.5	948	3.9	8,435	34.3	1,061	4.3	2,585	10.5	960	3.9	8,565	34.8	549	2.2	1,379	5.6	24,602	726	25,328	Fall 2001
Fall 2002	115	0.5	921	3.8	8,435	34.9	1,019	4.2	2,660	11.0	973	4.0	8,267	34.2	578	2.4	1,230	5.1	24,198	701	24,899	Fall 2002

(1) Beginning in Fall 1990, "Domestic Students" includes: Citizens, Immigrants, Permanent Residents, Refugees, Undocumented Aliens, Amnesty Applicants, Approved petitioner for immigrant visa, Political Asylees, and blank visa codes. Prior to Fall 1990, "Domestic Students" included Citizens, Immigrants, Permanent Residents, Refugees and Undocumented Aliens.

(2) Asian includes Chinese, Japanese, Korean, Thai, Other Asian, East Indian/Pakistani, Pacific Islander and Vietnamese.

Attachment B2

UCLA ETHNIC ENROLLMENT - GRADUATE (State and Non-State Support) (1)

ACTUAL NUMBERS OF STUDENTS RESPONDING - Domestic Students Only (2)

	American Indian		Black/ African-Amer		Asian American (3)		Filipino		Chicano/ Mexican Amer		Latino/ Other Spanish		White/ Caucasian		Other		Decline To State		Total Domestic(4)	Foreign	Interns & Residents	Total Enroll	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	#	#	#	
Fall 1973	55	0.6	552	6.2	537	6.0	Included in Asian		387	4.3	114	1.3	6,663	74.5	40	0.4	591	6.6	8,939	850	1,297	11,086	Fall 1973
Fall 1974	47	0.5	493	5.3	552	6.0			389	4.2	114	1.2	6,420	69.3	27	0.3	1,227	13.2	9,269	928	1,301	11,498	Fall 1974
Fall 1975	46	0.5	520	5.5	503	5.3	0	0.0	405	4.3	126	1.3	6,853	72.0	106	1.1	965	10.1	9,524	1,013	1,423	11,960	Fall 1975
Fall 1976	51	0.5	480	5.2	552	5.9	21	0.2	385	4.1	146	1.6	6,771	72.8	123	1.3	768	8.3	9,297	1,006	1,522	11,825	Fall 1976
Fall 1977	47	0.5	421	4.7	565	6.3	23	0.3	385	4.3	148	1.7	6,452	72.1	26	0.3	883	9.9	8,950	1,015	1,595	11,560	Fall 1977
Fall 1978	47	0.5	410	4.7	559	6.4	26	0.3	376	4.3	138	1.6	6,250	72.0	47	0.5	830	9.6	8,683	1,221	1,650	11,554	Fall 1978
Fall 1979	39	0.4	422	4.7	628	7.0	32	0.4	361	4.0	170	1.9	6,214	69.6	27	0.3	1,035	11.6	8,928	1,290	1,677	11,895	Fall 1979
Fall 1980	32	0.4	415	4.6	645	7.2	30	0.3	342	3.8	159	1.8	5,658	63.0	6	0.1	1,695	18.9	8,982	1,295	1,745	12,022	Fall 1980
Fall 1981	37	0.4	360	4.1	638	7.2	24	0.3	315	3.6	164	1.9	5,304	60.0	36	0.4	1,969	22.3	8,847	1,449	1,704	12,000	Fall 1981
Fall 1982	40	0.5	407	4.8	752	8.8	28	0.3	375	4.4	159	1.9	5,425	63.4	23	0.3	1,346	15.7	8,555	1,395	1,685	11,635	Fall 1982
Fall 1983	48	0.6	388	4.6	813	9.6	28	0.3	380	4.5	165	1.9	5,285	62.1	29	0.3	1,377	16.2	8,513	1,402	1,705	11,620	Fall 1983
Fall 1984	53	0.6	374	4.4	842	9.8	35	0.4	365	4.2	169	2.0	5,291	61.6	27	0.3	1,435	16.7	8,591	1,361	1,658	11,610	Fall 1984
Fall 1985	51	0.6	340	4.0	909	10.7	42	0.5	360	4.2	178	2.1	5,580	65.5	59	0.7	995	11.7	8,514	1,331	1,632	11,477	Fall 1985
Fall 1986	43	0.5	347	4.0	927	10.7	51	0.6	382	4.4	196	2.3	5,547	64.1	68	0.8	1,094	12.6	8,655	1,396	1,621	11,672	Fall 1986
Fall 1987	48	0.5	367	4.2	965	11.0	70	0.8	367	4.2	223	2.5	5,801	66.0	85	1.0	861	9.8	8,787	1,546	1,601	11,934	Fall 1987
Fall 1988	40	0.5	409	4.7	1,069	12.3	91	1.0	389	4.5	242	2.8	5,797	66.5	80	0.9	605	6.9	8,722	1,558	1,567	11,847	Fall 1988
Fall 1989	44	0.5	450	5.0	1,152	12.9	98	1.1	399	4.5	265	3.0	5,852	65.4	87	1.0	605	6.8	8,952	1,520	1,574	12,046	Fall 1989
Fall 1990	43	0.5	466	5.1	1,209	13.3	115	1.3	421	4.6	286	3.2	5,743	63.3	84	0.9	704	7.8	9,071	1,478	1,576	12,125	Fall 1990
Fall 1991	47	0.5	471	5.2	1,318	14.6	126	1.4	430	4.8	293	3.3	5,545	61.5	92	1.0	680	7.6	9,002	1,359	1,579	11,940	Fall 1991
Fall 1992	62	0.7	474	5.4	1,259	14.3	130	1.5	450	5.1	272	3.1	5,274	59.8	104	1.2	790	9.0	8,815	1,294	1,581	11,690	Fall 1992
Fall 1993	69	0.8	465	5.3	1,413	16.2	138	1.6	502	5.7	260	3.0	5,243	60.0	123	1.4	520	6.0	8,733	1,241	1,581	11,555	Fall 1993
Fall 1994	67	0.8	538	6.1	1,617	18.3	150	1.7	534	6.0	298	3.4	5,081	57.6	216	2.4	327	3.7	8,828	1,086	1,577	11,491	Fall 1994
Fall 1995	60	0.7	508	6.2	1,634	19.8	140	1.7	508	6.2	292	3.5	4,597	55.7	240	2.9	276	3.3	8,255	1,047	1,642	10,944	Fall 1995
Fall 1996	71	0.8	518	5.9	1,770	20.0	162	1.8	547	6.2	302	3.4	4,919	56.6	238	2.7	327	3.7	8,854	1,148	1,677	11,679	Fall 1996
Fall 1997	72	0.8	454	5.2	1,784	20.6	142	1.6	523	6.0	300	3.5	4,781	55.2	271	3.1	328	3.8	8,655	1,312	1,666	11,633	Fall 1997
Fall 1998	61	0.7	439	5.0	1,901	21.9	158	1.8	491	5.6	319	3.7	4,732	54.4	292	3.4	304	3.5	8,697	1,305	1,691	11,693	Fall 1998
Fall 1999	41	0.5	412	4.8	1,890	21.9	164	1.9	502	5.8	308	3.6	4,586	53.3	287	3.3	421	4.9	8,611	1,396	1,676	11,683	Fall 1999
Fall 2000	45	0.5	405	4.7	1,839	21.4	171	2.0	475	5.5	330	3.8	4,476	52.1	347	4.0	503	5.9	8,591	1,608	1,680	11,879	Fall 2000
Fall 2001	48	0.5	386	4.4	1,822	20.9	191	2.2	479	5.5	342	3.9	4,546	52.1	386	4.4	529	6.1	8,729	1,750	1,687	12,166	Fall 2001
Fall 2002	46	0.5	406	4.4	1,916	20.7	198	2.1	524	5.7	393	4.2	4,699	50.7	507	5.5	571	6.2	9,260	1,753	1,687	12,700	Fall 2002

(1) Beginning in Fall 1996, Non-State Support programs include: Executive MBA, Fully-Employed MBA (FEMBA), GSEIS Leadership EdD, and Master of Public Health for Health Professionals (MPHHP).

(2) Beginning in Fall 1990, "Domestic Students" includes: Citizens, Immigrants, Permanent Residents, Refugees, Undocumented Aliens, Amnesty Applicants, Approved petitioner for immigrant visa, Political Asylees, and blank visa codes. Prior to Fall 1990, "Domestic Students" included Citizens, Immigrants, Permanent Residents, Refugees and Undocumented Aliens.

(3) Asian includes Chinese, Japanese, Korean, Thai, Other Asian, East Indian/Pakistani, Pacific Islander and Vietnamese.

(4) Includes JD, MD and DDS students; excludes interns and residents.

Response to Comment 12-13

Fall 2002 headcount enrollment of foreign undergraduate students is provided in Attachment B1; headcount enrollment of foreign graduate students is provided in Attachment B2. FTE enrollment is not calculated or aggregated according to foreign/domestic status, and is not available.

Response to Comment 12-14

According to the fall 2002 Student Profile (Attachment C), prepared by the Office of Analysis and Information Management, 921 undergraduates and 2,125 graduate students originated from outside of California at the time of admission. After admission, many students become residents; consequently, any such statistics after the first year would be confounded and not meaningful, and are not collected. No FTE numbers have been calculated, and the fall 2002 Student Profile has not yet been released.

Response to Comment 12-15

Fall 2002 headcount enrollment of minority undergraduate students is provided in Attachment B1; headcount enrollment of minority graduate students is provided in Attachment B2. FTE enrollment is not calculated or aggregated according to minority status, and is not available. Additionally, note that the information requested is provided by students on a voluntary basis, and many elect not to disclose such status.

Response to Comment 12-16

In academic year 2000-01, 363 [headcount] students were awarded athletic scholarships. These numbers are not yet available for the academic year 2001-02. FTE enrollment is not calculated or aggregated according to scholarship status, and is not available.

Response to Comment 12-17

Please refer to Attachments B1, B2, and C for this information.

Response to Comment 12-18

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of enrollment levels and their implications across the University system. In accordance with *CEQA Guidelines* Section 21080.09, all campuses of the University campuses that are considering plans to accommodate increased student enrollment will be preparing updates to their Long Range Development Plans and EIRs. Much like the LRDP update process currently being undertaken by UCLA, the other University of California campuses in their LRDPs and LRDP EIRs would articulate plans for, and address the environmental implications of, their proposed enrollment growth targets.

Attachment C

UCLA

HEADCOUNT ENROLLMENT BY CITIZENSHIP, FEE STATUS, AND GEOGRAPHIC ORIGIN Fall 2000, Fall 2001, and Fall 2002

	Fall 2000	Fall 2001	Fall 2002
Undergraduate	25,011	25,328	24,899
Domestic Students ¹			
Total	24,313	24,602	24,197
Citizen	20,175	20,629	20,520
Other Domestic	4,138	3,973	3,677
Resident Fee Status	23,206	23,491	23,086
Non-Resident Fee Status	1,107	1,111	1,111
Home Location at time of Admission ²			
In-State	23,385	23,672	23,276
Out-of-State	928	930	921
Foreign			
Total	698	726	702
Resident Fee Status	0	1	1
Non-Resident Fee Status	698	725	701

	Fall 2000	Fall 2001	Fall 2002
Graduate (including non-state support)	10,199	10,479	11,013
Domestic Students ¹			
Total	8,591	8,729	9,260
Citizen	7,784	7,957	8,439
Other Domestic	807	772	821
Resident Fee Status	7,839	7,965	8,341
Non-Resident Fee Status	752	764	919
Home Location at time of Admission ²			
In-State	6,644	6,788	7,135
Out-of-State	1,947	1,941	2,125
Foreign			
Total	1,608	1,750	1,753
Resident Fee Status	17	14	14
Non-Resident Fee Status	1,591	1,736	1,739

	1998-99	1999-00	2000-01
ATHLETIC SCHOLARSHIPS	402	411	363

¹Domestic students includes: citizens, immigrants, permanent residents, refugees, undocumented aliens, amnesty applicants, approved petitioner for immigrant visa, political asylees, and blank visa codes.

²Home location is the geographic location of the student's home at time of admission to UCLA.

Source: University of California Third Week Reporting Extract; SRORF058B-Enroll by Home Location; SRORF046A-Enroll Summary by Res. Visa Groups; IPEDS Graduation Rate Survey

Response to Comment 12-19

The comment did not list specific years to be analyzed with regard to enrollment and graduation rates. However, Attachment D lists the retention and graduation rates of freshmen students for fall quarters from 1981 through 2000.

Response to Comment 12-20

According to the UCLA Office of Analysis and Information Management, the 2001–02 three-quarter average (regular session) workload across all undergraduate students was 14.06 units per quarter.

Response to Comment 12-21

According to the UCLA Office of Analysis and Information Management, the following policies and actions employed by the campus appear to affect the time that students take to complete their degree:

1. Flat fees. UCLA students pay a flat fee that entitles them to take as many units as they can handle. They need special permission to enroll as part-time students, and not many students choose this option.
2. New minimum progress requirements. In 2001, the faculty imposed new minimum progress rules that start during the freshmen year and culminate with a requirement that seniors have taken 15 units per quarter, on average, over their academic career. For further information, see http://www.college.ucla.edu/up/regulations/min_prog_2001.html
3. Summer sessions used to be self supporting, and the tuition per unit exceeded the cost per unit during the academic year. The legislature has now funded summer instruction at UCLA, with the requirement that student tuition per unit be the same as during fall/winter/spring quarters. (All of UCLA's summer courses are in the regular academic catalog.) Summer enrollment for 2001 has shown a dramatic increase as a result of this funding, which tends to speed time to graduation.
4. Transfer students must have two full years of transferable credit, and in some departments must have fulfilled all or most of the lower division requirements. For more information, see http://www.admissions.ucla.edu/prospect/Adm_tr/tradms.htm

In addition, the University allows freshmen arriving with units from advanced placement classes, to bypass certain required courses at the University level, thereby speeding time to graduation. The University has noted an increase in students taking advantage of this program in recent years.

Response to Comment 12-22

Attachment E shows that the fourth year graduation rate has remained between 42 and 47 percent for full-time, first-year freshman for cohorts 1990 to 1997 at University of California, Berkeley. Refer to the following website:

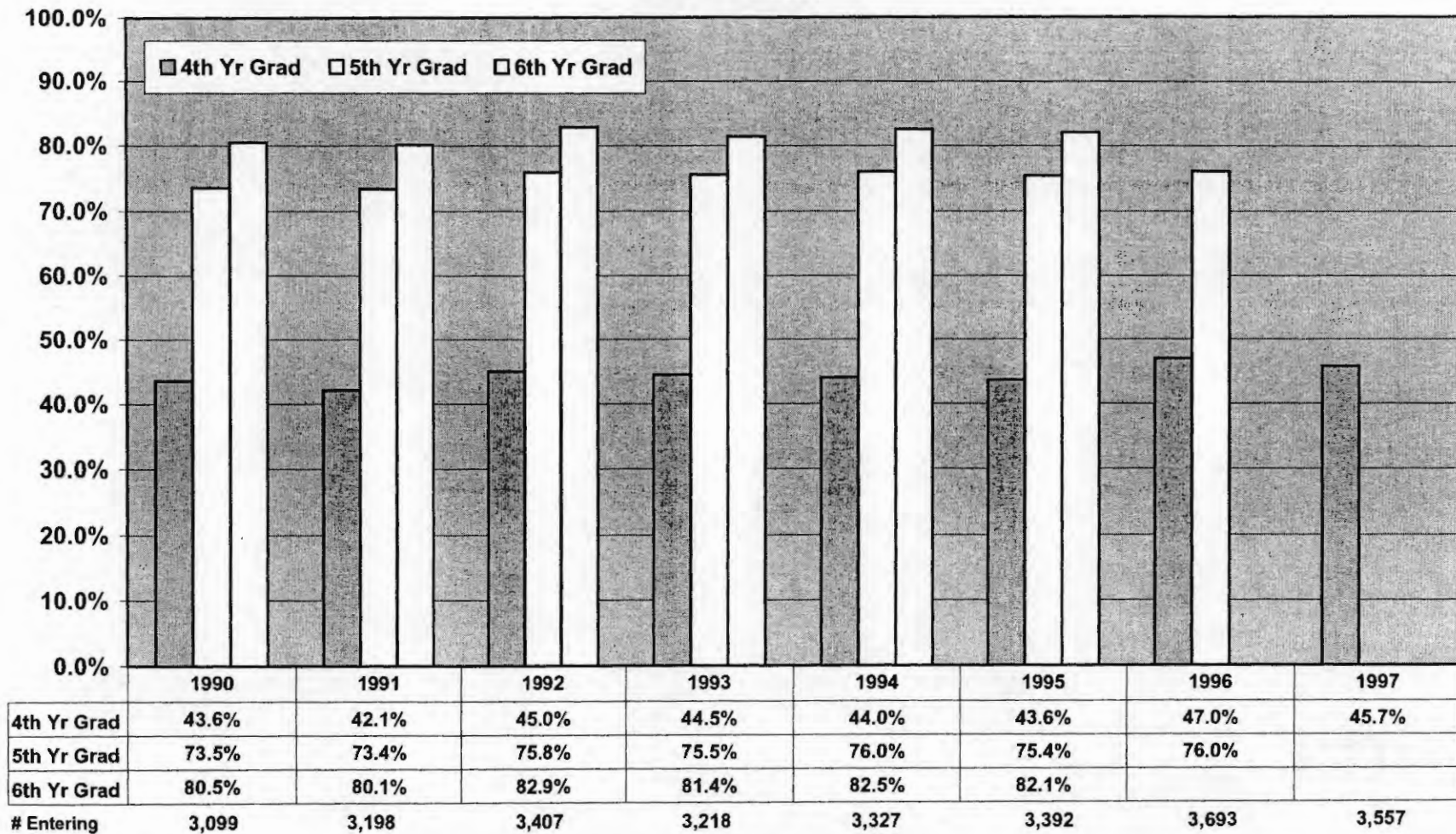
- <http://opa.vcbf.berkeley.edu/AnalysesAndReports/UCBGraduationDataAAUDE%2Ehtm>.

Attachment D

Quarter Students Entered	Cohort Size	Percent Enrolling at UCLA for the:					Percent Graduated:			by Fall 2001
		2nd yr.	3rd yr.	4th yr.	5th yr.	6th yr.	4 yrs	within 5 yrs.	6 yrs.	
ALL FRESHMEN										
Fall 81	4,349	85	76	71	44	9	26	59	65	69
Fall 82	4,072	90	79	73	47	9	25	61	68	71
Fall 83	3,819	89	81	77	50	12	24	61	70	73
Fall 84	3,895	90	81	77	52	11	24	64	72	75
Fall 85	3,994	91	82	78	52	11	26	65	72	76
Fall 86	3,940	92	84	81	55	11	26	68	73	79
Fall 87	4,438	92	86	82	53	10	29	71	78	81
Fall 88	3,788	94	86	83	49	9	33	73	79	82
Fall 89	4,022	94	87	94	47	8	37	74	80	83
Fall 90	3,555	94	88	85	49	9	35	73	79	82
Fall 91	3,922	94	89	85	47	9	39	75	81	84
Fall 92	3,412	94	88	84	46	8	38	74	79	82
Fall 93	3,387	94	88	85	46	9	39	75	81	83
Fall 94	4,124	94	89	86	45	7	40	76	81	82
Fall 95	3,701	95	90	87	43	7	44	78	82	82
Fall 96	3,819	95	89	87	41	7	46	79		79
Fall 97	3,906	96	91	88	37		52			52
Fall 98	4,195	97	90	88						
Fall 99	4,117	96	91							
Fall 00	4,196	97								

Attachment E

FOURTH, FIFTH AND SIXTH YEAR GRADUATION RATES BY COHORT YEAR UC BERKELEY



Methodology: Percentage of full-time, first-year freshman who graduated within 4, 5 and 6 years for cohorts 1990 to 1997.

Source: AAUDE Graduation and Retention Survey, 2001-2002.

Response to Comment 12-23

As described above in Response to Comment 12-21, the campus has worked continually to reduce the time to degree for undergraduate students. However, decreases in the time to graduation for undergraduates would not necessarily result in any reduction in enrollment, only in the time for which specific students would attend the school. The number of individuals on the campus would not, therefore, necessarily change, and impacts associated with campus population levels would remain the same, because demand for university education would continue to grow and would need to be met by the University to the extent allowed by the budgeted FTE student enrollment articulated in the 2002 LRDP. Therefore, impacts identified in the 2002 LRDP Draft EIR (Volumes 1 and 2) or listed in the comment would not necessarily differ due solely to a reduction in the time to degree for undergraduates.

Response to Comment 12-24

UCLA does use off-campus centers for its undergraduate and graduate students. Enrollment in these programs during fall 2002 was as follows:

- Local: 915 medical interns and residents (graduates) studied at other Los Angeles County hospitals
- Other US: 30 undergraduates studied in the UC in Washington DC program
- Abroad: 394 students participated in the Education Abroad program

In addition, numerous students, particularly graduate students, participate in other exchange programs and field studies at various locations throughout the world. Refer also to Response to Comment 12-25 for a discussion of other off-campus centers that enroll University of California students.

Response to Comment 12-25

Off-campus sites that enroll current University of California students include, but are not limited to, the following:

- Research facilities associated with the University of California Natural Reserve System
- Off-campus medical centers and other related facilities
- UCDC (the University of California Washington Center), a residential program in Washington, D.C.: 2001 enrollment was approximately 280 upper division undergraduates and 10 to 12 graduate assistants
- EAP (Education Abroad Program), a residential program: 2001 enrollment was 119 lower division undergrads, 2,713 upper division undergrads and 23 graduate students, for a total enrollment of 2,855 spread over approximately 140 countries

- White Mountain Research Station, which offers term-long “super courses” (e.g., environmental biology and geology), is a residential program. Students are upper division undergraduates drawn from all campuses except UCSF (which has no undergrads). The enrollment capacity is approximately 16 students per term.
- Bodega Marine Laboratory, a site managed by the University of California Davis (UC Davis), which offers upper division marine science research course work. The program is residential. Students are upper division undergraduates, and students from other campuses may enroll; however, only UCLA and UC Davis have sent students to the program to date. In fall 2000, 24 UCLA students spent the quarter there.
- UCSB Ventura Center, which serves as the satellite campus for UC Santa Barbara, the only one of its kind in the University of California system. Students are primarily upper division transfer and reentry students with a few graduate students. This is not a residential program. Students from other campuses may not enroll. Fall 2000 enrollment was approximately 110 undergraduates and 9 graduates.
- Applied Science Graduate Program at UC Davis-Livermore, a specialized graduate (PhD) program at the Lawrence Livermore National Laboratory for UC Davis Graduate students only, in the Department of Applied Science (DAS). This is not a residential program, and students commute with the aid of a dedicated shuttle to and from UC Davis. Depending on grant funding, approximately 75 to 100 students participate.

Response to Comment 12-26

A decrease in student FTE and increase or “excess” of capacity is not anticipated at this time. Campus activity beyond the 2002 LRDP planning horizon (2010–11) is considered speculative and is beyond the scope of this EIR.

Response to Comment 12-27

The residential structures proposed in the NHIP are intended to be compatible with the existing Hedrick Hall and Rieber Hall residential structures. As stated in the 2002 LRDP Draft EIR (Volume 2, pages 3-9 and 3-12), the proposed Hedrick Hall North would not exceed the height of the existing Hedrick Hall, and Rieber Hall North and Rieber Hall West would also not exceed the height of the existing Rieber Hall. As discussed in Impact NHIP 4.1-2 (Volume 2, page 4.1-13), the proposed residential structures would not substantially degrade the visual character or quality of the campus and the immediately surrounding area, and this impact would, as stated on page 4.1-17 of Volume 2, be less than significant.

Additionally, as described in the 2002 LRDP Draft EIR (Volume 2, pages 3-20 and 4.3-12), the NHIP includes, pursuant to 2002 LRDP EIR MM 4.3-1(c), a tree replacement plan, as well as a Landscape Plan to ensure that appropriate landscaping is provided in conjunction with development of the NHIP.

Response to Comment 12-28

Building heights are measured with respect to base and MSL, rather than their elevation relative to Veteran Avenue, which, according to the UCGS Beverly Hills 7.5-minute quadrangle, varies from about 520 feet MSL at Sunset Boulevard to about 300 feet MSL at Wilshire Boulevard. Heights of Northwest Housing Buildings (existing and proposed as requested), from base to roof, as well as elevations of the base, are

- Hedrick Hall—87 feet tall and Mean Sea Level (MSL) is 532 feet at the base of the structure (or 619 feet at the roof line)
- Hedrick Hall North—91.6 feet tall and MSL is 529 feet at the base of the structure (or 620 feet at the roof line)
- Rieber Hall—87 feet tall and MSL is 500 feet at the base of the structure (or 587 feet at the roof line)
- Rieber Hall North—91.6 feet tall and MSL is 507 feet at the base of the structure (or 598 feet at the roof line)
- Rieber Hall West—91.6 feet tall and MSL 506 feet at the base of the structure (or 597 feet at the roof line)

Response to Comment 12-29

The Campus has a Disaster/Emergency Response Plan to include safety procedures for both natural and man-made disaster events. The purpose of the plan is to (1) protect life, preserve University property, and resume normal activities; (2) establish organizational response structure; and (3) determine emergency response activation procedures. The Disaster Response Command Center team members include the Chancellor and campus leadership.

To further enhance campus security, the UCLA Environmental Health and Safety Department conducted a security audit for buildings containing high risk materials. Physical improvements have been made in response to this audit. For example, additional layers of security have been implemented which include new and/or additional alarms, new safety doors, locks, and security systems. Finally, the UCLA Hazardous Materials team has been trained specifically to respond to events related to biological agents.

The Housing and Residential Life program at UCLA provides a Safety, Security, and Emergency Response Plan. Key components of this program include the following: daily patrol of residential facilities by the UCLA Police Department and housing staff; controlled access to residential areas by residents, their guests, and housing staff only; and staffed 24-hour front desks located in principal structures. In addition, a Safety Education Committee is in place, which meets regularly to discuss and review safety issues and concerns. The committee consists of members from the Housing

Administration, UCLA Police Department, Men and Women's Resource Center, Environment, Health and Safety and the campus Fire Marshall.

Response to Comment 12-30

Headcount and FTE student enrollment and faculty/staff employment are not provided on a quarterly basis. Enrollment and employment figures are expressed in three-quarter averages. Refer to Attachments B1, B2, and C for three-quarter average headcount enrollment in fall 2001 and fall 2002. Refer also to Table 4.10-7 (Existing and Projected On-Campus Population—Regular Session) (Volume 1, page 4.10-9) for regular session headcount of enrolled students, academic employees, and staff employees, and average weekday populations for students and academic/staff employees and other individuals, during the baseline year and for 2010–11. Additionally, Table 4.10-9 (Projected Student Enrollment [On and Off Campus]) (Volume 1, page 4.10-11) provides three-quarter average headcount for undergraduate and graduate students in 2010–11.

Response to Comment 12-31

The traffic analysis in Table 4.13-13 (Current Vehicle Trip Generation—Regular Session) of the 2002 LRDP Draft EIR (Volume 1, pages 4.13-27 to 4.13-28) provided a breakdown of current vehicle trip generation for regular session based upon results of the fall 2001 cordon count (when campus activity and population is highest), and the current trip generation rates provided in Table 4.13-12 (Current Vehicle Trip Rates per Person) (Volume 1, page 4.13-27). As no cordon count is conducted in either the winter or spring quarters, no estimate or breakdown of trip generation is possible for either winter 2001–02 or spring 2002. However, winter and spring quarters are typically less than fall. The current vehicle trip rates for students in Table 4.13-12 is based upon the three-quarter average headcount for the 2001–02 academic year, thus Table 4.13-13 does provide trip generation estimates for the three quarter average student headcount population.

The estimate of future vehicle trip generation provided in Table 4.13-23 (Future Vehicle Trip Generation with 2002 LRDP—Regular Session) of the 2002 LRDP Draft EIR (Volume 1, page 4.13-40) is based upon the projected three-quarter average headcount of 36,445 students for the year 2010–11.

Response to Comment 12-32

Total headcount during the 2000 summer session was 10,010, of which 7,230 continued to attend UCLA in the fall.

Total headcount during the 2001 summer session was 13,966, of which 10,363 continued to attend UCLA in the fall.

Response to Comment 12-33

As shown in Table 4.10-9 (Projected Student Enrollment [On and Off Campus]) of the 2002 LRDP Draft EIR (Volume 1, page 4.10-11), the projected three-quarter average headcount during for the 2010–11 regular session is 37,360. The projected total enrolled headcount for the 2010 summer session is 16,560.

Response to Comment 12-34

As stated in the footnotes to Table 6 (Regular Session On-Campus Population) and Table 7 (Summer Session On-Campus Population) of the 2002 LRDP, the “Other Individuals” category represents “average weekday numbers of Medical Center clinical and associated faculty, patients, visitors, and volunteers; pre-school and elementary school children; other campus visitors and volunteers; vendors; and construction workers.” These individuals would be expected to increase with development on campus and with the growth in the campus population and expansion of existing programs.

Response to Comment 12-35

As shown in Volume 1, Table 4.10-8 (Existing and Projected On-Campus Population—Summer Session), the summer 2000 average daily population was 34,126 individuals. This number includes all students, academic employees, staff employees and other individuals. The “other individuals” category accounts for all summer camp and similar uses, such as medical center and cultural events visitors and other public programs.

Response to Comment 12-36

As shown in Volume 1, Table 4.10-8 (Existing and Projected On-Campus Population—Summer Session), the projected summer 2010 average daily population is 41,118 individuals. This number includes all students, academic employees, staff employees and other individuals. The “other individuals” category accounts for all summer camp and similar uses, such as medical center and cultural events visitors and other public programs.

Response to Comment 12-37

Any meeting or event that occurs at UCLA must meet the criteria set forth in UCLA Regulations on Activities, Registered Organizations and Use of Properties and UCLA Policy 860: Extracurricular Use of University Facilities. Under this Policy, University facilities may be made available for extracurricular purposes when such use is consistent with the mission of the University and when all conditions for such use are met (see http://www.adminvc.ucla.edu/appm/_entry_800.html).

It is likely that some of these meetings could be attended by UCLA students, faculty, and staff, in addition to members of the public. The number of persons involved in these meetings is tracked by several different campus departments for many different purposes; whether or not an attendee is a UCLA student is not documented. All conference attendees are included in the population projections for "other individuals" shown in Tables 6 and 7 of the 2002 LRDP and in Table 4.10-3 (Existing On-Campus Population—Regular Session) and Table 4.10-4 (Existing On-Campus Population—Summer Session) of the 2002 LRDP Draft EIR (Volume 1, page 4.10-4).

Response to Comment 12-38

Refer to the Response to Comment 9-2 for discussion of the status of the recreation component of the NHIP component of the 2002 LRDP.

Response to Comment 12-39

As discussed in Impact LRDP 4.10-1 of the 2002 LRDP EIR (Volume 1, pages 4.10-9 to 4.10-13), UCLA has been asked to plan for an increase of 4,000 full-time-equivalent (FTE) students above the level provided for in the 1990 LRDP headcount projections. To promote increased operating efficiency and space utilization, the State Legislature has encouraged campuses to accommodate much of the growth by expanding summer enrollment.

While this anticipated growth in student enrollment is described in budgetary terms of 4,000 FTE students, for physical, or LRDP planning purposes, it is the accommodation of student headcount growth that is considered for both the regular (fall, winter, and spring quarters), and summer sessions.

As stated on pages 4.10-9 through 4.10-10 of the 2002 LRDP Draft EIR (Volume 1), and also described in Response to Comment 12-20:

The term full-time-equivalent students, or FTE students, is a key budget and planning metric for the University of California. Enrollment projections are derived from the number of budgeted FTE students. Moreover, State funding to support enrollment growth of 4,000 FTE students at UCLA is provided on the basis of pre-established student FTE levels each academic year. The number of FTE students differs from the number of individual students (measured in terms of headcount) who are enrolled at the campus to take classes. Every 45 units of coursework taken by undergraduate students at UCLA during an academic year is equivalent to one FTE student, based on the concept of an entering freshman making orderly progress over four years toward a 180-unit degree. At the graduate level, 36 units of coursework is equivalent to one FTE, and in the health sciences every student headcount is considered to be one FTE.

If each student (undergraduate or graduate) took a full-time course load, student FTE would equal the student headcount enrollment. Student FTE is somewhat lower than the total student headcount, however, because students currently take slightly less than a full-time course load on average. For example, over the three-quarter regular session, undergraduate students currently average approximately 42 units, or about 93 percent of the defined full-time course load. This difference is compounded in the summer when enrollment consists primarily of undergraduate students who take

only a little more than eight units of course work on average, far below the 45 units that make up a full FTE. Thus, each headcount student currently attending summer session equals slightly less than one-fifth of an FTE on average. It is because of these differences between the defined full-time course (45 units) load and the actual number of units taken by students that causes student FTE to differ from student headcount enrollment.

As stated on page 3-9 of the of the 2002 LRDP Draft EIR (Volume 1):

...the UC was asked in 1999 to take additional students to meet the needs of California's growing population. For UCLA the request was framed in terms of a growth target of 4,000 FTE students to be added to UCLA's General Campus academic program. At that time, UCLA's planned General Campus three-quarter average regular session FTE target was 28,900 FTE; the Health Sciences regular session FTE level was approximately 3,719 FTE; and 1,210 FTE comprised the summer session. Thus with the proposed additional 4,000 FTE students, the total 2010-11 budgeted FTE target for the UCLA campus is 37,829 FTE students. The 37,829-student FTE budget target for 2010-11 is used to derive headcount projections for both the regular and summer sessions. Development of student headcount projections is subject to uncertainties that stem from difficulty in estimating future course loads that students will take and future State funding availability. For planning purposes, the LRDP headcount projections account for this uncertainty in order to ensure sufficient capacity to accommodate the growth in student enrollment and also to make certain that the potential environmental consequences of enrollment growth are adequately addressed. Therefore, the student headcount projections shown in Table 4.10-9 (Projected Student Enrollment [On and Off Campus]) of the 2002 LRDP EIR represent the highest headcount growth that is anticipated to occur in both the regular and summer sessions through academic year 2010-11. Actual headcount enrollment will most likely be lower than the estimates for both periods, and growth patterns could vary between the regular and summer sessions over the planning horizon. Enrollment growth in both the regular and summer sessions is also not anticipated to be greater than the 2010-11 total student FTE budget target...

As indicated by Table 4.10-7 of the 2002 LRDP Draft EIR (Volume 1, page 4.10-9), the on-campus population of students, academic employees, and staff employees would grow by approximately 7.4 percent during regular session over the 2002 LRDP planning horizon. However, summer session headcount growth for students and academic and staff employees is anticipated to increase approximately 31 percent over the same time period. The higher growth percentage for summer reflects the fact that summer sessions have traditionally had a much smaller enrollment compared to the regular session. This circumstance will change as the University encourages summer school attendance as a way of accommodating enrollment increases to make better use of existing facilities when campus activity is lower. Comparison of anticipated growth between regular and summer session shows that even with the larger percentage of student growth projected for the summer session, the overall campus population during summer would remain substantially below that of the regular session over the 2002 LRDP planning horizon.

In Table 4.10-9 of the 2002 LRDP Draft EIR (Volume 1, page 4.10-11), regular session headcount enrollment is presented as a three quarter average of students enrolled in the fall, winter, and spring quarters, whereas summer enrollment represents the total number of students that enroll in one or more

classes over the twelve-week summer session. Many of the students that attend summer session are also enrolled in the regular session. Consequently, it is not meaningful to combine the student headcount estimates for regular and summer sessions, as the sum of the two would double-count the students enrolled in both sessions.

Response to Comment 12-40

Refer to Response to Comment 12-39 for a discussion of the methodology for estimating the relationship between FTE and student headcount growth. The 2002 LRDP and 2002 LRDP Draft EIR estimates of academic employees take into account student headcount growth, departmental academic plans, average faculty teaching loads, and other factors, and also consider sabbaticals and leaves without pay. The number of staff employees was estimated to equal about 37 percent of the sum of enrolled students and faculty, based on historical evidence. "Other individuals" include visitors to various campus locations and programs. The 2002 LRDP and 2002 LRDP Draft EIR projections of other individuals were derived from visitor and participant counts during the 1999–2000 academic year, adjusted for planned changes and additions to current programs.

Response to Comment 12-41

Refer to the Response to Comment 12-33 for the projected total headcount enrollment for the 2010 summer session.

Response to Comment 12-42

Refer to the following webpage for a discussion regarding fee increases in spring 2003 and potential increases in the future: http://www.ucop.edu/news/factsheets/2002/student_fees.pdf

Note, however, that because direct effects of fee increases cannot accurately be predicted, the relationship between fee increases and enrollment is also speculative, and because no projects other than the NHIP are currently under consideration, impacts associated with campus population levels or with construction on an annual basis are speculative and cannot meaningfully be addressed at this time.

Response to Comment 12-43

The future growth for the campus is allocated to schools and colleges in terms of the workload that they would teach (FTE), not in terms of the number of majors that they would enroll (headcount). Current growth plans show a projected total workload in the College of Letters and Science in 2010–11 that would be equal to that taken by 23,340 full-time-equivalent (FTE) students. This workload is 1,526 FTE higher than 2001–02; and would be roughly equivalent to a growth of 1,617 students. Some of this workload increase would take place during the summer, but how much cannot be predicted at this time.

Response to Comment 12-44

Under the 2002 LRDP no expansion of professional programs in the health sciences, law, or management is anticipated. Growth is anticipated in the Graduate School of Education and Information Studies (GSEIS) and in the School of Engineering at both the undergraduate and graduate level.

The future growth for the campus is allocated to schools and colleges in terms of the workload that they would teach (FTE), not in terms of the number of majors that they would enroll (headcount). Current growth plans show a projected total workload in the School of Engineering in 2010–11 that would be equal to that taken by 2,800 full-time-equivalent (FTE) students. This workload is 171 FTE higher than 2001–02; and would be roughly equivalent to a growth of 173 students. Some of this workload increase would take place during the summer, but how much cannot be predicted at this time. Note that the headcount number of Engineering majors would be higher than the FTE student workload, because undergraduate engineering majors take many of their courses in the College of Letters and Science (L&S) and these courses are counted as L&S workload. The increased workload for the additional Engineering majors has been included in the L&S growth described in Response to Comment 12-43.

Current growth plans show a projected total workload in the GSEIS in 2010–11 that would be equal to that taken by 1,326 FTE students. This workload is 175 FTE higher than 2001–02; and would be roughly equivalent to a growth of 185 students. Some of this workload increase would take place during the summer, but how much cannot be predicted at this time.

Response to Comment 12-45

The comment is unclear. However, note that the Southwest Campus Housing Project, which is currently under construction, was previously evaluated in the UCLA Southwest Campus Housing & Parking Final EIR (SCH No. 2000051014) and is outside the scope of analysis of the 2002 LRDP Draft EIR.

Response to Comment 12-46

The comment states that the EIR must be amended to reflect the comments received and then recirculated. First, as part of the CEQA process, all comments on the 2002 LRDP Draft EIR, as well as all responses to these comments prepared by the University, will be included in the 2002 LRDP Final EIR for presentation to The Regents. See *CEQA Guidelines* Section 15132, which identifies the necessary contents of a final EIR. Although the 2002 LRDP Draft EIR will be amended in appropriate instances to reflect comments received, CEQA does not require a second round of public review and comment, (or recirculation) of the EIR simply on the basis that responses to comments have been completed. Under *CEQA Guidelines* Section 15088.5, recirculation of a draft EIR is only required when significant new

information is added to the EIR after public review but before certification of the Final EIR. New information added to an EIR is not "significant" for recirculation purposes unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. Under *CEQA Guidelines* Section 15088.5, "Significant new information" requiring recirculation include, for example, a disclosure showing that

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it
- (4) The draft EIR was "so fundamentally and basically inadequate and conclusory in nature" that meaningful public review and comment were precluded

Under *CEQA Guidelines* Section 15088.5(b), recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

As the responses to comments on the 2002 LRDP Draft EIR do not contain any new significant information or changes in the project which indicate the existence of a new and significant environmental impact not previously addressed (or a feasible mitigation measure or project alternative not adopted by the University), the University does not believe that any of the conditions requiring recirculation, as set forth in Section 15088.5 of the *CEQA Guidelines*, have been met; therefore, recirculation is not necessary.

Furthermore, the opinion of the commenter is unsubstantiated by the comment, as the commenter does not state which information in the comments could be construed as "new significant information." As a result, no additional response is possible. It should be noted that under CEQA, a general response is sufficient when a comment is general in nature. See *ALARM v. City of Los Angeles*, 12 Cal. App.4th 1773 (1993).

Response to Comment 12-47

Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation.

Response to Comment 12-48

The University received 370 public comment letters during the review period, three of which were from the commenter, indicating that ample opportunity for public comment was provided. Refer also to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation.

Response to Comment 12-49

As requested, the commenter's letter of November 27, 2002, has been included as Comment Letter 11a in this 2002 LRDP Final EIR, and all comments have been provided with responses. Refer to Responses to Comments 11a-1, 11a-2, 11a-3, and 11a-4 for responses to the issues raised in this letter.

Response to Comment 12-50

Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation, and Response to Comment 10-4 for a discussion of the University's continued practice of meeting with the community.

Response to Comment 12-51

As described in Responses to Comments 12-20 and 12-39, an increase of 4,000 full-time-equivalent (FTE) students would not result in the same increase in student population. Limiting regular session headcount growth by emphasizing an increase in summer session enrollment is one of the operational objectives provided in the 2002 LRDP Draft EIR (Volume 1, page 3-7). Specifically, this objective states that the 2002 LRDP would: "[a]ccommodate a proportion of enrollment growth by utilizing existing campus facilities more intensively during the summer, thereby minimizing capacity impacts to student services, housing, parking, and traffic, and limiting population growth in the regular session when campus activity is highest." In fact, Table 4.10-7 of the 2002 LRDP Draft EIR (Volume 1, page 4.10-9) indicates that the on-campus population of students, academic employees, and staff employees would grow by approximately 7.4 percent during regular session (over the 2002 LRDP planning horizon), while summer session headcount growth for students and academic and staff employees is anticipated to increase approximately 31 percent over the same time period. The higher growth percentage for summer reflects the fact that summer sessions have traditionally had a much smaller enrollment compared to the regular session. However, this circumstance will change as the University encourages summer school attendance as a way of accommodating enrollment increases to make better use of existing facilities when campus activity is lower. Comparison of anticipated growth between regular and

summer session shows that even with the larger percentage of student growth projected for the summer session, the overall campus population during summer would remain substantially below that of the regular session over the 2002 LRDP planning horizon

The 2002 LRDP Final EIR provides a response to all comments and concerns submitted on the 2002 LRDP Draft EIR. Refer also to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the adequacy of the public review period.

Response to Comment 12-52

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) and Responses to Comments 12-20, 12-39, and 12-51 for a discussion of the derivation of headcount projections for both the regular and summer sessions and the increased use of summer session enrollment to limit headcount growth in the regular session. Programs that may serve to limit headcount growth include, but are not necessarily limited to, the Education Abroad Program and off-campus assignments, such as the University of California Washington D.C. Center, the White Mountain Research Station, the Bodega Marine Laboratory, and other off-campus research and medical facilities.

Response to Comment 12-53

Refer to Response to Comment 12-21 for a discussion of student unit loads (e.g., encouraging undergraduate students to graduate in four years).

Response to Comment 12-54

Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation, and Response to Comment 10-4 for a discussion of the University's continued practice of meeting with the community.

Response to Comment 12-55

Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation.

Response to Comment 12-56

This comment asserts that the University should postpone consideration of the 2002 LRDP Draft EIR until "the California Supreme Court has ruled on the CEQA issues before it." The University is unaware of any issues before the California Supreme Court regarding the 2002 LRDP Draft EIR.

Response to Comment 12-57

The comment states that consideration of the EIRs should be delayed until they are revised and recirculated. Refer to Responses to Comments 8-11 and 12-46 for a discussion of the absence of a need under CEQA for recirculation of the 2002 LRDP Draft EIR.

Response to Comment 12-58

The 2002 LRDP Draft EIR has been prepared in full accordance with the substantive and procedural requirements of CEQA, and no decisions regarding project approval or disapproval have yet been made. Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of enrollment growth at UCLA and throughout the University of California system.

Response to Comment 12-59

This comment is acknowledged. As discussed in Topical Response C (Allocation of Enrollment Growth to the UCLA Campus), each University of California campus must prepare a Long Range Development Plan to address campus planning, development and enrollment issues during the planning period in question. The LRDP process (including the formation of strategies to accommodate growth), and the necessary CEQA review for the LRDP in accordance with Public Resources Code Section 21080.09, will be undertaken by each campus, and will be subject to public review and approval by The Board of Regents.

Response to Comment 12-60

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of the proposed FTE increase at UCLA and within the University of California system.

Response to Comment 12-61

A semester system was not evaluated as an alternative in the 2002 LRDP Draft EIR since it would not reduce the FTE or headcount population of enrolled students or academic/staff employees nor would it reduce the amount of remaining development allocation previously approved under the 1990 LRDP; therefore, environmental impacts would not be reduced. Without reducing the FTE or headcount population, or the overall development allocation, none of the environmental impacts of the 2002 LRDP would be avoided or substantially lessened. Section 15126.6 of the *CEQA Guidelines* states that "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project..." Therefore, a semester system alternative was not evaluated in the 2002 LRDP Draft EIR.

Response to Comment 12-62

The proposed enrollment increase for the summer session under the 2002 LRDP represents about 40 percent of the total growth in FTE. Accepting all FTE growth in the summer session was rejected by the campus as infeasible for several reasons. First, maintaining a full-time course load is difficult for instructional purposes because summer session course offerings are far fewer than during the regular session. Substantial increases in offerings are not feasible because the summer session is usually used by faculty for research. Additionally, higher sustained course loads by existing students to maintain a higher summer session FTE are not considered feasible because many students work full-time during the summer to earn tuition.

Additionally, further increases in summer session enrollment would exacerbate already significant and unavoidable impacts during summer, which are already projected to occur at more intersections during the summer session than during the regular session. As shown in Table 4.13-26 (Critical Movement Analysis Summary, Existing and Future Conditions—Summer Session) (Volume 1, page 4.13-59), thirty-three intersections would be significantly affected in the summer session by implementation of the 2002 LRDP. As shown in Table 4.13-24 (Critical Movement Analysis Summary, Existing and Future Conditions—Regular Session) (Volume 1, page 4.13-42), four intersections would be significantly impacted during the regular session.

Response to Comment 12-63

The NHIP would be necessary even under the scenario described above. As described in the 2002 LRDP Draft EIR (Volume 2, Section 3.1.1 [Program Description and Need for Project], pages 3-1 to 3-2), "UCLA currently has an unmet need of housing inventory for undergraduate students of approximately 733 beds, and it is anticipated that this demand will be increased to 2,229 beds by 2010–11." Additionally, as described on page 3-1 of Volume 2, many double-occupancy rooms have been converted to triple-occupancy rooms to meet continuing demand for on-campus housing; however, "this situation compromises the quality of the residential experience and places considerable strain on the residential facilities." Further, as described on the same page of Volume 2, a fundamental tenet underlying the 2001 Student Housing Master Plan (SHMP) is the desire of the campus to continue to transform UCLA into a residential campus, in order to accrue the environmental, academic, and social benefits associated with a student residential community, and the goals articulated in the 2001 SHMP included the following:

- On-campus housing will be guaranteed to all entering first-year students for a period of four years
- On-campus housing will be guaranteed to all new transfer students for a period of two years
- On-campus housing will be guaranteed to all single graduate students for a period of two years

- Off-campus, University-owned housing will be guaranteed for students with families as long as the student is making normal academic progress to degree

In addition, the 2001 SHMP seeks to increase the percentage of students housed in university-owned or private-sector housing (within walking distance to campus) to 58 percent by 2010–11.

Response to Comment 12-64

Refer to the Response to Comment 12-63 for a discussion of the purpose and need for the NHIP.

Response to Comment 12-65

As described in the 2002 LRDP (pages 27 to 28), “because most of the student enrollment growth would be at the undergraduate level, the programs centered in the College of Letters and Sciences (Humanities, Social Sciences, Life Sciences, and Physical Sciences) would need to accommodate the largest share of growth. It was also determined that undergraduate programs in the Arts and Architecture; and Theater, Film, and Television should grow to meet student demand, to meet changing technological needs, and because UCLA’s programs in these fields are among a small number currently available in California public higher education.” Additionally, State workforce and economic considerations would likely require growth in graduate professional teacher and principal training programs, graduate and undergraduate engineering and computer science programs, and social welfare doctorate programs. No expansion of professional programs in the health sciences, law, or management is anticipated.

Where facilities associated with these programs would be located has not been determined (other than the NHIP). However, new instructional and support facilities would be evaluated, pursuant to CEQA, as they are proposed.

Response to Comment 12-66

As discussed in Impact LRDP 4.10-1 of the 2002 LRDP Draft EIR (Volume 1, page 4.10-9 to 4.10-13), UCLA is acknowledged as part of the Westwood Community Plan Area in both the 1996 General Plan Framework and the 1996 General Plan Framework Final EIR (Framework). The Framework relied upon data from the 1990 U.S. Census, which is consistent with the data relied upon in the 1990 LRDP EIR and SCAG’s regional growth forecast as reflected in the Growth Management Chapter of the 1994 Regional Comprehensive Plan and Guide (RCPG). The Growth Management Chapter of the RCPG provides guidelines for development in relation to growth and land development issues. Included are employment, housing, and population forecasts for each subregion.

According to the Framework, the population in the City of Los Angeles was 3,485,399 persons in 1990, with an anticipated growth in population to 4,306,564 by the year 2010, which represents an overall

growth rate of 23.6 percent (approximately 1.2 percent per year). In the Westwood Community Plan Area, the Framework anticipated the growth rate to be approximately 20.1 percent between 1990 and 2010, or 1.0 percent per year, given a 1990 population of 41,297 and a projected 2010 population of 49,605. Given UCLA's anticipated population growth of approximately 12 percent between 1990 and 2010, or 0.6 percent per year, population growth at UCLA is well below the overall growth anticipated in the Westwood Community Plan area, as well as in the City of Los Angeles.

Response to Comment 12-67

As reflected in the 2002 LRDP Draft EIR (Volume 1, Chapter 6 [Alternatives]), the *CEQA Guidelines* requires that the range of alternatives addressed in an EIR should be governed by a rule of reason. Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (*CEQA Guidelines* Section 15126.6 [a]). When addressing feasibility, Section 15126.6 of the *CEQA Guidelines* states that the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries. The *CEQA Guidelines* state that the discussion of alternatives must focus on alternatives capable of either avoiding or substantially lessening any significant environmental effects of the project, even if the alternative would impede, to some degree, the attainment of the project objectives, which are identified in the 2002 LRDP Draft EIR (Volume 1, Section 3.3 [Objectives]), or would be more costly. The alternatives discussion should not consider alternatives whose implementation is remote or speculative, and the analysis need not be presented in the same level of detail as the assessment of the project.

Based on the *CEQA Guidelines*, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed project, (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project, (3) the ability of the alternatives to meet the objectives of the project, and (4) the feasibility of the alternatives. The analysis in 2002 LRDP Draft EIR indicates that the project will result in significant and unavoidable impacts with respect to operational traffic in both the regular and summer sessions, air quality operational emissions during the twelve-week summer session, and construction-related traffic, air quality, and noise (including on-campus construction-related groundborne vibration). Thus, the three project alternatives that were evaluated in detail represented alternatives that would minimize or avoid the significant traffic, noise, and/or air quality impacts associated with implementation of the project. In addition, during the scoping process, four other alternatives were also considered, but were found to be infeasible, as discussed in detail in the 2002 LRDP Draft EIR (Volume 1, Chapter 6 [Alternatives]).

The No Project Alternative (Continued Implementation of the 1990 LRDP through 2010–11) and the proposed project (2002 LRDP) effectively analyze the minimum and maximum development levels and population growth that could occur, and any additional alternatives, beyond those already analyzed, would result in environmental impacts that fall within this range. The comment also refers to “thousands and thousands of square feet of development.” The 1.7 million gross square feet envisioned under the 2002 LRDP was previously approved and analyzed under the 1990 LRDP, and the 2002 LRDP does not propose any additional development beyond that allowed under the 1990 LRDP. Therefore, it would neither be appropriate nor feasible to analyze an alternative that considers less than 1.7 million gross square feet of development previously approved under the 1990 LRDP.

Response to Comment 12-68

In addition to the three project alternatives that were evaluated in detail in the 2002 LRDP Draft EIR (Volume 1, Chapter 6 [Alternatives]), four other alternatives were also considered, but were found to be infeasible, as also discussed in Chapter 6 (Alternatives) of Volume 1.

Response to Comment 12-69

Refer to Response to Comment 12-67 for a discussion of the selection of project alternatives pursuant to the requirements of CEQA. The analysis in the 2002 LRDP Draft EIR (Volume 2, Chapter 6 [Alternatives]) indicates that the project will result in significant unavoidable impacts with respect to construction-related air quality, construction-related noise, construction-related traffic, and operational summer traffic. Thus, the two project alternatives that were examined in detail represented alternatives that would minimize the significant air quality, noise, and/or traffic impacts associated with implementation of the project. In addition, three other alternatives were also considered, but were found to be infeasible, as also discussed in Chapter 6 (Alternatives) of Volume 2. As discussed in the 2002 LRDP Draft EIR (Volume 2, pages 6-3 to 6-5), the NHIP alternatives rejected as infeasible included an extension of the NHIP construction schedule (to reduce construction-related air quality impacts, a reduced project (to allow a reduction in the height of the proposed structures), and increased housing (to eliminate or reduce operational traffic impacts).

Furthermore, the 2002 LRDP Draft EIR (Volume 2, Section 4.5 [Geology and Soils]) addresses geological impacts, including those attributable to seismic-related groundshaking, that could affect the NHIP. The document concludes that all seismic-related impacts would be less than significant with the incorporation of all relevant 2002 LRDP EIR PPs and compliance with the California Building Code.

Response to Comment 12-70

Refer to Responses to Comments 12-67 and 12-82 for a discussion of the selection of project alternatives pursuant to the requirements of CEQA, and Response to Comment 12-69 for a specific discussion of the alternatives evaluated for the NHIP.

Response to Comment 12-71

The campus has met a number of times with representatives of the Westwood Hills Property Owners Association to discuss the proposed Northwest Housing Infill Project as discussed in Topical Response E (Opportunity to Submit Public Comments) and Response to Comment 9-2.

Refer to Response to Comment 9-2 for a discussion of the status of the recreation and facilities management storage components of the NHIP and further CEQA review of the NHIP component of the 2002 LRDP.

Response to Comment 12-72

Refer to Response to Comment 9-2 for a discussion of the status of the recreation and facilities management storage components of the NHIP and further CEQA review of the NHIP component of the 2002 LRDP.

Response to Comment 12-73

The 2001 Student Housing Master Plan (SHMP), was a feasibility and planning study for possible future actions (i.e., an assessment of present and future student housing needs and a range of potential solutions that the University has not approved, adopted, or funded), and therefore meets the requirements for a statutory exemption under Section 15262 of the *CEQA Guidelines*.

Response to Comment 12-74

The 2001 SHMP was included as a reference in both volumes of the 2002 LRDP Draft EIR (Volume 1, page 8-7; Volume 2, page 8-8) and was cited extensively in relevant part throughout both documents. Refer particularly to Section 3.1.1 (Program Description and Need for Project) and Section 3.2 (Project Objectives) (Volume 2, pages 3-1 to 3-3).

The 2001 SHMP is a separate but related document to the 2002 LRDP Draft EIR, but includes no specific physical plans and would not be considered a component of the NHIP. The inclusion of the entire 2001 SHMP in the 2002 LRDP Draft EIR is therefore unnecessary for the purposes of evaluating the potential environmental effects of the NHIP. Further, the SHMP is a public document that is available for review and that has been incorporated in relevant part into the analyses in the 2002 LRDP Draft EIR (Volumes 1 and 2). The inclusion of additional information contained within the SHMP would

not constitute a change in the NHIP project or its environmental setting, and would not result in the determination of a new substantial environmental impact or a substantial increase in the severity of an identified impact. Additional information from the SHMP would also not constitute a new feasible alternative or mitigation measure, considerably different from those considered in the 2002 LRDP Draft EIR, that would clearly lessen the environmental impact associated with the NHIP. Therefore, inclusion of the entire SHMP in the 2002 LRDP Draft EIR, although unnecessary, would still not be considered new information under Section 15088.5 of the *CEQA Guidelines*, and would not require recirculation of the EIR. Refer also to the Response to Comment 12-46 for additional discussion of the requirements that trigger recirculation of an EIR.

Response to Comment 12-75

The reference to which the comment refers occurs on page 6-5 of the 2002 LRDP Draft EIR (Volume 2). This reference is a typographical error, and in response to this comment, the last sentence of the last paragraph on page 6-5 is hereby revised as follows:

...Not constructing the NHIP would substantially impede the University's ability to address the housing needs of the increase in student enrollment that would occur under the 2002 LRDP; meet the goals of guaranteeing housing goals articulated in the ~~2002~~2001 SHMP, including a reduction in triple-occupancy accommodations; and continue the progress made to date in transforming UCLA to a residential campus, it also would not achieve reductions in vehicle miles traveled, trip generation, or parking demand.

Evaluation of the efficiency of land use must be viewed in context of the entirety of campus spatial development. Considerations include, but are not limited to, the purpose of a particular land use proposal, aesthetics, compatibility with adjacent or surrounding uses, and the need for recreation and open space. The campus values open space as a necessary component of development that provides recreational opportunities, as well as physical separation and visual relief between buildings. Low-density development, while not allowing the same intensity of use of the same amount of space as high-density development, is a necessary means of providing a transition between uses of varying intensities. UCLA provides a range of uses, including residential and residential support, academic and research facilities, and recreational facilities, including open space, and these uses must be provided within the limited land resources available to the campus, and with consideration for proximity of some uses to others, and the relationship of perimeter uses to the adjacent communities. Consequently, no single development intensity would be appropriate across the entire campus, and less intense uses, such as open space, are a necessary and vital component of campus life.

Response to Comment 12-76

It is speculative to address the physical environmental impacts that might result at UCLA in response to state budget deficits or surpluses. Instead, the 2002 LRDP addresses the maximum physical development of the campus that could occur through the planning horizon of 2010–11. Therefore, constraints of available funding sources are irrelevant to addressing the physical environmental impacts of the proposed project.

Response to Comment 12-77

Refer to the Response to Comment 12-28 for the requested heights of the existing and proposed residence halls. Below are the other heights, as requested:

- Academic Health Center—144 feet tall, base at 355 feet MSL
- Bunche Hall—162 feet tall, base at 455 MSL
- Lot 32—base at 306 feet MSL

Response to Comment 12-78

Refer to the Responses to Comments 12-28 and 12-77 for the requested elevations.

Response to Comment 12-79

This comment is acknowledged. The NHIP is consistent with the effort of the campus to reduce traffic, air, and noise impacts by housing students on campus. The 2002 LRDP Draft EIR (Volume 2, pages 3-1 to 3-2) states, “[a]n important benefit of university-owned housing is the cohesive nature of the community formed by groups of students living in close proximity, as well as the associated environmental benefit of reducing vehicle trips to and from campus.” Indeed, one of the project objectives listed in Section 3.2 (Project Objectives) (Volume 2, page 3-2) is to “[r]educe the number of students who commute by increasing the number of students who reside on campus.” Trip reduction is essential to reduction of impacts on the campus and surrounding community associated with traffic, air, and noise. Refer to Responses to Comments 12-93 and 12-85 for a discussion of aesthetics analysis.

The 2002 LRDP Draft EIR (Volume 2) evaluates alternatives to the Northwest Housing Infill Project and examines the potential environmental impacts associated with each alternative. As stated in the 2002 LRDP Draft EIR (Volume 2, page 6-33), “...neither the No Project Alternative nor the Alternative Site would be environmentally superior to the proposed project, and neither project is fully consistent with the policies and goals of the 2002 LRDP, nor does either alternative meet the project objectives to the same degree as the proposed project.”

The comment does not identify particular impacts that should be addressed, nor is a copy of the referenced letter provided.

Response to Comment 12-80

As required by Section 15132 of the *CEQA Guidelines*, the 2002 LRDP Final EIR shall include the 2002 LRDP Draft EIR with revisions, comments, and recommendations received on the 2002 LRDP Draft EIR; a list of persons, organizations, and public agencies commenting on the 2002 LRDP Draft EIR; the responses of the University to significant environmental points raised in the review and consultation process; and any other information added by the University.

Response to Comment 12-81

The comment provides no recommendations for corrections to Figure 3-2 (Existing Conditions: Northwest Zone) (Volume 2, page 3-5), and the University believes that the figure is readily legible. Some revisions to Figure 3-3 (Conceptual Site Plan) (Volume 2, page 3-9) for greater legibility have been incorporated, and a revised figure is included in this Final EIR (Volume 3, Chapter II [Text Changes]). Refer to Response to Comment 9-2 for a discussion of the status of the recreation and facilities management storage components of the NHIP and further CEQA review of the NHIP component of the 2002 LRDP.

Response to Comment 12-82

The proposed NHIP consists of multiple components. The comment requests that the 2002 LRDP Draft EIR be amended so as to include alternatives for some of the various facets and components of the overall project. This is beyond the requirements of CEQA. The *CEQA Guidelines* require consideration of feasible alternatives to the project that would attain most of the basic objectives of the project. See *CEQA Guidelines* Section 15126.6.

The provision of parking, recreation facilities, housing, and the reconfiguration of the facilities management storage buildings are all components of the overall NHIP, the basic objective of which is to provide housing with appropriate amenities. CEQA does not require the requested analysis, but only requires the analysis of alternatives to the project as a whole. This requirement has been fulfilled by the examination of the No Project Alternative, where the NHIP is not constructed, and the Alternative Site Alternative, where 2,000 beds are constructed on Lot 32 in the Southwest zone.

Refer to Response to Comment 9-2 for a discussion of the status of the recreation and facilities management storage components of the NHIP and further CEQA review of the NHIP component of the 2002 LRDP.

Response to Comment 12-83

Refer to the Responses to Comments 12-70 and 12-82 for a discussion of the provision of alternatives to specific project components, rather than the project in its entirety.

Regarding the previous use by the campus of the Veterans Administration (VA) parking lot, student demand for off-campus parking is substantially less than on-campus parking, which is based upon past experience with the VA parking lots. Due to the distance from the main campus and the travel time required for a shuttle bus to travel between the VA parking lots and the main campus, these spaces were not attractive as an alternative parking location on campus. Furthermore, the campus's experience with the VA over the years has seen reluctance on the part of the VA to enter into long-term and/or permanent agreements for the use of their facilities.

Response to Comment 12-84

The 2002 LRDP Draft EIR describes the view illustrated by Figure 4.1-5 (View of Western Perimeter—Veteran Avenue [View 4]) (Volume 2, page 4.1-7). As shown in the figure, which is a visual simulation of the existing conditions along Veteran Avenue, looking east, the trees on the westernmost slopes of the Northwest Campus zone are a dominant visual feature. The text description acknowledges that “long-range views from this location include portions of Hedrick Hall,” and that mid-range views include “portions of Saxon Residential Suites,” which are generally obscured by trees.

Response to Comment 12-85

Impact NHIP 4.1-2 (Volume 2, pages 4.1-14 to 4.1-23) concluded that implementation of the NHIP would not substantially degrade the visual character or quality of the campus and the immediately surrounding area, and that a less-than-significant impact would occur. This determination was reached through examination of visual simulations prepared for the pre- and post-construction conditions at the proposed project site (Figures 4.1-6 to 4.1-8). These simulations depict the post-construction visual conditions observable of the project site from north, east, south, and west of the Northwest zone, and are directly comparable to existing conditions simulations (Figures 4.1-2 to 4.1-5) provided in the analysis. The determination reached in this analysis is, therefore, substantiated.

Response to Comment 12-86

Figure 4.1-5 (View of Western Perimeter—Veteran Avenue [View 4]) and Figure 4.1-6 (Post-Construction View of Northern Perimeter—Sunset Boulevard [View 1]) (Volume 2, pages 4.1-9 and 4.1-19) are computer-modeled visual simulations, and the model that generated the simulations did not have the precise topographic and textural detail necessary to render sidewalks, roadways, and houses adjacent to the campus. The graphical artifact of this textural and topographic absence yields the neutral

shades indicated by the comment. No implication of the presence of water or water features is intended. Note, however, that the rendering does not affect the ability of the simulations to accurately depict the components of the project as proposed, or the existing and proposed conditions at the project site.

Response to Comment 12-87

The comment is incorrect regarding his assertions that the analysis of project alternatives for the NHIP is inadequate under CEQA. Chapter 6 (Alternatives) of the 2002 LRDP Draft EIR (Volume 2), pursuant to *CEQA Guidelines* Section 15126.6(a), evaluates a range of reasonable alternatives to the proposed project, and thus satisfies CEQA requirements. As noted by the comment, Chapter 6 (Alternatives) of Volume 2 evaluates the No Project Alternative, the Reduced Project Alternative, and the Alternative Site (Parking Lot 32) under each threshold contained in Appendix G to the *CEQA Guidelines*. However, as discussed in Section 6.2 (Alternatives Rejected as Infeasible), other alternatives were also considered but rejected as infeasible prior to full analysis: these included the Extended Construction Period Alternative, the Reduced Project Alternative, and the Increased Housing Alternative. As required by Section 15126.6(a) of the *CEQA Guidelines*, the University disclosed its reasoning for selecting certain alternatives for full analysis, while rejecting further analysis of other alternatives due to their clear infeasibility. While the comment claims that the range of potential alternatives to the NHIP analyzed in the EIR is inadequate, the comment does not identify any other alternatives that the commenter believes the University should have analyzed. Under CEQA, the selection of a reasonable range of alternatives for analysis is driven by whether an alternative (1) offers substantial environmental advantages over the project proposal and (2) whether the alternative may feasibly be accomplished in a successful manner considering the economic, environmental, social, and technological factors involved. See, *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal.3d 553 (1990). As discussed in the EIR, the Extended Construction Period Alternative, the Reduced Project Alternative, and the Increased Housing Alternative do not result in substantial environmental advantages over the project in terms of reduction of construction impacts, and are not feasible in terms of satisfying the objectives of the project, which are primarily to increase the level of on-campus housing for undergraduate students, and to reduce the number of students commuting to campus. CEQA does not require the University to develop a series of additional "reduced project" alternatives when, as here, the alternatives analyzed in the draft EIR allow the public and the decision-maker to extrapolate the impacts of hypothetical alternatives with building square footage and population figures falling somewhere in between the alternatives presented for analysis. See *Village Laguna v. Board of Supervisors*, 134 Cal.App.3d 1022 (1982).

As described in Section 6.3.3 (Environmentally Superior Alternative), the No Project Alternative was determined to be the environmentally superior alternative, and consequently, as required by *CEQA*

Guidelines Section 15126.6(c)(2), another alternative was selected as the environmentally superior alternative. As discussed in the 2002 LRDP Draft EIR (Volume 2, page 6-33), although the Alternative Site Alternative would not result in fewer significant impacts than the proposed project, the Alternative Site Alternative could be considered the environmentally superior alternative. Table 6-1 (Comparison of Alternatives to the Proposed Project) (Volume 2, page 6-24) summarizes the alternatives analysis and shows a comparison of the severity of the significant impacts under each issue area for the No Project and Alternative Site Alternatives, and also shows the severity of the impact in an issue area with respect to the proposed project (greater, same, less). An examination of this table shows that the Alternative Site Alternative would potentially result in greater significant impacts compared to the proposed project, while those of the No Project Alternative would be less than those of the proposed project. Therefore, the alternatives analysis is based on a threshold-by-threshold comparison of the significant impacts of each alternative with respect to the proposed project, in accordance with the requirements of CEQA and the *CEQA Guidelines*. Additionally, the alternatives analysis noted that the Reduced Project Alternative, although rejected because it did not meet project objectives, could be considered environmentally superior to the Alternative Site Alternative, due to a marginal reduction in the degree of significant effects of the proposed project. It should be noted that The Board of Regents has not made a determination whether to approve the proposed NHIP project, or to reject any of the project alternatives in favor of the NHIP.

Response to Comment 12-88

The comment requests that alternatives be formulated with regard to individual components and facets of the overall project. As discussed in Response to Comment 12-82, the formulation of alternatives to project components is not required by CEQA. Refer also to Response to Comment 12-67 for a further discussion of alternatives selection.

With regard to the request for a more extensive analysis of the Reduced Project and "Lot 32" (i.e., Alternative Site) Alternatives, no further analysis is needed. The level required for an alternatives analysis is subject to a rule of reason. "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." See *CEQA Guidelines* Section 15126.6(d). Additionally, the alternatives analysis does not need to be as detailed as the impact analysis for the proposed project. See *CEQA Guidelines* Section 15126.6(d). California courts have endorsed this principle, noting that the discussion need not be exhaustive nor must it be as extensive as that contained in the impact analysis of the proposed project. See *Residents Ad Hoc Stadium Committee v. Board of Trustees of the California State University and Colleges*, 89 Cal. App. 3d 274, 287 (1979) ("The discussion of alternatives need not be exhaustive, and the requirement as to the discussion of

alternatives is subject to a construction of reasonableness.”). All that is required of an alternatives analysis is that it permit informed decision-making and public participation. See *Laurel Heights Improvement Association of San Francisco v. The Regents of the University of California*, 47 Cal. 3d 376, 406 (1988).

The discussion of the Reduced Project and Alternative Site Alternatives in Volume 2 of the 2002 LRDP Draft EIR contains descriptions of the character of each Alternative, and analyzes the impact of the Alternatives with regard to each of the impact areas analyzed in the EIR for the proposed project. Comparisons between the impacts of the Alternatives and the proposed project are made and summarized in a matrix at the end of the section. As a result, the consideration of the Reduced Project and Alternative Site Alternatives are adequate under CEQA.

Response to Comment 12-89

The NHIP, as a project under the 2002 LRDP program, proposes to develop 550,000 gsf of the 1.7 million remaining gsf of the growth allocation previously approved under the 1990 LRDP and proposed to be continued under the 2002 LRDP. However, the 1990 LRDP does not include sufficient remaining square footage in the Northwest zone; therefore, the revised development allocation for the Northwest zone in the 2002 LRDP is required in order for the NHIP to be implemented. Further, the NHIP is proposed as a component of the 2002 LRDP: adoption of the 2002 LRDP must therefore be assumed. As described in the 2002 LRDP Draft EIR (Volume 2, Section 1.3 [Type of EIR/Relationship to the 2002 LRDP EIR], pages 1-2 to 1-3), “the environmental analysis of the NHIP builds upon the broader programmatic analysis of environmental impacts resulting from implementation of the 2002 LRDP. If the 2002 LRDP Final EIR is not certified and the 2002 LRDP is not adopted, implementation of the NHIP would require an amendment to the 1990 LRDP, and additional environmental analysis would be required. Note that neither the 2002 LRDP nor the NHIP (a component of the 2002 LRDP) has been approved. Project approval requires a discretionary action by The Regents.

Response to Comment 12-90

The comment is incorrect regarding the nature of the rejection of the Alternative Site: the rejection was not “summary,” and a full analysis of the alternative is provided in the 2002 LRDP Draft EIR (Volume 2, Section 6.3.2 [Alternative 2—Alternative Site], pages 6-19 to 6-33). Further, the final decision regarding the Alternatives (including any decision to reject an alternative in favor of the project) must be made by The Regents. Refer also to Response to Comment 12-87 for a discussion of the comparison of the alternatives to the proposed project and the selection of the Environmentally Superior Alternative.

The 1990 LRDP did not preclude development of "high-rise dorms" referred to by the comment. Note that conditions and needs have changed since the adoption of the 1990 LRDP, as additional development has occurred and as greater enrollment than envisioned under the 1983 and 1990 LRDPs was projected for the campus, necessitating expanded academic programs and additional on-campus housing. During the planning process for the 1990 LRDP, the Southwest zone was designated to accommodate graduate student housing, and in fact a student housing project (the Southwest Campus Housing and Parking Project—a graduate student housing complex in a Mediterranean village style) was proposed and is now under construction in the Southwest zone. The alternatives analysis in the Southwest Campus Housing and Parking Project EIR (pages VII-34 to VII-42) determined that the Parking Lot 32 alternative location was not the environmentally superior alternative for that project.

With regard to earthquakes, the 2002 LRDP Draft EIR (Volume 2, Section 4.5 [Geology and Soils]) determined that less-than-significant impacts would occur with respect to potential geological and seismic hazards. Refer also to the Response to Comment 12-29 for a discussion of the measures taken on campus with respect emergency response in general, including but not limited to terrorist attacks.

Response to Comment 12-91

As stated above in Response to Comment 12-90, the Southwest Campus Housing and Parking project is a separate project that is not the subject of the 2002 LRDP and NHIP. The inclusion of plans for another project in the 2002 LRDP EIR would not inform the environmental analysis in the 2002 LRDP Draft EIR and is not required by CEQA.

The comment is unclear regarding the suggestion that the NHIP could be "tied in" to the Southwest Campus Housing and Parking project. Providing physical links between the two projects would involve additional construction and could result in increased environmental impacts. Further, the purpose of such a link is unclear, as the proposed NHIP is an undergraduate residential community that would be integrated into the existing undergraduate housing community in the Northwest zone, while the Southwest Campus Housing and Parking Project is a separate graduate student apartment complex.

Response to Comment 12-92

Refer to the Response to Comment 12-87 for a discussion regarding the alternatives analysis methodology and the determination of the environmentally superior alternative.

Response to Comment 12-93

Elevation is one of many factors considered in the determination of relative aesthetics effects of the project with respect to the Alternative Site; the relative effects of the alternative with the surroundings of the Parking Lot 32 site, compared to the effects of the NHIP upon the visual character of the site and

surrounding area, are other factors. As described in the 2002 LRDP Draft EIR (Volume 2, page 6-20), the impact of development on the Alternative Site upon the visual character of the site and surrounding area would be less than significant, as nine-story residential structures would be constructed on an existing parking lot, in the vicinity of existing high-rise development along Wilshire Boulevard. As described further in Response to Comment 12-85, the NHIP aesthetics analysis also determined, based on a comparison of visual simulations of pre- and post-construction view conditions, that the impact of the proposed project on the visual character of the project site and its immediate surroundings would also be less than significant, as the proposed structures would be substantially similar in size, massing, and architectural style to the existing Hedrick Hall and Rieber Hall residential structures, and that views of the structures from off campus and on campus would still be mostly obscured by existing mature vegetation, as depicted by Figures 4.1-6 to 4.1-9 (post-construction visual simulations) of the 2002 LRDP Draft EIR (Volume 2, pages 4.1-19 to 4.1-24). Because the levels of significance of the impacts of the two development scenarios with regard to the visual character of their respective sites would be the same, no substantial reduction in the severity of the impact would be achieved. Further, a reduction in the severity of one significant impact in one issue area does not necessarily render an alternative environmentally superior: such a determination must be made in light of a comparison of the effects of the project as a whole against the effects of the alternative with respect to other significant impacts. As described above in Response to Comment 12-85, the results of a threshold-by-threshold analysis of each alternative evaluated, along with a comparison of the severity of the impacts with respect to the proposed project, are summarized in Table 6-1 (Comparison of Alternatives to the Proposed Project) (Volume 2, page 6-34). As shown by the table, the Parking Lot 32 Alternative would result in the reduction of one significant impact (Construction Noise) to less than significant, and the in the reduction of one significant impact to a lesser degree of significance (Operational Traffic), but would result in three significant impacts that are more severe than the proposed project (Construction Traffic, Construction Air Quality, and Land Use). Consequently, as stated on page 6-33 of Volume 2, this alternative would not be considered environmentally superior to the proposed project.

Response to Comment 12-94

As stated in the 2002 LRDP Draft EIR (Volume 2, page 6-22), "the number of trees that would potentially be removed would be significantly fewer than those removed under the proposed project." However, as stated on page 6-22 of Volume 2, "both projects would have less-than-significant impacts after implementation of applicable 2002 LRDP MMs and following 2002 LRDP PPs."

Response to Comment 12-95

As described in Response to Comment 12-89, the NHIP is proposed as a project under the 2002 LRDP. The NHIP is, therefore, subject to the development allocation constraints and development concepts articulated in the 2002 LRDP. As stated in the 2002 LRDP Draft EIR (Volume 2, page 6-27), assuming adoption of the 2002 LRDP as proposed, an LRDP amendment would be necessary to reallocate the necessary square footage, rendering the Parking Lot 32 Alternative less consistent with the 2002 LRDP (which allocates the necessary square footage to the Northwest zone) than the NHIP as proposed. As noted in the comment, the campus could reallocate the 550,000 gross square feet to the Southwest zone; however, the reallocation of the necessary square footage to the Southwest zone does not in itself create the significant unavoidable impact cited in the alternatives analysis: the effects associated with the development of this square footage would create the impact, and as stated on page 6-27 of Volume 2, the potential land use incompatibility that would result from development (the placement of an undergraduate residential facility on a major commercial corridor) is what creates the significant unavoidable land use impact. Additionally, as described above, in Response to Comment 12-93, more severe significant unavoidable impacts have been identified under the Parking Lot 32 Alternative than under the proposed project; therefore, the Parking Lot 32 Alternative would not be environmentally superior to the proposed project.

Response to Comment 12-96

The University acknowledges that the Lot 32 site is closer to the I-405 Freeway than the proposed site of the NHIP. The suggestion that the utilization of this site would significantly reduce traffic in Westwood neighborhoods is not supported by any evidence. As noted in Table 4.13-14 (Future With Northwest Housing Infill Project Campus Trip Generation Rates—Regular Session) in the 2002 LRDP Draft EIR (Volume 2, pages 4.13-21 to 4.13-22) trip generation for an undergraduate resident student is approximately 0.186 trips per day, while an undergraduate commuter student generates approximately 1.041 trips per day. This would be true for any alternative location.

As discussed in the 2002 LRDP Draft EIR (Volume 2, page 4.13-34), the proposed NHIP includes a parking structure, which would provide a total of 299 spaces, of which 233 would be replacement spaces and 66 would be new spaces. Development of the proposed project at the Lot 32 site would result in the relocation of the vehicle trips associated with the 66 new spaces to an alternate location. The relocation of those trips could result in fewer vehicle trips on those streets that cross the residential neighborhoods (e.g., Montana and Veteran Avenues). However, given the relatively small number of trips generated by the 66 "new" spaces (at the Northwest campus location), the net effect of the developing the project at the Lot 32 site would be a minimal reduction in traffic. Thus, there is no evidence to support the

suggestion that this Alternative would “significantly reduce” traffic in Westwood neighborhoods. Further, relocation of the NHIP to the Lot 32 location would not alter the level of significance for traffic at the Wilshire Boulevard and Veteran Avenue intersection, which would operate at Level of Service “F” under proposed project conditions. Development of the NHIP at the Lot 32 site would shift the location of vehicle trips to the adjacent intersections, and could degrade traffic conditions at nearby intersections and the Wilshire Boulevard ramps to the I-405 freeway, and thus would not be environmentally superior to the proposed project.

Response to Comment 12-97

As noted in the Draft 2002 LRDP and 2002 LRDP Draft EIR, the campus will maintain the parking cap established in the 1990 LRDP at 25,169 spaces. As discussed in the 2002 LRDP Draft EIR (Volume 1, page 4.13-89):

UCLA currently maintains an on-campus parking space inventory of 22,330 spaces (including 1,310 stack spaces). Upon the completion of the Westwood Replacement Hospital, the Southwest Campus Housing and Parking, and the Intramural Field Parking Structure projects (which have been previously approved and/or are under construction and would add approximately 3,552 spaces), and the reduction of stack parking to approximately 597 spaces, the inventory would be maintained at or below the 25,169-space limit adopted in the 1990 LRDP. As required by PP 4.13-1(b), the parking space cap would be maintained under the 2002 LRDP.

Thus, the future amount of parking that could be provided on-campus is limited to approximately 597 physical spaces. (The LRDP traffic analysis assumed that the supply of on-campus parking would include up to 597 stack parking spaces, for a total on-campus inventory of 25,169 spaces.)

The Lot 32 Alternative for the NHIP indicated that construction of the housing complex on Lot 32 would require the provision of approximately 735 replacement spaces. Thus, this Alternative already assumed that a substantial reservoir of replacement parking would need to be provided. Provision of any additional parking would be limited by the LRDP parking cap of 25,169 spaces. With the proposed net increase of 66 spaces for the NHIP, the on-campus inventory of parking would be approximately 539 spaces below the parking cap. Thus, no more than 539 additional spaces could be constructed at the Lot 32 site. If 539 additional spaces were provided on the Lot 32 site (beyond replacement of existing space), vehicle trips would increase along those streets in proximity to the Lot 32 site, including those segments of Gayley and Veteran Avenues north of Wilshire Boulevard. To provide an additional 539 spaces at the Lot 32 site, the use of stack parking would be eliminated to remain under the parking cap. This would result in a reduction in vehicle trips at some locations, including Gayley Avenue (which provides access to both Structures 1 and 8, where stack parking is currently provided). However, reductions in vehicle trips (associated with the cessation of stack parking) would be partially offset by new vehicle trips on those streets in proximity to the Lot 32 site, including those segments of Gayley and

Veteran Avenues north of Wilshire Boulevard. Thus there is no evidence that the provision of a larger reservoir of parking on the Lot 32 site would substantively reduce traffic on the northern part of the campus. As noted in Section 6.3.3 (Environmentally Superior Alternative) of the 2002 LRDP Draft EIR (Volume 2, page 6-33), the Alternative (Lot 32) site would not be environmentally superior to the proposed project.

Response to Comment 12-98

The University has exceeded the requirements of CEQA with respect to both the length of the public review period and the number of public meetings held. Refer to Responses to Topical Response E (Opportunity to Submit Public Comments) for a further discussion of the public review period. Refer also to Responses to Comments 9-2 and 12-54 for a discussion of UCLA's ongoing practice of consultation with local community groups.

UCLA has and continues to demonstrate concern about the environment and fulfilling the requirements of CEQA as reflected in the *University of California CEQA Handbook*, as is evident by the numerous opportunities and vehicles for public comment that were provided to students, faculty, staff, and other interested parties. The Regents will consider the entirety of the comments provided in the 2002 LRDP Final EIR, including 370 written comment letters and the transcript of the public hearing held November 20, 2002.

This comment states that if UCLA would honor its commitments, the community would have had an opportunity to discuss the projects prior to preparation of the 2002 LRDP Draft EIR. The campus met with the community prior to the preparation of the 2002 LRDP Draft EIR. On April 6, 2002, the University held a four-hour scoping meeting on the UCLA campus, which was not required under CEQA. All accommodations were made to increase attendance, including provision of free parking. According to meeting notes from this April 6 scoping meeting, the commenter spoke eleven separate times, asking twenty-one questions and providing two additional comments. According to the meeting notes, all of the commenter's questions were answered at the meeting and both comments received response. In addition, on November 20, 2002, the University held a public hearing on the 2002 LRDP Draft EIR. Refer to Responses to Comments 9-2 and 10-2 for a detailed discussion of the meetings that were held by UCLA during preparation of the 2002 LRDP Draft EIR.

The 2002 LRDP Draft EIR was prepared in full accordance with all substantive and procedural requirements for a legally adequate EIR, including, but not limited to, the requirements set forth in CEQA and the *CEQA Guidelines*. Refer to Responses to Comments 12-67 and 12-68 for a discussion of the selection of project alternatives. With respect to mitigation measures, and consistent with Section

15126.4 of the *CEQA Guidelines*, the 2002 LRDP Draft EIR describes all feasible mitigation measures that could minimize significant adverse impacts. The mitigation measures are fully enforceable and are consistent with all applicable requirements.

Response to Comment 12-99

As required by Section 15132 of the *CEQA Guidelines*, the Final EIR for the 2002 LRDP, including the NHIP component, shall include the 2002 LRDP Draft EIR, as revised; comments and recommendations received on the 2002 LRDP Draft EIR; a list of persons, organizations, and public agencies commenting on the 2002 LRDP Draft EIR; the responses of the University to significant environmental points raised in the review and consultation process; and any other information added by the University.

The commenter included several documents as attachments to the comment letter. Where specifically referenced in a comment, these documents have been reviewed to provide context for a response. Where the attachments raise CEQA issues, they are repetitive and have already been covered in previous Response to Comments, including Response to Comment 12-1 through 12-100. Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation. Regarding the remaining items, it is unclear whether the documents in question contain a comment directed at the physical environmental effects of the 2002 LRDP, as analyzed in the 2002 LRDP Draft EIR, or is a comment on the adequacy of the 2002 LRDP Draft EIR as an informational document in accordance with the requirements of CEQA. While this document will be included in the administrative record for the 2002 LRDP, absent a specific comment on the content or adequacy of 2002 LRDP Draft EIR, it is impossible to prepare a response, and CEQA does not impose such a requirement.

Response to Comment 12-100

Refer to Response to Comment 8-11 for a discussion of the circumstances requiring recirculation of an EIR and why the 2002 LRDP Draft EIR is not required to be recirculated. As described in Responses to Comments 12-1 to 12-99, neither the comments nor the responses to the comments in this letter resulted in information that demonstrates that a new substantial environmental impact would result from the project or a mitigation measure, that a substantial increase in the severity of an environmental impact would occur that was not evaluated in the EIR, that a feasible alternative or mitigation measure that is considerably different from those in the EIR and that would considerably lessen an impact of the project, or that the EIR was so fundamentally and basically inadequate or the analysis so conclusory that public comment on the EIR was essentially meaningless.

Dr. Hans von Leden
259 TILDEN AVENUE
LOS ANGELES, CA 90049

November 25, 2002

UCLA Capital Programs
Attn: Environmental Planning
1060 Veteran Avenue
Los Angeles, CA 90095-1405

Gentlemen:

I have received the information about the increased enrollment at UCLA with surprise and concern. When I was a Professor at the Medical School in the 1960s, the limit was fixed at 30,000 students. Apparently, the latest recommendations call for more than twice that number.

13-1

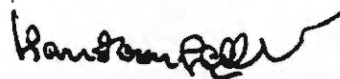
I can well understand why the University of California needs to increase its facilities with the increasing population in our state. That is why additional campuses have been created in various parts of California. UCLA is the only U.C. Campus in the middle of a city, and its overall size is limited by the surrounding commercial and residential areas. The concentration of traffic in the neighborhood is the highest in Los Angeles metropolitan area, and the campus has changed from a park-like atmosphere to a concrete jungle. The planned residential facilities for 2,000 additional students would choke the area even further.

13-2

While these concerns are surely not original to the writer of this letter, perhaps the pertinent authorities at the University of California would consider my comments as the expression of a "good neighbor".

13-3

Very truly yours,



Hans von Leden, MD

cc: Westwood Hills Property Owners Association

Response to Comment Letter 13

Letter from Hans von Leden, dated November 25, 2002

Response to Comment 13-1

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of the ability of existing capacity to accommodate additional enrollment levels.

Response to Comment 13-2

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of the allocation of enrollment across the University of California system. Note also that UCLA is not the only University of California campus located within a city: other University of California campuses that are also located within cities include Berkeley, San Francisco, Irvine, and Riverside.

Refer to the 2002 LRDP Draft EIR (Volume 2, Section 4.1 [Aesthetics]) for a discussion of the effects of the proposed NHIP on the visual character of the site and its surroundings. As summarized in Table 2-1 (Summary of Environmental Effects and Mitigation Measures) (Volume 2, pages 2-6 to 2-46), implementation of the proposed project would not result in any significant aesthetics impacts. The project would, however, result in significant and unavoidable construction traffic impacts, as well as impacts at intersections during the regular and summer sessions, as discussed in Section 4.13 (Transportation/Traffic) of Volumes 1 and 2 and summarized in Table 2-1 of each Volume.

Response to Comment 13-3

The comment is acknowledged.

PRESIDENT, STEVEN LUKASIK

BEL AIR BEVERLY CREST NEIGHBORHOOD COUNCIL

100 BEL AIR ROAD
LOS ANGELES, CA 90077

CONTACT TELEPHONE (818) 756-2040

FACSIMILE (818) 756-2041

PAMELA S. COOKE

FAX COVER SHEET

DATE : 12/20/02

SENT TO : Lelah Tovah-UCLA Environmental Planning

SENT BY : Steven Lukasik/ Pam Cooke

FAX NUMBER : (310) 206-1510

OUR FILE NO. : UCLA LRDP DRAFT EIR BABCNC

THE ORIGINAL x WILL WILL NOT FOLLOW BY U.S. MAIL

NOTE: THIS DOCUMENT CONTAINS 9 PAGES, INCLUDING THIS COVER SHEET. IF YOU DID NOT RECEIVE ALL THE PAGES, PLEASE CALL (818) 756-2040 AS SOON AS POSSIBLE.

COMMENTS

BEL AIR BEVERLY CREST NEIGHBORHOOD COUNCIL
100 BEL AIR ROAD
LOS ANGELES, CA 90077

December 20, 2002

Ms. Tova Lelah, Assistant Director
UCLA Capital Programs
1060 Veteran Avenue, Box 951365
Los Angeles, CA 90095-1365

Dear Responsible Agency and Board of Regents:

The Bel-Air/Beverly Crest Neighborhood Council hereby submits its response to the draft EIR for the 2002 Long Range Development Plan (LRDP) and Northwest Housing Infill Project.

The Bel-Air/Beverly Crest Neighborhood Council (BABCNC) is a Los Angeles City chartered authority, comprised of stakeholders which are located, or have an interest in the geographic area bordered on the West by the 405 freeway, and Laurel Canyon on the East, Mulholland Drive to the North and Sunset Boulevard to the South. This community has a direct interest in the development of UCLA and its impact on our stakeholders.

We offer the following comments and criticisms in an effort toward furthering the interests of our stakeholders and to assist UCLA in existing as a good neighbor and environmentally compliant entity.

1. Community Outreach and Justification for LRDP

The community was advised that the new LRDP was primarily a result of the Master Plan for Higher Education which Plan asked the University to plan for 4000 Full Time Equivalent Students. This objective was also stated in the Notice of Preparation. This statement is repeated in the Project Objectives of the Draft EIR. The Master Plan guarantees that 12.5 percent of the high school graduates will be able to attend California universities over the next decade.

The community applauds the goal of improving access to higher education for California high school graduates. The goal is admirable, however, the community does not feel that the impacts of this expansion on the community have not been adequately addressed and mitigation alternatives adequately analyzed.

When one reviews the actual numbers in the LRDP , Table 3, Draft EIR, table 3-5, one learns that the housing, which is a major part of the LRDP substantially benefits graduate students and not undergrads. In fact, the 2010-11 estimates increases graduate housing from 10% to 34%, an

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increase of 24%, or 3000 students, while increasing undergraduate housing by only 8%, from 33% to 41%, or 2000 students. (See LRDP, Table 3 page 8, Draft EIR, table 3-5, page 3-17)

In response to building 3000 new housing units for graduates, which is analyzed in the LRDP, the community requests that all graduate housing be located off campus with the ability to access UCLA only by shuttle.

With the housing increases the community questions the need for other development, namely of parking. If housing is increased for undergraduates, for the Master Plan for Higher Education, (with graduate housing increased) and with an aim toward shifting the campus from a commuter to a residential campus, why are there so many new parking spaces, namely 3500 additional spaces?

With additional parking there are additional trips, as the Draft EIR assumes. If the campus moves towards residential, why is there the need to use the full 25,169 parking spaces and 139,500 average daily trips? By calculation, 5000 additional housing units are being supplied. Why are there so many vehicle trips needed considering the additional housing spaces? Realistically, one would logically conclude that with additional housing there is not as much need for parking spaces, and that vehicle trips would be reduced. The community questions if the needs have realistically been assessed.

The community feels that the monies set aside for parking structures should be diverted to other mitigation measures. In order to assess all feasible mitigation measures the community feels that UCLA should assess the opportunity of expanding the use of other forms of mass transit and shuttle systems in lieu of building additional parking structures. This includes development of park and ride lots in strategic locations located away from impacted areas for which the impacts are substantial and claimed to not be able to be mitigated. This is a feasible mitigation measure which should be addressed.

The community therefore questions the Project Objectives of the LRDP and the need for so much development focused on graduate housing, and additional parking when the primary aim of the revised LRDP was for the Master Plan for Higher Education for undergraduate education and toward moving toward a residential campus. With 5000 additional beds, why the need for the additional development of parking structures (which means increased trips)? The community deserves a straightforward planning statement from UCLA on its Long Range Plan and reasons for the increases in the LRDP.

2. Summer Increases

The significant impacts associated with increased summertime enrollment are substantial on the surrounding communities and the community requests that they be further assessed, as follows:

A. Air Quality Violations

Implementation of the 2002 LRDP would result in daily operational emissions that contribute substantially to an existing or projected air quality violation during the twelve week summer session. 4.2-4. This impact is considered significant and even with the proposed mitigation measures will still be unavoidable. This is unacceptable to the surrounding community. The proposed new mitigation measure is limited to education of students. There are additional mitigation measures, including educating each and every person who works on campus (for the university and contractors) regarding this terrible impact and what they can do to reduce the impact, including using less air conditioning, using fewer combustion engines, causing less dust, carpooling, or use of low emission vehicles and for UCLA to hire an air quality violations monitoring employee.

14-10

It is unacceptable to the community that UCLA plans to impact air quality in a significant way, especially during the very period of the year when pollution is at its worst. The community questions why the 2002 LRDP EIR air quality violations are significant and yet the 1990 LRDP analysis was not. Air quality in Los Angeles was improving during the 1990's. Why is it acceptable in 2002 for UCLA to be a substantial violator? Certainly more mitigation can be implemented.

UCLA could be a model in asking for corporate sponsorship of the sale of low emission vehicles to UCLA faculty and employees. UCLA can certainly be more efficient in emission controls. To say that nothing else can be done to mitigate the problem is almost irresponsible given the impact to this environmentally sensitive community which impacts the Santa Monica Mountains, its flora, fauna and people, yet alone the UCLA on campus community.

14-11

Why not have a display on campus for low emission vehicles and offer parking for free for low emission/electrical vehicles?

Given the substantial impact during the summer, the community proposes as a campus program practice and procedure that UCLA establish a program which provides that on days during the summer (and for any other period) in which air pollution is at a level of "unhealthy for sensitive people" as reported by the Southern California AQMD that all construction be suspended.

The statement no other feasible mitigation measures are available is unacceptable.

B. Traffic

Implementation of the 2002 LRDP would result in additional vehicular trips during the twelve week period of summer construction, which would result in a substantial degradation in intersection levels of service. The mitigation measure includes education of students and funding of ATCS devices at certain intersections. Of note is the fact that 25 intersections will be significantly impacted by the summer session. This includes two of the worst intersections, namely Bellagio Road and Beverly Glen Boulevard and Sunset. It also includes an intersection within the jurisdiction of the communities of interest to the BABCNC , which is Sunset and Copa De Oro Simply stated, the BABCNC entire southerly border surrounding UCLA will be significantly impacted.

14-12

The community applauds the planners in finally realizing that the traffic analysis should be expanded to intersections including the Mulholland and Greendale intersections with Beverly Glen Boulevard. This has not previously been done. As previously asserted by the community, these intersections are significantly impacted. The LRDP summer analysis of traffic confirms the community assertions.

14-12

Given the prior analysis in this response concerning the increase in 5000 beds (housing), why is there a significant impact? Is UCLA not utilizing all of the housing available for the students during the summer, to the detriment of the surrounding community? This is the logical conclusion because the student enrollment is not and will not be greater during summer compared to the other enrollment period, and yet, there is a significant impact at 25 intersections. The significant impact for the 2002 LRDP for the remainder of the year is only for 5 intersections.

14-13

The draft EIR concludes that there are no additional feasible mitigation measures available. The community questions this proposition and must ask why the housing is not being utilized for students during the summer, which will reduce the trips, reducing the impact. This is a viable mitigation measure which has not been addressed, and fails to address UCLA's summer programs (e.g. cheerleader camps) which restrict use of student housing. UCLA must address this available mitigation alternative, even at a cost to UCLA, in offering discounted summer housing to students to encourage the use of the campus as an actual residential campus during the summer, as opposed to increasing traffic impacts.

14-14

As UCLA knows, the campus at times is a substantial factor in bringing traffic to a standstill in the surrounding communities, especially at the 5 significantly affected intersections during the regular session.

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The BABCNC is concerned that the Sunset Boulevard and Bellagio Way intersection will again be impacted by the LRDP, without adequate analysis of possible mitigation measures, including further attempts at multi vehicle ridership sponsored and paid by UCLA. (See 4.13-1)

14-16

The BABCNC is concerned that the Sunset Boulevard and Beverly Glen intersection will again be impacted by the development, without adequate analysis of possible mitigation measures, including further attempts at multi vehicle ridership sponsored and paid by UCLA. (See 4.13-1)

14-17

While the BABCNC applauds UCLA in providing necessary funds for an ATCS system at certain intersections, and in not attempting to increase the parking levels, or trip levels, much more can be done besides the mitigation measures mentioned.

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The community applauds UCLA for the awards for the TDM program, but awards do not mitigate, do nothing for the community affected and are irrelevant to the environmental analysis. There is still much more that can be done.

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As previously stated, UCLA could be a model in asking for corporate sponsorship of the sale of

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low emission vehicles to UCLA students, faculty and employees. UCLA can certainly be more efficient in emission controls and in encouraging and educating the faculty and employees regarding low emission vehicles. Why not have a demonstration (display) area on campus regarding the benefits of carpooling, or offering additional incentives for carpooling? These are all valid measures.

More commuter education and programs can be implemented. Why have TDM program education only during registration? Why is there no such educational program for faculty and employees? Why not post materials on bulletin boards, and in the Daily Bruin. Much more education can be offered.

While UCLA has taken certain measures to reduce vehicle trips it has also taken action to increase trips. Not addressed in the Draft EIR is the increase of outside vendors on campus and UCLA's current practice of failing to have a university-wide system of purchasing. Coordination of purchasing and decreasing the number of vendors which offer items for sale and services on campus should be considered.

Not addressed is the issue of whether UCLA actually monitors the routes of the vanpools to make sure that the significantly impacted intersections and roads are not used, or use is discouraged when another route is available?

Is there any promise that more vehicles will be added to the vanpool if requests by students increase? Has there been any outreach to the MTA to increase Metro Rapid to UCLA? UCLA should consider extending the Bruin Go Program to student use of MTA buses. Why does UCLA not address the possibility of establishing a UCLA bus system which extends beyond the borders of the campus?

The community of Beverly Glen is supportive of a shuttle for commuters on Beverly Glen and which is proposed to connect the San Fernando Valley and the west side of LA, possibly targeting commuters to UCLA. This shuttle could mitigate construction impacts and is feasible. UCLA can contribute to this proposed program as a mitigation measure.

Roscomare Valley would also like to assess the possibility of a shuttle. This shuttle could connect with Beverly Glen, including the UCLA faculty housing just off of Beverly Glen (where a shuttle network is mandated).

Given the impact and the probability that the City of LA will not install ATCS at each of the intersections where UCLA has agreed to contribute, the community requests that UCLA purchase a speed trailer, or LED speed monitoring device to mitigate traffic problems for BABCNC to use on impacted streets.

The community would like to provide input regarding rules restricting time of day of use of construction vehicles and routes to lessen the impact on the community. Considering the substantial trips generated from and backups caused by construction vehicles BABCNC demands that no vehicles use Roscomare or Beverly Glen Boulevards. UCLA must place restrictions in

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contracts and monitor the construction vehicle use of roads.

One question which must now be assessed is will UCLA actually put adequate resources into the mitigation programs given the budget cutbacks in the 2002-2003 state budget?

The community is always concerned with emergency access. The LRDP analysis does not address an emergency situation and how vehicles will be diverted away from the mountains in the event of a catastrophe such as a fire. These problems must be adequately addressed prior to imposing such substantial burdens on a purely residential area where escape routes are very restricted by limited access and egress.

The community questions the assertion that no additional feasible mitigation is available and asks ULCA to further assess what other measures are possible.

3. Noise

The Draft EIR has identified noise as a significant problem. The community would like to provide input regarding rules restricting time of day of use of construction vehicles and routes to lessen the noise on Sunset Boulevard as much as possible. Considering the substantial noise from construction vehicles BABCNC demands that no vehicles use Roscomare or Beverly Glen Boulevards.

4. Emergency Access and Services

The Draft EIR claims that there will be less-than-significant impacts on emergency access. (Impact LRDP 4.13.8 and 4.13-9). The Draft EIR fails to discuss the impacts during the regular session of the four intersections of the five impacted for which mitigation measures will not reduce impact levels to less-than-significant. The Draft EIR only discusses the result for one intersection. "Feasible mitigation has been identified to reduce these impacts to a less-than-significant level at one of the five intersections" (page 4.13-86)

The Draft EIR then moves to the summer session, without discussing the resulting impact on the four intersections impacted during the regular session and then jumps to the conclusion that the LRDP will not restrict access "to the campus". The Draft EIR concludes that a less-than-significant impact would occur, and no mitigation is required. (Page 4.13-87). The community disagrees that there will not be significant impacts and believes that given the lack of analysis for the referenced four impacted intersections, the Draft EIR is inadequate.

The community knows the impact of traffic on emergency access. Quite often traffic comes to a stop. A few years ago UCLA did nothing in response to a closure of a portion of the 405 freeway during a commencement ceremony. If a fire had occurred in the hillside occupants would have been trapped.

The community therefore proposes the following mitigation measures:

1. UCLA police should coordinate with LAPD and the Sheriffs Department when a

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situation occurs which impacts emergency services in such a significant way as referenced above. UCLA should be required to utilize the UCPD to control traffic flows, even off campus, as the campus police jurisdiction does include areas within a five mile radius.

2. UCLA should have coordinated emergency plans and emergency plans which work with LAPD and the Sheriff's Department and local community representatives and elected officials.

3. UCLA should insure that events on the campus have adequate police and traffic coverage, especially when SIG alert situations occur.

4. UCLA must study the emergency plans of LAPD which include the four intersections for which there is a significant impact, and all intersections identified as impacted significantly.

5. Mitigation Monitoring Program

UCLA needs to make sure that every respondent to the draft EIR receives a copy of the mitigation monitoring program reports so that the community can assess the monitoring program. The BABNC requests that UCLA transmit a copy of the monitoring program status quarterly during regular session and monthly during the summer session.

The community requests that an independent compliance officer be hired by the community and paid for by UCLA to assess if the programs are being implemented.

6. Cordon Count

Even though promised, the Los Angeles City Council 5th district office has apparently not been receiving the cordon counts report for vehicles (see page 3-21), nor information concerning the mitigation monitoring program. The community insists that these documents be made available to the LA City Council office 5th district office and all who respond to the draft EIR so that open assessment of the programs and monitoring is available.

7. Other Off Campus Projects

It is submitted that there are other off campus projects which will have an effect on the cumulative impacts which must be assessed (which have not) and which will combine with the development per the LRDP to have a serious, or significant impact.

Stone Canyon Reservoir Project: This project is just west of Beverly Glen and Mulholland. Given UCLA's effect on Beverly Glen and Roscomare Road, ignoring this project and the construction vehicles which will be involved in the project beginning in 2003 is a serious oversight of the Draft EIR.

Harvard Westlake school The proposed project (number 14 of table 4-1) is not of an increase of

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just 15 students, it is a proposal to add 80,000 square feet of campus structures in a purely residential area, with very limited access, with construction over a very short period. (The Holmby Hills Homeowners' Association also contends that Harvard Westlake is actually asking for an increase of 70 students over a prior agreement). This increase does not include related staff and employees which will probably equal the number of students given the size increase of the proposed buildings and related development. This affects Beverly Glen Boulevard, a significantly impacted street. The impact, including traffic, has not been adequately investigated or addressed as it relates to the Beverly Glen and Greendale intersection.

14-45

There is also a substantial probability of a change in use of Bellagio Road School. This change may cause students to be transported to school via car, versus bus because of a change to a magnet, or charter school. this would affect the intersection of Glenroy and Sunset, an intersection not evaluated in the analysis of the Draft EIR.

14-46

The Draft EIR has completely failed to assess the impact of the Santa Monica Boulevard renovation project, which will merge Santa Monica with little Santa Monica, which will contribute significantly to problems in the surrounding community .

14-47

The Draft EIR has also failed to assess the cumulative impact of the Benedict Canyon storm drain project, which will cause traffic to flow onto other canyon streets, including Beverly Glen and Roscomare.

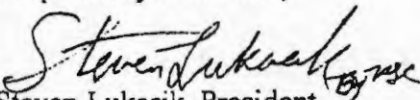
14-48

CONCLUSION

As addressed herein, very serious questions and objections have been raised by BABNC. Before there is a statement of overriding considerations, to bypass the requirement of bringing cumulative impacts regarding air pollution and traffic to a level of less than significant (which apparently the University plans to use, as addressed in the anticipated approvals, page 1-6) Regents must respond and investigate if other feasible mitigation alternatives are available and address the impacts not adequately investigated. BABNC would not have provided this input if the concerns were not genuine. The Regents are asked to pay as much attention to the surrounding community and all feasible possible mitigation measures, aimed at bringing all impacts to a level of less than significant, as it does to the Master Plan for Higher Education.

14-49

Respectfully submitted,


Steven Lukasik, President

cc: Councilman Jack Weiss
Supervisor Zev Yaroslavsky
Senator Sheila Kuehl
Assemblyman Paul Koretz
Assembly Speaker Herb Wesson
(continued)

Office of Mayor James Hahn
Southern California AQMD, Kathryn Higgins
City of LA Department of Transportation
California Department of Transportation, Stephen Buswell
Vivian Doche, Southern California Association of Governments

BABCNC/ucla02lrdpeirresp

Response to Comment Letter 14

Facsimile from Bel Air Beverly Crest Neighborhood Council (Steven Lukasik), dated December 20, 2002

Response to Comment 14-1

This comment contains introductory information, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. Therefore, no response is required.

Response to Comment 14-2

This comment is acknowledged. Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA campus) for a discussion of the allocation of enrollment growth across the University of California system.

Response to Comment 14-3

The University has prepared an EIR that meets the procedural and substantive requirements of CEQA and the *CEQA Guidelines*. Please refer to Responses to Comments 14-10 through 14-47 for discussions of the impact analyses commented upon in this letter.

Response to Comment 14-4

The 2001 Student Housing Master Plan (SHMP) and the 2002 LRDP provide for the continued development of student housing for both undergraduate and graduate students to enhance the educational experience and to continue the evolution of UCLA from a commuter to a residential campus. The 2001 SHMP is a planning and feasibility study which seeks to house approximately 58 percent of UCLA student enrollment, consisting of both undergraduate and graduate students, in a combination of university-owned housing or private-sector housing within one mile (or walking distance) of campus by 2010. In order to provide guaranteed undergraduate student housing (as articulated in the 2001 SHMP), the NHIP, which is a project-specific component of the 2002 LRDP, specifically provides for 2,000 additional bed spaces in the Northwest zone of campus for undergraduate students. Further, undergraduate housing on campus has increased by about 3,000 spaces since 1990, which was consistent with the goal of the 1990 SHMP to provide guaranteed housing for undergraduate students. By contrast, the inventory of University-owned housing for single graduate and professional students has actually declined since 1990 due to the closure of Mira Hershey Hall. In fact, only 6 percent of single graduate students live in University-owned housing and only 25 percent of graduate student families live in University-owned housing. Like the 1990 SHMP, the 2001 SHMP sets goals for guaranteed student housing for graduate students in addition to undergraduate students. Therefore, the greater relative

increase in graduate student housing is intended to better accommodate this unmet demand and achieve the goals of the 2001 SHMP.

In addition, while the anticipated relative increase in graduate students housed in University-owned housing by 2010 is greater than the anticipated relative increase in undergraduate students housed in University-owned housing by 2010, the overall number of undergraduate students anticipated to be housed in University-owned housing by 2010 is far greater than the number of graduate students anticipated to be housed in University-owned housing by 2010.

Response to Comment 14-5

Table 3 of the 2002 LRDP indicates that approximately 3,000 additional graduate students would be housed in University-owned housing by 2010, which includes both on-campus and off-campus housing. Of the 3,000 graduate students, approximately 2,000 would be located in the Southwest Campus Housing and Parking Project, which is currently under construction and cannot be relocated to an off-campus site. Of the remaining 1,000 graduate students that would be housed in University-owned housing, some could be located on-campus and some could be located off-campus depending upon affordability, recruitment and retention goals, student housing choices, and the need to create a cohesive student community by integrating housing programs with other aspects of campus life.

It should also be noted that the Southwest Campus Housing and Parking Project (containing graduate student housing) is remote from the main campus. As stated on page IV.C-28 of the UCLA Southwest Campus Housing & Parking Final Environmental Impact Report (SCH No. 2000051014, January 2001), "Southwest Campus residents will not be eligible for permits for daytime parking on the main campus." (Daytime parking is defined as prior to 4:30 P.M. on weekdays.) Therefore, most of these students are anticipated to travel to the main campus via a campus shuttle, walking, or bicycle.

As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 to 4.13-17):

The 1990 LRDP EIR incorporated components of the [Transportation Demand Management] program as mitigation measures and proposed a substantial expansion of on-campus housing to further reduce student commute trips. Over time, the components of the TDM program have changed, as the campus strives to identify cost-effective strategies to reduce campus trip generation and parking demand.

While on-campus housing reduces student-related vehicle trips, the provision of off-campus student housing could actually increase student-related vehicle trips, as many students would still elect to drive to campus (similar to any commuting student), even if a shuttle or other form of alternative transportation is provided. Therefore, environmental impacts would not be reduced by locating graduate housing off campus. Furthermore, even if a shuttle was provided, UCLA cannot mandate the

exclusive use of a shuttle by residents. Therefore, the provision of off-campus housing and the use of a shuttle is not a feasible alternative to the proposed project.

Response to Comment 14-6

Concurrent with the 2002 LRDP, the University has proposed the Northwest Housing Infill Project (NHIP), which would construct approximately 2,000 beds of undergraduate student housing, of which approximately 1,675 would accommodate new students, with the remainder used to replace existing beds in triple occupancy rooms. The NHIP also includes a parking structure, proposed to be developed on a site south of Dykstra Hall, which would provide a total of 299 spaces, of which 233 would replace spaces lost due to construction and 66 would be new spaces to serve the proposed new housing. Thus, the 2002 LRDP only proposes the construction of 66 net new spaces as part of the NHIP.

The University has no plans for an additional 3,500 parking spaces, beyond the parking provided by projects that were previously-approved and/or are under construction. As discussed in the 2002 LRDP Draft EIR (Volume 1, page 4.13-89):

UCLA currently maintains an on-campus parking space inventory of 22,330 spaces (including 1,310 stack spaces). Upon the completion of the Westwood Replacement Hospital, the Southwest Campus Housing and Parking, and the Intramural Field Parking Structure projects (which have been previously approved and/or are under construction and would add approximately 3,552 spaces), and the reduction of stack parking to approximately 597 spaces, the inventory would be maintained at or below the 25,169-space limit adopted in the 1990 LRDP. As required by PP 4.13-1(b), the parking space cap would be maintained under the 2002 LRDP.

It should be noted that the Southwest Housing and Parking project would develop approximately 2,000 beds of graduate student housing. In order to be competitive with comparable off-campus housing, that project would provide approximately 1 parking space for each bed. Thus, a substantial portion of the previously-approved increase in the supply of on-campus parking is intended to be allocated to graduate student residents that reside on the southwest campus. As noted above in Response to Comment 14-5, those students will receive parking permits that are not valid in main campus parking lots until 4:30 P.M. on weekdays.

During the planning horizon of the 2002 LRDP, the ability of the campus to provide additional parking (beyond the previously-approved and under construction parking projects) will be limited by the parking cap of 25,169 spaces established in the 1990 LRDP. Because the previously approved and under construction projects will increase the supply of parking to approximately 597 spaces below the parking cap, the University will be limited to the development of 597 new physical spaces (which would replace stack parking spaces) or to the replacement of existing physical spaces (which may be removed as a result of development). As noted above, 66 net new spaces have been proposed as part of the NHIP. While

the NHIP will reduce parking demand and vehicle trips associated with undergraduate commuter students, the increase in faculty and staff associated with the 2002 LRDP will increase demand for on-campus parking.

Response to Comment 14-7

The statement that additional parking results in additional trips is acknowledged. In general, fewer parking spaces (on a per person basis) are provided for residential students than for commuter students. (Currently, approximately 1 in 9 resident undergraduate students receive a parking permit, while approximately 1 in 5 commuter students receive a parking permit.) However, as noted in Response to Comment 14-6, the Southwest Campus Housing and Parking project would add approximately 2,000 beds of graduate student housing with parking at a ratio of approximately 1 parking space per student bed.

As discussed in Response to Comment 14-6, with the completion of under construction and previously approved projects (including the Southwest Campus Housing and Parking project), the on-campus supply of parking would total approximately 24,572 physical spaces, 597 spaces below the on-campus parking cap. As a conservative assumption, the 2002 LRDP Draft EIR assumed that to accommodate demand for parking, approximately 597 stack parking spaces would be utilized, such that the on-campus parking inventory would reach 25,169 spaces. To the extent that parking demand is reduced by continued implementation of the TDM program, then fewer stack parking spaces could be provided, and thus the on-campus parking inventory could be less than 25,169 spaces during the planning horizon of the 2002 LRDP.

As discussed in the 2002 LRDP Draft EIR, implementation of the 2002 LRDP would slightly increase trip generation (compared to existing conditions) to approximately 131,150 average daily vehicle trips. Thus, even with the projected utilization of 25,169 on-campus spaces, trip generation would remain well below the limit of 139,500 average daily vehicle trips established in the 1990 LRDP.

The Draft LRDP and 2002 LRDP Draft EIR did not propose, or analyze, an increase of 5,000 additional housing units. As discussed in Response to Comment 14-6, concurrent with the LRDP, the University has proposed the Northwest Housing Infill Project (NHIP), which would construct approximately 2,000 beds of student housing, of which approximately 1,675 would accommodate new students. Even including the previously-approved Southwest Campus Housing and Parking Project, the net capacity of on-campus residential facilities would increase by approximately 3,675 beds compared to current conditions.

As discussed in the 2002 LRDP Draft EIR, the proposed expansion of on-campus housing would contribute to a reduction in vehicle trips compared to conditions that would occur without such housing, as commuter students would become resident students (and thus generate fewer peak hour and average daily vehicle trips). However, the increases in campus population associated with implementation of the 2002 LRDP (including faculty, staff, and visitors) would increase parking demand to such an extent that it was assumed that all 25,169 parking spaces would be utilized (by these additional faculty, staff and visitors, for whom trip rates are higher than residential students), and the utilization of these parking spaces would generate additional vehicle trips. Therefore, the traffic analysis in the 2002 LRDP Draft EIR projected that implementation of the 2002 LRDP would result in an overall increase in campus-related vehicle trips, despite the proposed increase in on-campus student housing.

The University acknowledges that it is logical to assume that additional on-campus housing reduces demand for parking and therefore vehicle trip generation would also be reduced. However, as noted above, the parking demand and trip generation associated with the projected increases in campus population (resulting from implementation of the 2002 LRDP) would be greater than the reductions (in trip generation) associated with the proposed NHIP. Thus, the analysis in the 2002 LRDP Draft EIR did include a realistic assessment of all of the effects of implementation of the 2002 LRDP, including changes in student housing and total campus population.

Response to Comment 14-8

As noted in the Final EIR for the IM Field Parking Structure (Volume 3, Comments and Responses, pages III-28 and III-29):

In 1960, the state legislature eliminated the use of state tax funds for parking purposes on all University of California (UC) campuses. In keeping with this law and related decisions by the UC Regents, the UCLA Parking system is operated and maintained exclusively by parking fees and is not supported by state or other public funds. UCLA parking fees are established to provide for the development, financing, construction, operation, and maintenance of existing and proposed campus parking facilities, as well as the TDM Program. Therefore, the cost of a parking permit at UCLA reflects all of the costs of the parking system, including all TDM Program elements.

Thus parking fees are already used to support alternative transportation programs, which were described in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 to 4.13-18):

The Transportation Demand Management (TDM) Program began at UCLA in 1984 with the establishment of the Commuter Assistance—Ridesharing (CAR) department to promote formation of carpools, vanpools, and buspools and to expand utilization of alternative transportation modes. In 1987, a Transportation Systems and Demand Management program was adopted to reduce peak-hour traffic and reduce parking demand, with reduced fees for carpools, subsidies for van pools, shuttles from off-campus UCLA-owned housing clusters and remote parking lots, on-campus facilities for bicycles and mopeds, alternative work schedules, and campus participation in local and regional traffic improvement programs. The 1990 LRDP EIR incorporated components of the program as mitigation

measures and proposed a substantial expansion of on-campus housing to further reduce student commute trips. Over time, the components of the TDM program have changed, as the campus strives to identify cost-effective strategies to reduce campus trip generation and parking demand. Buspool service to remote park-and-ride lots and reduced-price parking lots at the Veterans Affairs property were discontinued due to low demand. A stratified parking fee system (where permits at convenient locations and with increased mobility cost more) was implemented. Campus Express shuttle service is being substantially expanded since its inception. The potential benefits of a transit subsidy for faculty and staff have been evaluated. Overall, the TDM program has evolved into a comprehensive program that offers a broad range of services to encourage and assist UCLA commuters in utilizing alternatives to the single-occupancy vehicle. As part of its on-going TDM Program, UCLA currently provides and promotes

- Vanpools
- Carpool matching and parking incentive programs
- Commuter Assistance-Ridesharing (CAR)
- Financial incentives for carpool and vanpool participants
- Accommodation of the use of other modes of transit (e.g., bicycles, motorcycles, and scooters)
- Shuttle bus service (around campus and to remote housing)
- Alternative work schedules and telecommuting
- Annual distribution of the UCLA Commuter's Guide
- Parking control management
- Restricting access to main campus parking facilities for on-campus housing residents
- TDM outreach
- On-campus housing

As a result of these various initiatives, the TDM program has reduced faculty and staff parking demand by more than 12 percent (below 1990 LRDP levels). In addition, since 1990, when the SCAQMD first required a survey of all employees to determine Average Vehicle Ridership³ (AVR), the TDM program increased the campuswide AVR from 1.26 to 1.51 by spring 2000, exceeding the goal of 1.5 set by the SCAQMD. Currently, approximately 1,000 active carpools serve over 2,300 participants, and over 130 vans cover more than 85 communities and accommodate approximately 1,425 monthly full-time riders.

In addition, the campus currently operates a pilot transit fare subsidy program entitled "BruinGo." UCLA and the Santa Monica Municipal Bus Lines launched the program at the beginning of academic year 2000-01...

The 2002 LRDP Draft EIR addressed the feasibility of a further expansion of the TDM program (Volume 1, Section 4.13 [Transportation/Traffic], pages 4.13-47 to 4.13-48), which could include expansion of mass transit and shuttle systems:

To achieve additional reductions in parking demand and vehicle trip generation, the campus could further expand the TDM program. As noted above, since the inception of the TDM program, the components of the program have varied, as the University has investigated various programs and

³ The AVR is the ratio of employees arriving between 6 A.M. and 10 A.M. to the motor vehicles they drive to campus.

incentives. Remote park-and-ride lots served by buspools and near-campus lots (on the Veterans Affairs property with shuttle service to campus and reduced permit rates) were both discontinued due to low demand. Transit subsidies for faculty and staff have previously been evaluated and have not been recommended because of the limited potential to reduce total parking demand. The campus has extended the BruinGo transit pass pilot program for another year and will further evaluate the potential of the program to cost-effectively reduce parking demand. The University will continue to search for strategies to reduce parking demand and trip generation that are both cost-effective and attractive to faculty, staff, and students. PP 4.13-1(d) commits the campus to continue implementation of appropriate TDM strategies in order to meet the trip reduction and AVR targets established by the SCAQMD. However, no feasible strategy or program, beyond those already implemented or described herein, has been identified that would substantially expand participation in the TDM program and/or result in sizable decreases in parking demand or vehicle trip generation. Technological advancements, changes in commuting patterns, increases in commuting costs, or other factors could affect future participation in TDM programs. However, in the absence of such changes in external conditions, substantial expansion of the components of the TDM program is not considered feasible.

As noted above, the University previously operated park-and-ride lots at remote locations (including the Sepulveda Basin in the San Fernando Valley and Alpine Village in Torrance). Those locations were served by a campus-operated bus, which took riders directly to campus. After a trial period, the bus pool programs to park-and-ride lots were discontinued due to low participation. The University also operates a vanpool program with approximately 130 vans currently operating. Many of these vans do serve remote park-and-ride lots, established by Caltrans at remote locations. It is also assumed that some number of the 1,000 active carpools may also take advantage of remote park-and-ride lots. Thus, the University has been successful at utilizing park-and-ride lots for small groups (e.g., vanpools or carpools) but was previously unsuccessful in attracting groups of participants that were large enough to make operation of a shuttle bus to those locations financially feasible. Thus, there is no evidence to support the suggestion that the use of remote park-and-ride lots is a feasible mitigation measure.

The 2002 LRDP Draft EIR acknowledged that the TDM program would be maintained (as PP 4.13-1(d)) and that the campus would continue to investigate a range of options as new technologies are developed or alternate program elements are found to be more effective. Inclusion of PP 4.13-1(d) in the 2002 LRDP Draft EIR commits the University to continue the TDM program throughout the 2002 LRDP planning horizon and to meet the trip reduction and AVR (average vehicle ridership) requirements established by the South Coast Air Quality Management District (SCAQMD).

Response to Comment 14-9

Refer to Responses to Comments 14-4, 14-5, and 14-7 for a discussion of undergraduate and graduate student housing proposed under the 2002 LRDP, as well as trip generation rates of faculty, staff, and student populations. With respect to project objectives, there is no primary project objective; instead, the combined academic, physical, and operation of objectives articulated in the 2002 LRDP EIR are

intended to guide the future growth and physical development of the UCLA campus in support of its academic, research, and public service mission. Further, one of the objectives of the LRDP EIR is to maintain the 1990 LRDP campus parking limit of 25,169 parking spaces, which would not result in any additional parking beyond that originally envisioned in the 1990 LRDP. The 1990 LRDP established the parking limit to reduce vehicle trips while satisfying the parking needs of campus students, faculty, employees, and visitors to the maximum extent practicable and maximizing the University's goals of promoting alternative methods of transportation. UCLA continues to reduce the need for on-campus parking and the associated generation of vehicle trips through the implementation of a Transportation Demand Management (TDM) program that includes, but is not limited to, provision of on-campus housing, van pools, ride-sharing incentives, shuttles, and other transportation modes and incentives. While the TDM program is highly effective in reducing reliance upon the automobile and even exceeds the goals of the South Coast Air Quality Management District for Average Vehicle Ridership, there is still an unmet demand for parking that will not be fully accommodated within the existing parking limit of 25,169 spaces.

Response to Comment 14-10

The determination of "significance" for air quality impacts associated with the 2002 LRDP is governed by the thresholds and criteria established by the South Coast Air Quality Management District (SCAQMD), and published in SCAQMD's *CEQA Air Quality Handbook*. These thresholds are based upon increases in daily emissions caused by both construction activities as well as operational emissions, which are primarily traffic-related. Consistent with the designation of the South Coast Air Basin as a nonattainment area for ozone, CO, and PM₁₀ (Volume 1, pages 4.2-3 and 4.2-4), these daily thresholds are set at a relatively low level, which encourages development projects in the South Coast Air Basin to implement feasible mitigation measures to reduce emissions. See *CEQA Air Quality Handbook*, page 6-2, 3. As detailed in the 2002 LRDP Draft EIR and further below in this Response, the University will implement all feasible mitigation measures for air quality, including UCLA's extensive TDM program to reduce vehicle trips. Under the methodology required by the *CEQA Air Quality Handbook*, exceedances of daily emissions thresholds by a specific project does not necessarily mean that the project is undermining efforts to achieve cleaner air, as the SCAQMD's Air Quality Management Plan (AQMP) recognizes that population growth in the South Coast Air Basin will continue. The AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Growth considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Growth under the 2002 LRDP is consistent with the growth assumptions of the AQMP (see Impact LRDP 4.2-5 [Volume 1, pages 4.2-34

to 4.2-36] and Impact LRDP 4.10-1 [Volume 1, pages 4.10-9 to 4.10-13]), and thus would not impair regional efforts to attain air quality standards.

Mitigation of the significant operational air quality impacts during the twelve-week summer session is not limited to the education of students. As stated in the 2002 LRDP Draft EIR (Volume 1, Section 4.2 [Air Quality], page 4.2-34), implementation of MM 4.2-4, as well as PP 4.2-1(a), PP 4.2-1(b), PP 4.2-2(a) through PP 4.2-2(c), and PP 4.2-3, ensures that the number of motor vehicle trips and stationary source emissions are reduced to the maximum extent feasible during the summer session.

The comment has recommended that potential mitigation could include educating each and every person who works at the campus (for the University and contractors) regarding the air quality impact and what they can do to reduce the impact. The specific actions recommended by the commenter are discussed as they apply to the existing campus programs, practices, and procedures and the mitigation measures recommended in the 2002 LRDP Draft EIR.

Using Less Air Conditioning

As discussed in Section 4.2 (Air Quality) of the 2002 LRDP Draft EIR (Volume 1, page 4.2-10), all stationary sources of emissions recently constructed and operated within the UCLA campus have incorporated Best Available Control Technology (BACT) as part of the permit requirements from the SCAQMD to control the overall amount of emissions that these sources generate. Under SCAQMD rules, BACT is defined as the most stringent emissions control which, for a given class of air pollutant source, has been achieved in practice, identified in a State Implementation Plan, or has been found by the SCAQMD to be technologically achievable and cost-effective. A primary source of the stationary source emissions generated at the UCLA campus is the Energy System (co-generation) Facility (ESF), which simultaneously produces electricity, steam (to heat campus buildings), and chilled water (for air conditioning and cooling). Other in-building and auxiliary stand-alone chillers are located within the campus to produce additional chilled water for air conditioning and cooling needs. These chiller systems are substantially more energy efficient for large institutions than smaller air conditioning units. In addition, PP 4.2-3 requires the campus to 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. Finally, air conditioning units in campus buildings are under sealed control, are set for optimal efficiency, and cannot be re-adjusted by building occupants. As such, the campus has already reduced the energy demand and emissions associated with air conditioning equipment to the maximum extent feasible. Using this equipment less is considered to be unnecessary and would only increase air temperatures

within classrooms and offices, and may reduce the ability to faculty, staff, and students to concentrate, work, and learn.

Using Fewer Combustion Engines

The comment recommends using fewer internal combustion engines, but does not specify which engines or vehicles should be reduced or eliminated from the campus fleet or construction equipment. Each of these vehicle types are discussed below.

Under PP 4.2-2 (b), the campus shall continue to require by contract specifications that construction equipment engines will be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction. Internal combustion engines work most efficiently and cleanly when they are in good condition and proper tune. Under MM 4.2-2(a) the campus shall require by contract specifications that construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than five minutes. This will eliminate unnecessary idling of construction engines. Under MM 4.2-2(b) the campus shall encourage contractors to utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) and low-emission diesel construction equipment to the extent that the equipment is readily available and cost effective. These measures ensure that construction equipment generates the least amount of emission when they are in operation. With these programs, the campus has reduced the emissions associated with internal combustion engines at the campus to the maximum extent feasible. Using fewer pieces of equipment during construction would reduce the amount of daily emissions, but would increase the length of construction activities. This would result in increased cost for each construction project and generate construction noise for longer periods of time. Therefore, the use of fewer combustion engines during construction is not recommended.

As discussed in Section 4.2 (Air Quality) of the 2002 LRDP Draft EIR (Volume 1, page 4.2-11), UCLA operates a fleet of motor vehicles that utilize electricity and alternative fuels. Of the 854 existing campus-operated vehicles, 22 are electric sedans, vans, and trucks; six are electric/unleaded hybrid sedans; and 112 are electric carts and scooters. UCLA also recently announced the gift of 127 electric vehicles from Global Electric Mobilcars, a DaimlerChrysler company, which will be used as fleet vehicles by the University Housing, Facilities Management, and Telecommunication Services departments. Therefore, UCLA is already using, and will continue to use, non-combustion vehicles as part of its operating fleet.

Causing Less Dust

As shown in Table 4.2-6 (Future Without and With Project Daily Operational Campus Emissions—Summer Session) of the 2002 LRDP Draft EIR (Volume 1, page 4.2-33), the net increase in daily emissions of PM_{10} during the regular and summer sessions do not exceed the daily thresholds of significance recommended by the SCAQMD and are not considered significant. Therefore, no mitigation is required for this impact. Under PP 4.2-2(a), the campus shall continue to implement dust control measures consistent with SCAQMD Rule 403—Fugitive Dust during the construction phases of new project development. The actions currently recommended to implement Rule 403 have been quantified by the SCAQMD as being able to reduce dust generation between 30 and 85 percent depending on the source of the dust generation.

Carpooling

As discussed in Section 4.2 (Air Quality) of the 2002 LRDP Draft EIR (Volume 1, page 4.2-13), carpool matching and commuter-assistance ridesharing are existing components of the campus TDM program. Carpool matching is performed by Southern California Rideshare, the region's ridesharing agency. In addition, UCLA's Commuter Guide gives a full explanation of carpooling options, including an explanation of the convenience and money-saving options of carpool parking permits. Information on how to receive a customized "RideGuide," which aids commuters in finding other people to ride with, is located in the Commuter Guide, including a RideGuide request form. A custom RideGuide not only provides a list of potential carpoolers, it contains a comprehensive, personalized outline of the major transportation options from the individual's community. There are currently over 1,000 active carpools with over 2,300 participants at UCLA.

Commuter Assistance-Ridesharing (CAR) currently operates a fleet of over 130 vans, covering more than 85 southern California communities. Approximately 1,425 monthly full-time riders participate in the program, for which fares are partially subsidized by the campus. Part-time riders can also use the van service at any time on a space available basis. The customized RideGuide provides potential riders with full information on current routes to their community.

To further support the campus carpooling and vanpooling efforts, UCLA Transportation Services has an "Emergency Ride Home" program that offers full-time vanpool and carpool participants who must get home during the day for a family emergency or who have to work late free or subsidized rental cars, nightrider vanpools, or special arrangements with existing van and carpools.

PP 4.2-1(b) requires the campus to implement a TDM program that meets or exceeds all trip reduction and AVR requirements of the SCAQMD. Although the TDM program may be subject to modification as

new technologies are developed or alternate program elements are found to be more effective, carpooling is expected to remain an important component of the TDM program through the planning horizon of the 2002 LRDP.

Use of Low Emissions Vehicles

As discussed in Section 4.2 (Air Quality) of the 2002 LRDP Draft EIR (Volume 1, page 4.2-11), UCLA operates a fleet of motor vehicles that utilize electricity and alternative fuels. Of the 854 existing campus-operated vehicles, 22 are electric sedans, vans, and trucks; six are electric/unleaded hybrid sedans; 112 are electric carts and scooters; 62 are sedans, vans, trucks, and buses fueled by compressed natural gas (CNG), including all of the vehicles in UCLA's campus-operated shuttle bus service; eight are CNG/bi-fuel sedans; and six trucks are fueled by propane. All of the vehicles in UCLA's campus-operated shuttle bus service are fueled by CNG. These vehicles emit substantially less air pollutant emissions than their gasoline and diesel-fueled counterparts. In fact, the SCAQMD gave UCLA an Honorable Mention Award in 2000 for its fleet of clean-operating CNG transit buses. An on-campus CNG fueling station makes the use of these vehicles more convenient and cost-effective.

UCLA also continues to participate in the SCAQMD electric vehicle (EV) infrastructure program called "Quick Charge LA." This program consists of a network of over 200 EV charging stations at transit centers, shopping malls, and other locations throughout the region. Currently, there are 26 public electric parking spaces at the UCLA campus. Location information and maps are available at the Parking Services office on the main campus and on the Transportation Services Website. UCLA also recently announced the gift of 127 electric vehicles from Global Electric Mobilcars, a DaimlerChrysler company, which will be used as fleet vehicles by the University Housing, Facilities Management, and Telecommunication Services departments.

Under MM 4.2-2(b) the campus shall encourage contractors to utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) and low-emission diesel construction equipment to the extent that the equipment is readily available and cost effective.

Therefore, the use of low emission vehicles is already occurring at the campus and would continue to occur throughout the planning horizon of the 2002 LRDP.

Hire an Air Quality Violations Monitoring Employee

The TDM program is developed and implemented by a group of campus administrators and approved by the SCAQMD. The amount of fuels that can be used and the emissions generated by stationary sources at the campus are regulated by the SCAQMD through their permitting process. Annual reports must be prepared by campus staff and submitted to the SCAQMD for review. Implementation of the mitigation

measures associated with campus development projects are monitored by campus employees throughout the development process. All mitigation measures (MMs) and campus programs, practices, and procedures (PPs) included in this Final EIR for the 2002 LRDP are included in the Mitigation Monitoring and Reporting Program (MMRP), which is included in Chapter IV of this Final EIR. In each of these circumstances, campus employees would monitor air quality reduction efforts. No additional personnel are needed to evaluate potential air quality violations at the campus.

Response to Comment 14-11

The EIR prepared for the 1990 LRDP assumed that emissions associated with the campus in 2005 would be less under the 1990 LRDP than without the LRDP. This is because the campus would convert from the previous Central Steam Plant (CSP) to the Energy System (co-generation) Facility (ESF) and because the campus would generate less traffic with the 1990 LRDP. The conversion from the CSP to the ESF reduced the emissions associated with electricity generation, heating, and cooling, by substantial amounts. The traffic analysis for the 1990 LRDP assumed that campus trip generation would be reduced from 145,177 average daily trips (ADT) without the LRDP to 139,504 ADT under the 1990 LRDP. Annual emissions of criteria pollutants would be reduced accordingly. Calculated together, the EIR for the 1990 LRDP concluded that the 1990 LRDP would result in a net reduction in criteria pollutants. The 1990 LRDP did not, however, specifically evaluate summer session emissions or a substantial increase in summer session enrollment.

Under the 2002 LRDP, there would be a net increase on daily emissions associated with stationary sources, landscape maintenance, and motor vehicles beyond the future without project uses at the campus during the regular and summer sessions. The net increase in emissions during the regular session would not exceed the thresholds of significance recommended by the SCAQMD. During the twelve-week summer session, the net increase of three air pollutants (CO, VOC, and NOx) would exceed these thresholds and be considered significant. As discussed in the 2002 LRDP Draft EIR (Volume 1, page 4.2-25), the 2002 LRDP is consistent with the 1997 AQMP and the 1999 Amendment for Ozone. Therefore, the 2002 LRDP would not jeopardize attainment of the air quality levels identified in the AQMP even though the daily operational emissions generated during the summer session would exceed the SCAQMD's recommended daily emissions thresholds.

The 2002 LRDP Draft EIR does address the potential air quality impacts of the 2002 LRDP and identifies measures to reduce emissions. The 2002 LRDP Draft EIR (Volume 1, Section 4.2 [Air Quality]) includes six campus programs, practices, and procedures, and three mitigation measures that would be continued throughout the 2002 LRDP planning horizon. The specific actions recommended by the

comment are discussed below as they apply to the existing campus programs, practices, and procedures and the mitigation measures recommended in the 2002 LRDP Draft EIR.

UCLA Could Be a Model in Asking for Corporate Sponsorship of the Sale of Low Emissions Vehicles to UCLA Faculty and Employees

While it is not clear from the comment what is specifically meant by "corporate sponsorship," the following summarizes what is currently available in this regard. The University Credit Union currently organizes private car sale days with new and used car companies. These events provide faculty and employees of UCLA, Pepperdine University, the Getty Trust, and others the opportunity to purchase vehicles at discounts that are generally unavailable to the general public. In this manner, corporate support for discounted vehicle sales is provided. The sales events often include vehicles that would meet this standard since most manufacturers are offering ultra low-emission vehicles and super ultra low-emission vehicles as part of their product lines.

The California Air Resources Board (ARB) provides a buyers guide for low emission vehicles on its web site (www.arb.ca.gov/msprog/ccbg/ccbg.htm). For the 2002 model year, the buyers guide lists 96 passenger cars and 49 trucks, vans, and SUVs as ultra low-emission vehicles. The cars are 50 percent cleaner than the average new 2001 model year passenger car. The trucks, vans, and SUVs are 50 percent cleaner than the average similar weight new vehicle. Examples of these ultra low-emission vehicles include the Acura 3.2 TL, the BMW 530i, the Chevrolet Monte Carlo and K1500 Silverado pickup, the Chrysler PT Cruiser, the Dodge Ram pickup, the Ford Mustang 3.8 and F 150 pickup, Honda Civic and Accord, Mercedes Benz S 430, the Toyota Camry, and the Volkswagen Passat. Many of these vehicles are already purchased and used by faculty, staff, and students. The buyers guide also lists six passenger cars and seven trucks classified as super ultra low-emission vehicles. The cars are 70 percent cleaner than the average new 2001 model year passenger car, and the trucks are 70 percent cleaner than the average similar weight new vehicle.

Because the University Credit Union's private car sale days are considered a benefit to faculty and employees, the available selection is not limited to low-emission vehicles. Employees are free to purchase the vehicles of their choice. However, the University has for many years investigated and utilized alternative fuel vehicles and low-energy consumption vehicles (including electric and natural-gas fueled) as part of its private vehicle fleet. UCLA recently announced the gift of 127 electric vehicles from Global Electric Mobilcars, a DaimlerChrysler company, which will be used as fleet vehicles by the University Housing, Facilities Management, and Telecommunication Services departments.

UCLA Can Be More Efficient in Emission Controls

The existing campus air quality controls are discussed in detail in the 2002 LRDP Draft EIR (Volume 1, pages 4.2-10 to 4.2-15). These controls include Best Available Control Technology (BACT) for new stationary sources, energy conservation, alternative transportation (including BruinGo), alternative fuel vehicles, electric vehicle infrastructure, and the campus TDM program. Each of these controls is successful at substantially reducing the emissions that would otherwise be generated by the uses and operations at the campus. Please see Response to Comment 14-10 for additional information regarding existing and recommended campus emission controls.

Have a Display on Campus for Low-Emissions Vehicles

Every year in October, in conjunction with State Rideshare Week, UCLA Transportation Services sponsors a day-long Transportation Fair in Bruin Plaza at the heart of the campus. Both on-campus and regional transportation service providers are on hand to distribute commuting information and to answer individual questions. As part of the fair, every year there is a display of state-of-the-art alternative fuel vehicles. Some of the new vehicles that have been displayed in the past have been

- Toyota Prius—hybrid vehicle (gasoline and electric vehicle)
- Toyota CNG Camry
- DaimlerChrysler GEM—electric low speed vehicle (LSV)
- Sherpa electric truck
- Tiger Truck—CNG LSV
- Advantage—electric LSV
- Lido Motors—LSV with the look of a PT Cruiser
- General Motors full size CNG van—these will be used as fleet vehicles in the campus vanpool program

UCLA plans to continue the Transportation Fair through the planning horizon of the 2002 LRDP.

Offer Free Parking for Low-Emission/Electric Vehicles

As discussed in Response to Comment 14-8, the UCLA Parking system is a self-supporting program that is operated and maintained exclusively by parking fees. It is not supported by any state or other public funds. UCLA parking fees are established to provide for the development, financing, construction, operation, and maintenance of existing and proposed campus parking facilities. Therefore, the cost of a parking permit at UCLA reflects all of the costs of the parking system. The parking fees also help to fund the campus TDM program, which was adopted in 1987 to reduce campus trip generation and parking demand. Because all vehicles traveling to and from the campus contribute to the campus trip generation

and parking demand, they must also contribute to the costs of the TDM program. Offering additional free parking could impact funding of TDM program initiatives.

Many vehicles classified by the ARB as ultra low-emission vehicles and super ultra low-emission vehicles are readily available and already used by faculty, staff, and students to commute to campus. Refer to Response to Comment 14-10 for a discussion of vehicles that are classified by the ARB as ultra low-emission vehicles and super ultra low-emission vehicles. Because these vehicles would operate with or without free parking, this measure would not be effective at reducing the air quality impacts of the project. This measure would be inconsistent with the trip generation and parking demand policies of the TDM program. It would also and eliminate critical funding sources from the self-supporting UCLA Parking program without reducing any demand for parking.

There are currently 26 parking spaces reserved for electric vehicles (EVs) on the UCLA campus. The campus offers discounted monthly parking permits for EVs. Whereas the regular "yellow" parking permit fee is \$52 per month, individual EVs are permitted for \$46 per month, 2-person EV carpool vehicles are permitted at \$18 per month per person, and 3-person EV carpool vehicles are permitted at \$9 per person per month. In addition, electricity is provided for these vehicles free-of-charge by the campus. Only about seven or eight EVs presently park in these spaces during peak parking-demand periods of the day. This indicates that discounted parking has not increased the number of EVs traveling to and from the campus and there is no demand for additional campus EV parking. Therefore, this suggested measure would not be effective at reducing the air quality impacts of the project.

Suspend Construction on Days Reported at a Level of "Unhealthy for Sensitive People" by the SCAQMD

As a means of mitigating significant air quality impacts during construction, the SCAQMD *CEQA Air Quality Handbook* recommends that all construction equipment operations be suspended during second stage smog alerts. A second stage smog alert equates to a level of 275 and above on the U.S. EPA's 0 to 500 Air Quality Index (AQI). AQI values of 0 to 50 are considered good, 51 to 100 are considered moderate, 101 to 150 is unhealthy for sensitive groups, 151 to 200 is unhealthy, 201 to 300 is very unhealthy, and above 300 is hazardous. Based on the AQI, a second-stage smog alert would occur in the upper part of the very unhealthy category.

An AQI level of 100 is the point when ambient ozone concentrations exceed National standards. As shown in Table 4.2-1 (Summary of Ambient Air Quality in the Project Vicinity) of the 2002 LRDP Draft EIR (Volume 1, page 4.2-4), the National ozone standards have not been exceeded in the vicinity of the campus in recent years. Second stage smog alerts have not been issued for coastal Los Angeles County for more than a decade. Therefore, the 2002 LRDP Draft EIR did not include the SCAQMD's

recommended measure since it is unlikely to be implemented throughout the planning horizon of the 2002 LRDP.

The comment is recommending that construction be suspended any time that the AQI exceeds 100. The last time this level was exceeded in the campus vicinity was one day in 1998 and the time before that was one day in 1996. Therefore, an AQI of 100 has not been exceeded locally in several years and, because air quality throughout the South Coast Air Basin has been steadily improving over the past decades, may not happen in any future years. Notices that local air quality has reached “unhealthy for sensitive people” levels are typically issued in the early afternoon after pollutants have been generated and slowly reacted in sunlight to form high concentrations of ozone. In the case of the project, these notices would be issued after the construction workers have arrived at the campus and completed most of their daily work tasks. Therefore, suspending construction activities and sending construction workers home after such notices are issued would not mitigate any anticipated air quality impact within the northwest coastal Los Angeles County area.

Response to Comment 14-12

This comment is acknowledged. The comment indicates that vehicular trips would result “...during the twelve week period of summer construction...” The University assumes this was actually a reference to a twelve-week period of instruction during the summer. The 2002 LRDP Draft EIR indicated that the University would continue four existing programs, practices, and procedures, including maintenance of the trip cap, the parking cap, provision of on-campus housing, and continued implementation of the TDM program, which would serve to reduce impacts. As part of ongoing TDM program, the University annually distributes the UCLA Commuter Guide to every student, faculty, and staff member which encourages individuals to seek ways to reduce the impacts associated with single-occupant vehicles. MM 4.13-2(a) requires that the University expand this education program to include summer session students as part of the registration process (to ensure every enrolled summer student receives the information). In addition to the identification of ATCS as mitigation at selected intersections, the 2002 LRDP Draft EIR also identified feasible mitigation measures at three other intersections, which would involve restriping to provide dedicated turn lanes.

Response to Comment 14-13

Refer to Response to Comment 14-7, which clarifies that the 2002 LRDP did not propose an increase of 5,000 beds in on-campus housing. The significant traffic impact during the summer discussed under Impact LRDP 4.13-2 in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-57 to 4.13-80) is primarily associated with an increase in commuter students. As noted in the 2002 LRDP Draft EIR, summer enrollment would be substantially less than during the regular session. Also as noted, traffic conditions

at most intersections would be better in the summer than the regular session, as shown in Table 4.13-27 (Comparison of Future With Project Traffic Conditions at Selected Intersections) (Volume 1, pages 4.13-78 to 4.13-80). However, the increase in summer enrollment would result in increases in traffic volumes (as represented by a Conditional Movements Analysis, or CMA) which would exceed the identified significance thresholds.

As shown in Table 4.13-7 (Current Parking Allocation—Summer Session [2000]) of the 2002 LRDP Draft EIR (Volume 1, pages 4.13-21 to 4.13-22), only 715 students currently reside in on-campus student residences during the summer, approximately 11 percent of available capacity (which is approximately 6,444 beds, the designed capacity of on-campus residences, as few, if any, triple-occupancy rooms are provided in the summer). Of the approximately 5,729 beds of on-campus housing that are not utilized by students during the summer session, approximately 1,395 conference program attendees reside in the on-campus student residences during the summer. Thus approximately 2,110 on-campus beds are currently occupied during the summer session, approximately 33 percent of the available capacity.

By 2010–11 the available capacity of undergraduate beds would increase by 1,675 beds (due to the concurrently proposed NHIP). As a conservative assumption, based on current occupancy levels, the traffic analysis in Table 4.13-25 (Future Vehicle Trip Generation with 2002 LRDP—Summer Session) of the 2002 LRDP Draft EIR (Volume 1, page 4.13-58) assumed that the number of undergrads housed on campus during the summer would increase to 868 and conference participants would increase to 1,713 individuals. These increases were pro-rated based on the additional supply provided by the NHIP. In addition, it was assumed that 2,000 graduate students would reside in the Southwest Campus Housing and Parking complex during the summer. In total, the traffic analysis in the 2002 LRDP Draft EIR assumed that approximately 4,581 on-campus beds would be occupied during the summer (by undergraduate students, graduate students and conference/summer program participants). Thus, the 2002 LRDP Draft EIR assumed that the number of on-campus residents would more than double (compared to the 2,110 current on-campus residents in the summer).

Although an increase in the utilization of on-campus housing could serve to reduce trip generation (as resident student trip generation tends to be less than commuter students, particularly for undergraduates), the University has no ability to compel students to reside in on-campus housing as a condition of enrollment in the summer. It should be noted that the composition of the student body in the summer is substantially different than during the regular session. As any person with a high school diploma or GED may enroll in summer session, a portion of students in the summer are not regularly enrolled UCLA students. In addition, participation rates for summer session 2002 indicate that over 87

percent of continuing UCLA students enrolled were either upper division undergraduate or graduate students who, due to the current campus housing policy of only guaranteeing on-campus housing to lower division and transfer students, most likely reside year round in off-campus housing. Because of the different demographics of summer students, the University considers it unlikely that a substantial portion of these students would choose to change their place of residence for six weeks (if enrolled in one of the two six-week summer sessions) or up to twelve weeks (if enrolled in both six-week sessions). It is possible that in the future, more regularly-enrolled undergraduate students will choose a year-long housing contract (which may increase the number of student residents in the summer), however, as a conservative assumption, the 2002 LRDP Draft EIR did not make any such assumptions, since year-round on-campus housing assignments are atypical. If State funding incentives continue to be provided for summer instruction, it is possible that increased utilization of on-campus housing could result.

Although the lower total enrollment in the summer (compared to regular session) may suggest that traffic impacts would be less during the summer, implementation of the 2002 LRDP would result in a greater net increase in summer enrollment (of approximately 3,772 students on an average weekday) compared to the regular session (increase of approximately 2,135 headcount students), as discussed in the 2002 LRDP Draft EIR (Volume 1, Section 4.10 [Population and Housing]). Because of the larger net increase during the summer, impacts resulting from increased trip generation would also be greater in the summer than during the regular session. In addition, trip associated with increases in faculty, staff and visitors would also increase vehicle trip generation.

Response to Comment 14-14

This comment suggests discounted housing to promote expanded use of on-campus housing. Refer to Response to Comment 14-13 regarding the feasibility of expanded utilization of on-campus housing during the summer.

As discussed in Response to Comment 14-13, it was assumed that the use of on-campus housing by participants in summer programs would increase from approximately 1,395 to 1,713 individuals. Even with this increase, approximately 5,878 beds of undergraduate housing would remain unoccupied during the summer (8,444 designed beds—with completion of the NHIP—minus 858 students and 1,713 program attendees). Thus, expansion of the number of the undergraduate students housed during the summer could still be accommodated and such an expansion would not be substantially restricted by the continuation of summer programs and conferences. To the extent that student demand for summer housing rises, the campus may reduce the availability of housing for summer conferences and programs.

As with the parking system, the UCLA housing system charges rates for both on- and off-campus housing that cover all operating costs, including debt service for the development and/or acquisition of new housing. Thus, rates for summer housing are established in order to contribute to the overall budget for the housing program. To the extent that rates for summer housing were reduced to below-cost levels, then rates for other housing (e.g., on-campus housing or off-campus rental housing) would have to be increased to support this subsidy. As a self-supporting enterprise, there are no alternative fund sources to subsidize summer housing. The University cannot raise rates for housing without regard to market conditions, in order to keep University-owned housing competitive with the privately-owned rental housing market. Raising rates during regular session could reduce demand and lead to unoccupied rooms (which was a substantial problem during the early 1970s). Thus, the University does not consider it feasible to subsidize summer housing rates. As noted above in Response to Comment 14-13, because of the different demographics of summer students, the University considers it unlikely that a substantial portion of non-UCLA, upper-division undergraduate or graduate students would choose to change their place of residence for six weeks (if enrolled in one of the two six-week summer sessions) or up to twelve weeks (if enrolled in both six-week sessions) in order to attend UCLA during the summer. Although a significant subsidy might increase the participation in summer housing for lower-division undergraduates, the University does not consider such a proposal as fiscally viable, and such increases would be minor in any case.

As noted above in Response to Comment 14-13, the 2002 LRDP Draft EIR did assume an increase of 2,000 graduate student residents in the summer (associated with the Southwest Campus Housing and Parking complex). For the reasons stated herein, the University does not consider the substantial expansion of undergraduate housing during the summer as feasible.

Response to Comment 14-15

The 2002 LRDP Draft EIR acknowledged that campus-related traffic contributes to cumulative traffic conditions at intersections in proximity to the campus, including those 4 intersections that would be significantly impacted during the regular session, with implementation of feasible mitigation measures, as a result of implementation of the 2002 LRDP. See Section 4.13 (Transportation/Traffic) of Volume 1 for a full analysis of the potential for implementation of the 2002 LRDP to impact cumulative traffic conditions.

Response to Comment 14-16

The University acknowledges that previous UCLA projects have impacted the intersection of Sunset Boulevard and Bellagio Way and the community's concerns regarding those impacts. It should be noted that this intersection has recently been improved by widening Sunset Boulevard (on University property)

as mitigation for the Intramural Field Parking Structure project. Refer also to Responses to Comments 14-8, 14-13, and 14-14 regarding the feasibility of the potential mitigation measures identified by the comment. The 2002 LRDP Draft EIR did consider a range of mitigation measures and adopted those that were considered feasible, including programs that promote multi-vehicle ridership and are funded by the University, including vanpools, which are formed in response to demand. Consistent with PP 4.13-1(d), which requires continued implementation of the TDM program, the University will take appropriate actions to respond to increased demand for vanpools and/or carpools.

Response to Comment 14-17

The University acknowledges that previous UCLA projects have impacted the intersection of Sunset Boulevard and Beverly Glen Boulevard. It should be noted the UCLA has previously funded (ATSAC) signal upgrades at this intersection; however, no feasible measures were identified to mitigate the impacts that would result from implementation of the 2002 LRDP at this intersection. Refer also to Responses to Comments 14-1 to 14-16 regarding the feasibility of the potential mitigation measures identified by the commenter in prior comments, including expansion of multiple ridership vehicles including vanpools. The 2002 LRDP Draft EIR did consider a range of mitigation measures and adopted those that were considered feasible, including the continuation of TDM programs that promote multi-vehicle ridership and are funded by the University (via parking fee income).

Response to Comment 14-18

Comment noted regarding the University's commitment to provide its fair share of funds for installation of ATCS at intersections impacted by implementation of the 2002 LRDP. This comment does not identify any specific feasible mitigation measures that might further reduce the project's impact. Refer to Responses to Comments 14-8, 14-13, and 14-14 regarding the feasibility of the potential mitigation measures identified by the commenter in prior comments.

Response to Comment 14-19

The University appreciates the acknowledgement of the award-winning TDM program. This comment does not identify any specific feasible mitigation measures that might further reduce the project's impact. Refer to Responses to Comments 14-8, 14-13, and 14-14 regarding the feasibility of the potential mitigation measures identified by the commenter in prior comments.

Response to Comment 14-20

Refer to Response to Comment 14-11 for a discussion of corporate sponsorship and low-emission vehicle displays. The University regularly sponsors events promoting ridesharing, which often include alternative fuel vehicles provided by manufacturers. The annual distribution of the UCLA Commuter

Guide to every student, faculty, and staff member encourages individuals to seek ways to reduce the impacts associated with single-occupant vehicles. MM 4.13-2(a) requires that the University expand this education program to include summer session students as part of the registration process (to ensure every enrolled summer student receives the information). The University has for many years investigated and utilized alternative fuel vehicles and low-energy consumption vehicles (including electric and natural-gas fueled). UCLA recently announced the gift of 127 electric vehicles from Global Electric Mobilcars, a Daimler-Chrysler company, which will be used as fleet vehicles by the University Housing, Facilities Management and Telecommunication Services departments.

Response to Comment 14-21

As noted in Response to Comment 14-20, the campus already distributes the UCLA Commuter Guide to every student, faculty, and staff member on an annual basis (as noted in the 2002 Draft LRDP EIR, Volume 1, page 4.13-17), which encourages individuals to seek ways to reduce the impacts associated with single-occupant vehicles. The comment is incorrect in claiming that there is no education program for faculty and staff. MM 4.13-2(a) requires that the University expand this education program to include summer session students as part of the registration process (to ensure every enrolled summer student receives the information). Information regarding the TDM program is available on the Transportation Services website and made available via flyers posted on campus bulletin boards. In addition, all ridesharing events are announced via advertisements in the *Daily Bruin*. The comment does not identify any methods to further expand education and awareness of TDM and ridesharing programs beyond those that are already being implemented.

Response to Comment 14-22

The comment states that UCLA has increased the number of outside vendors on campus and has failed to have a university-wide system of purchasing and claims that the number of trips has increased accordingly. Actually, the opposite is true. For the past five years, the University has actively pursued the use of commodity agreements and purchasing software, which consolidate multiple vendors into one contract for various goods and services. This is being pursued to reduce cost, add value to the University purchase of goods and services, and reduce the number of vendors to the smallest number possible. However, no data on the trip generation reduction as a result of these actions is presently available.

Response to Comment 14-23

The University does not monitor the routes that individual drivers utilize to access campus. It is assumed that individual drivers make decisions to avoid congested routes, including drivers of van pools. With 130 active vanpools and a future estimated total of 131,150 campus-related average daily vehicle trips

(with implementation of the 2002 LRDP), it is unlikely that redirecting vans away from individual intersections would substantially reduce traffic congestion at intersections that may be impacted by implementation of the 2002 LRDP given the future traffic conditions that are projected to occur even without the 2002 LRDP. Further, because of the future traffic conditions, redirecting vans could result in new impacts at other intersections, or increase the severity of impacts at intersections that are already identified as being significantly impacted by implementation of the 2002 LRDP.

Response to Comment 14-24

Since inception of the ridesharing programs at UCLA, the number of vanpools and carpools reflect demand for those transportation modes. The 2002 LRDP Draft EIR acknowledged that the TDM program would be maintained (as PP 4.13-1(d)) throughout the 2002 LRDP planning horizon in order to meet the trip reduction and AVR (average vehicle ridership) requirements established by the South Coast Air Quality Management District (SCAQMD). Thus, the campus will continue to respond to changes in demand for vanpools, carpools and other ridesharing programs.

The Metro Rapid bus line (No. 720) along Wilshire Boulevard provides service from Santa Monica to Montebello (via Whittier Boulevard). The line stops at Wilshire Boulevard, which provides relatively convenient access to the campus. In addition, the Campus Express and other public transit lines provide more access to the campus. Information provided by the MTA indicates that Metro Rapid service is generally adequate, and thus no expansion of service is currently planned or warranted. The University has a long history of working with the MTA (and its predecessor, the RTD) and other transit operators regarding service enhancements, such as the extension of new routes to campus. As noted in Topical Response A (BruinGo Program), the MTA, Culver City Municipal Bus Lines and the Los Angeles Department of Transportation declined to participate in the BruinGo pilot program.

As discussed in the 2002 LRDP Draft EIR, the campus already operates a shuttle system that currently provides service to the UCLA Wilshire Center in Westwood Village, and several University-owned off-campus apartment complexes. As noted in the 2002 LRDP Draft EIR, the UCLA campus is already relatively well served by public transit, with eighteen lines that provide service along Wilshire Boulevard, Westwood Boulevard, Le Conte Avenue, Hilgard Avenue, Sunset Boulevard, and Gayley Avenue. With transfers, the UCLA campus can be accessed from large portions of the Los Angeles basin. The campus plans to expand campus shuttle service to the Southwest zone to serve the Southwest Campus Housing and Parking Project when it opens.

Refer also to Response to Comment 14-8 regarding previous experience with shuttles and Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 14-25

The University acknowledges that the community of Beverly Glen is supportive of a shuttle that would connect the San Fernando Valley with West Los Angeles; however, the University is not aware of any funded proposal for such a shuttle operation. The University funds vanpools and other alternative transportation measures as part of its TDM program. See also Response to Comment 14-8 regarding prior experience with shuttle bus operations, which describes UCLA's previous and unsuccessful efforts to establish a shuttle between the Valley and campus.

This comment does not identify construction impacts that warrant mitigation. The 2002 LRDP Draft EIR acknowledged that the delivery of construction materials and removal of construction debris would result in truck trips, and those trips could result in potentially significant impacts along the construction access routes to campus, which include Sunset Boulevard and Wilshire Boulevard (and the intersections between the campus and those Boulevards). No UCLA-related construction-vehicle trips are known or anticipated to occur on Beverly Glen Boulevard. Therefore no LRDP-related construction impacts would occur on Beverly Glen Boulevard and a UCLA financial contribution to a shuttle is not required to mitigate any construction-related impacts.

Response to Comment 14-26

The University acknowledges the Roscomare Valley community wishes to investigate a shuttle. It is not clear whether the commenter believes a shuttle is desirable from the Roscomare Valley area to campus, or whether the commenter seeks to have shuttle service initiated from the San Fernando Valley or elsewhere in order to alleviate impacts on Roscomare Road. As discussed in the 2002 LRDP Draft EIR, no significant traffic impacts would result from implementation of the 2002 LRDP along Roscomare Road, and therefore University participation in a shuttle is not required. However, it should be noted that UCLA has attempted in the past to shuttle commuter students and others by bus from a park-and-ride lot in the San Fernando Valley, a program that was unsuccessful and discontinued due to low participation. See Response to Comment 14-8.

Response to Comment 14-27

The purchase of a speed trailer or LED speed monitoring device would not mitigate any significant impacts that would result from implementation of the 2002 LRDP, and would not reduce the number of vehicle trips. The purchase, installation, or use of speed monitoring devices is within the jurisdiction of the Los Angeles Department of Transportation, not the University, to implement. Further, campus funds would be more effectively used expand or enhance the TDM program, which has the potential to

further reduce campus's related traffic generation. However, the University will work with the BABANC to seek funding from the City of Los Angeles for the purchase of a speed trailer.

Response to Comment 14-28

Inclusion of PP 4-13-3 in the 2002 LRDP Draft EIR commits UCLA Capital Programs to continue the practice of assessing the 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.

As discussed in Response to Comment 4-25, the 2002 LRDP Draft EIR acknowledged that the delivery of construction materials and removal of construction debris would result in truck trips, and those trips could result in potentially significant impacts along the construction access routes to campus, which include Sunset Boulevard and Wilshire Boulevard (and the intersections between the campus and those Boulevards). No UCLA-related construction-vehicle trips or impacts from those vehicles are known or anticipated to occur on either Beverly Glen Boulevard or Roscomare Road.

To the extent that construction-vehicle restrictions are required to reduce potentially significant traffic impacts, such restrictions will be identified in the project-specific CEQA analysis prepared for those projects and have routes defined in construction contracts as feasible and appropriate. Thus, the community will have an opportunity to comment upon such restrictions on a project-specific basis during the public review period for the associated CEQA document.

In accord with the Mitigation Monitoring Program for the 2002 LRDP, monitoring the implementation of this practice will be the responsibility of UCLA Capital Programs.

Response to Comment 14-29

Budget cutbacks that may result from the current fiscal situation of the State of California have no effect on the responsibilities of the University to monitor the mitigation measures identified in the 2002 LRDP Draft EIR. As discussed in the 2002 LRDP Draft EIR (Volume 1, Section 2.5 [Mitigation Monitoring and Reporting Program], pages 2-3 to 2-4)

CEQA requires that a public agency adopt a Mitigation Monitoring and Reporting Program (MMRP) for mitigation measures that have been incorporated into the project to reduce or avoid significant effects on the environment. The MMRP is designed to ensure compliance during project implementation, as required by Public Resources Code Section 21081.6.

This EIR discusses feasible mitigation measures (MMs) that would be implemented to reduce significant environmental impacts. In addition, existing campus programs, practices, and procedures (PPs) that currently reduce environmental impacts will be continued throughout the LRDP planning horizon. The MMRP for the 2002 LRDP, which includes both MMs and PPs, and obligates the

University to implement MMs and continue to follow PPs equally, will be prepared and reviewed by The Regents in conjunction with consideration of the LRDP and certification of the Final EIR.

All mitigation measures (MMs) and campus programs, practices, and procedures (PPs) included in this Final EIR are included in the Mitigation Monitoring and Reporting Program (MMRP), which is included in Chapter IV of this Final EIR.

Since adoption of the 1990 LRDP, UCLA has produced an annual Mitigation Monitoring Report that documents that status of all LRDP and project-specific mitigation measures. All MMs and PPs included in the MMRP adopted by The Regents in conjunction with their consideration of the 2002 LRDP and certification of this Final EIR would be monitored and reported on an annual basis.

Response to Comment 14-30

The University has no authority to close or restrict access to public streets, highways, or freeways or otherwise redirect traffic from those routes. That responsibility lies with public agencies, including Caltrans, the Los Angeles Department of Transportation, the California Highway Patrol, the Los Angeles Police Department, and the Los Angeles County Sheriff's Department. As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-86 to 4.13-87), the 2002 LRDP will not result in inadequate emergency access.

To the extent that the responsible agencies notify the University Police of road closures or other emergency conditions, to the extent feasible, the University Police will notify the campus population (e.g., via e-mail) of such conditions that require the use of alternative routes.

Response to Comment 14-31

The 2002 LRDP Draft EIR considered a range of mitigation measures and adopted those that were considered feasible, including programs that promote multi-vehicle ridership that are funded by the University. The 2002 LRDP Draft EIR also discussed a range of mitigation measures that were determined infeasible, including specific measures at each and every intersection that would be significantly impacted by traffic associated with implementation of the 2002 LRDP. This comment does not identify for evaluation any other feasible mitigation measures that might further reduce impacts. Refer to Responses to Comments 14-1 to 14-30 regarding the feasibility of the potential mitigation measures identified by the commenter in prior comments.

Response to Comment 14-32

As noted in Response to Comment 14-28, no construction-vehicle trips are anticipated to occur on either Beverly Glen Boulevard or Roscomare Road, and thus, no LRDP-related impacts would occur. Refer to Response to Comment 14-28 regarding construction-vehicle restrictions.

Response to Comment 14-33

The 2002 LRDP Draft EIR acknowledges that implementation of the 2002 LRDP would result in an increase of approximately 1,327 daily trips during the regular session and approximately 10,394 daily trips during the summer session, and that these increases in vehicular traffic would result in potentially significant impacts and that no feasible mitigation measures had been identified to reduce impacts at four intersections during the A.M. peak hour for the regular session, and twelve intersections during both the A.M. and P.M. peak hours for the summer session.

For those intersections that would be significantly impacted by implementation of the 2002 LRDP, future traffic conditions would vary from Level of Service (LOS) D to LOS F. For those intersections for which the future LOS would be at D or E, traffic conditions would continue to operate at levels that are within the theoretical design capacity of the roadways (as indicated by a Conditional Movements Analysis [CMA] value less than 1.0). Those intersections where the future LOS would be at LOS F (indicating a CMA value above 1.0), despite that traffic volumes would exceed the theoretical roadway capacity, traffic would continue to move along those roadways, albeit with significant delays (as evidenced by current traffic conditions along stretches of Wilshire and Santa Monica Boulevards, where traffic conditions are already at LOS F.) Emergency vehicles can, and do, traverse roadways in the Westwood area, including those that operate at LOS D, E, or F, generally by requiring vehicles to move over in order for the emergency vehicles to pass through. On some occasions, because of extended congestion, emergency vehicles occasionally cross to opposing traffic lanes (e.g., to travel westbound in eastbound traffic lanes). Thus, the operation of emergency vehicles does not adhere to standard vehicular travel patterns. The ability of emergency vehicles to use the median, a bicycle lane, or travel opposed to traffic cannot be modeled with standard traffic models. The University is unaware of any modeling or analytical technique that can accurately predict the ability of emergency vehicles to traverse impeded traffic conditions, including traveling opposed to traffic. Because the operation of emergency vehicles is controlled by individual operators, predicting the relative propensity of those operators to make certain decisions about how to traverse congested roadway segments would be speculative and thus is not required by CEQA.

Although implementation of the 2002 LRDP would contribute additional vehicle trips to already congested roadways, as shown in the Traffic Technical Appendix (Volume 1a, Appendix 4, page 87, Figure 10(a)), the increase in campus-related traffic would be relatively minor at the four intersections that would be significantly impacted during the A.M. peak hour for the regular session, as summarized below.

	<i>Intersection</i>	<i>Net Increase in A.M. Peak Hour Trips</i>
5	Sunset Boulevard and Veteran Avenue	43
6	Sunset Boulevard and Bellagio Way	36
14	Montana Avenue and Levering Avenue	18
36	Wilshire Boulevard and Veteran Avenue	57

It is unlikely that the addition of up to 57 vehicles over a one-hour period would substantively impede the ability of emergency vehicles to traverse any of the significantly impacted intersections during the regular session.

Although more intersections would be impacted by implementation of the 2002 LRDP during the summer session, those impacts occur at a time when overall traffic volumes (prior to mitigation) are approximately 3.7 percent lower than during the regular session, per Table 4.13-27 (Comparison of Future With Project Traffic Conditions at Selected Intersections) (Volume 1, pages 4.13-78 to 4.13-80). Thus, the projected increases in campus-related traffic volumes during the 12-week period of summer instruction are unlikely to substantively impede the ability of emergency vehicles to traverse any of the significantly impacted intersections during the summer session.

Although emergency vehicles may experience additional delays as a result of the significant traffic impacts at some intersections, the 2002 LRDP Draft EIR (Volume 1, page 4.13-87) concluded:

...implementation of the 2002 LRDP would not result in a substantive increase in traffic volumes that would impede the ability of emergency vehicles to provide emergency police, fire, or medical services...

The University acknowledges that in some instances, individual vehicles do not appear to conform to the legal requirement of pulling to the right and stopping for emergency vehicles, and that loud music or the use of cellular phones may on occasion interfere with the ability of drivers to be alerted by emergency vehicle sirens. Enforcement of the legal requirements regarding yielding the right-of-way to emergency vehicles is the responsibility of law enforcement agencies, including the Los Angeles Police Department and California Highway Patrol.

Response to Comment 14-34

Refer to Response to Comment 14-30 for a discussion of emergency access.

Response to Comment 14-35

As noted in the 2002 LRDP Draft EIR (Volume 1, page 4.11-5):

Within a one-mile radius of University-owned property, the UCPD has concurrent jurisdiction with the Los Angeles police department (LAPD).

(Volume 1, page 4.11-6):

The LAPD has the primary responsibility for providing police protection to the neighborhoods adjacent to the campus.

Thus, although the UCPD has concurrent jurisdiction in those areas in proximity to the campus, that jurisdiction is limited to a one-mile radius of campus, not a five-mile radius as noted in the comment, and, further, the Los Angeles Police Department has primary responsibility for providing police protection services, including responses to emergencies for off-campus areas.

As noted in the 2002 LRDP Draft EIR (Volume 1, page 4.11-9):

...the UCLA Police Department will continue its current practice of cooperating with the Los Angeles Police Department, Santa Monica Police Department, and the California Highway Patrol to help ensure the adequacy of police protection services for the campus.

Thus, the UCPD can and does coordinate with relevant police agencies regarding the provision of police protection services and has coordinated response with those agencies. To the extent that such agencies request assistance, the UCPD will provide assistance, consistent with the UCPD's authority.

The UCLA *Emergency Response Plan* provides that if responsible agencies notify the University Police of road closures of other emergency conditions, to the extent feasible, the University Police will notify the campus population (e.g., via e-mail) of any such conditions, including whether such conditions warrant the use of alternative routes. Therefore, all appropriate and feasible measures are and will continue to be implemented to ensure the safety of campus residents and visitors.

Response to Comment 14-36

The campus has in place a policy of coordination with local law enforcement, with concurrent jurisdiction with the LAPD within a one-mile radius of campus, as noted above. UCLA is part of the Los Angeles County-wide Emergency Mutual Aid Program. In that capacity, UCPD routinely meets with the representatives of local area police departments, including the LAPD, to ensure that emergency plans are coordinated and access is maintained. The UCLA *Emergency Response Plan* provides for cooperation with the LAPD, Santa Monica Police Department, and the California Highway Patrol to ensure the adequacy of police protection services for the campus, which includes emergency response procedures. This policy of cooperation is embodied within the *Emergency Response Plan* and shall continue to be implemented throughout the planning period of the 2002 LRDP.

Response to Comment 14-37

The campus regularly provides traffic control personnel, which may include UCPD officers, for on-campus special events. The campus will employ appropriate traffic control measures for special events

or Sig-Alerts⁴ in the immediate vicinity of the campus that could affect traffic conditions on campus, to the extent the responsible agencies provide notification to the UCPD. Also see Responses to Comments 14-35 and 14-36 above.

Response to Comment 14-38

UCLA is part of the Los Angeles County-wide Emergency Mutual Aid Program. In that capacity, UCPD routinely meets with the representatives of local area police departments, including the LAPD, to ensure that emergency plans are coordinated and access is maintained.

Response to Comment 14-39

The campus currently prepares a detailed annual Mitigation Monitoring Program Status Report, which is available for review at UCLA Capital Programs. The data provided in the status reports are collected over the course of the academic year and most of the data are annual in nature and are not available and cannot be assessed on a quarterly basis. Additionally, the data collection effort for these status reports constitutes a substantial effort and involves a substantial time and resource commitment, which does not allow quarterly or monthly preparation or distribution of such reports.

Response to Comment 14-40

An independent "compliance officer" is not required by CEQA or the *CEQA Guidelines*. Further, although the activities that are reported in the plan are compiled by Capital Programs, these activities are conducted and monitored by numerous University departments, and the responsible members of these departments are experts in their field and are best qualified to evaluate the effects of the mitigation measures implemented by their respective departments. A "compliance officer" would not necessarily possess the necessary expertise in each required discipline to provide an informed review of the effectiveness of each of the mitigation measures implemented. The addition of a compliance officer would merely represent the introduction of an additional administrative step in the production of the Mitigation Monitoring Program Status Report, and would not improve the efficiency or effectiveness of mitigation measures proposed in the 1990 and 2002 LRDP EIRs, nor would such an officer render such measures more enforceable.

Response to Comment 14-41

The University provides copies of the annual Cordon Count to the Los Angeles Department of Transportation as required by the terms of the Traffic Mitigation Monitoring Agreement, as well as the Fifth Council District. The document is available to others upon request.

⁴ Defined by Caltrans as any traffic incident that will tie up two or more lanes of a freeway for two or more hours.

Response to Comment I4-42

To assess cumulative traffic conditions, the 2002 LRDP Draft EIR included a list of off-campus related projects and on-campus projects that might result in additional vehicle traffic within the project study area. The list of off-campus related projects and their characteristics was provided in Table 4.13-15 (Off-Campus Related Projects) (Volume 1, pages 4.13-29 to 4.13-30), and was based upon information provided by the Los Angeles Department of Transportation, based upon those projects for which the permit application process had been initiated. The list of UCLA projects was provided in Table 4.13-16 (UCLA Projects) (Volume 1, page 4.13-32).

Because the planning horizon of the 2002 LRDP extended to the 2010–11 academic year, to account for the potential effects of local and regional growth that could occur from known and probable projects, the traffic analysis also incorporated growth projections (for the year 2011) from the transportation model developed by the Southern California Association of Governments.

Response to Comment I4-43

Although the Stone Canyon Reservoir Water Quality Improvement Project could result in construction related vehicle trips, the project is proposed to be completed by June of 2006. The traffic analysis in the 2002 LRDP Draft EIR assessed potential future traffic conditions that would result from implementation of the 2002 LRDP in the year 2011 (to reflect conditions that would occur during the 2010–11 academic year). Because the Stone Canyon project would be completed by 2006, construction-related vehicle trips would have no effect on traffic conditions in the year 2011. The NHIP is projected to be under construction during the period of approximately winter or spring of 2003 to the fall or winter of 2007, during which time the Stone Canyon project could be under construction. Construction vehicle trips related to the NHIP would be limited to Sunset Boulevard and other streets adjacent to the campus, and would not travel on any roadways to the north of campus, such as Roscomare Road, Beverly Glen Boulevard or Mulholland Drive. Construction vehicles related to the Stone Canyon project would access the site from the north, and would use Mulholland Boulevard. Therefore, no construction-related impacts are anticipated to occur despite the overlap in construction of the two projects. The NHIP would be completed by winter 2007; therefore traffic associated with construction of the Stone Canyon Reservoir Water Quality Improvement Project would not contribute to cumulative traffic conditions when the NHIP is completed.

Response to Comment I4-44

The list of Off-Campus Related Projects included in the 2002 LRDP Draft EIR in Table 4.13-15 (Off-Campus Related Projects) (Volume 1, pages 4.13-29 to 4.13-30) was based upon information provided

by the Los Angeles Department of Transportation, based upon those projects for which the permit application process had been initiated. This list did include the proposed Harvard Westlake Middle School project, and indicated that the proposed project would result in a net increase of 24 students and 15 staff, not just 15 students as suggested by the comment. Thus, the traffic analysis in the 2002 LRDP Draft EIR did include the potential traffic effects from an increase in both students and faculty/staff, and accounted for any potential cumulative effects related to the school expansion project on Beverly Glen Boulevard and the intersection of Beverly Glen Boulevard and Greendale Drive.

Response to Comment 14-45

Although the conversion of the Bellagio Road School to magnet or charter status may result in a change in student travel patterns, the University is not aware of any decision by the Los Angeles Unified School District to eliminate bus service to charter or magnet schools. The district is restricted by the education code to limit the transportation of students via bus to trips that are less than 75 minutes. There is no evidence that the Bellagio Road School cannot continue to be serviced by school buses even with the proposed change in status. The potential for individual parents to rely upon private vehicles, instead of school buses, for transport of children to and from the Bellagio Road School is speculative, and thus inclusion of such scenarios in the 2002 LRDP Draft EIR is not required.

As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-7):

The traffic impact analysis performed by Crain & Associates examined study intersections within the area surrounding the UCLA campus that would most likely be affected by vehicle trips generated as a result of the implementation of the 2002 LRDP. In order to be consistent with the prior analysis performed in the 1990 LRDP, the traffic study for the 2002 LRDP incorporated in its analysis a detailed evaluation of existing and future traffic conditions at the same fifty-two study intersections that were addressed in the 1990 LRDP traffic study. In addition, six intersections located north of Sunset Boulevard have also been incorporated in this study, for a total of fifty-eight study intersections.

The intersection of Sunset Boulevard and Glenroy Avenue was not included as a study intersection because the intersection does not provide direct access to or from the UCLA campus, and therefore is unlikely to be affected by implementation of the 2002 LRDP.

Response to Comment 14-46

As noted in the Traffic Technical Appendix to the 2002 LRDP Draft EIR (Volume 1a, Appendix 4, page 62):

...the [traffic] model was further refined to account for future highway improvements, so that future traffic conditions reflect those improvements. This includes only those improvements now under construction or for which implementation is reasonably assured (e.g., already funded, or included in an adopted transportation program). These improvements include provision of High-Occupancy Vehicle (HOV) or "carpool" lanes on the San Diego Freeway, as well as those programmed for the Golden State, Hollywood, and Antelope Valley Freeways. Surface street improvements include the addition of

a reversible lane on Sepulveda Boulevard north of Wilshire Boulevard, and the Santa Monica Transitway improvements.

Thus the traffic analysis in the 2002 LRDP Draft EIR did account for the effects of the Santa Monica Boulevard Transitway renovation project.

Response to Comment 14-47

As discussed in Response to Comment 14-43, the traffic analysis in the 2002 LRDP Draft EIR assessed potential future traffic conditions in the year 2011 (to reflect conditions that would occur during the 2010–11 academic year). The construction of the Benedict Canyon Low-Flow Storm Drain project is scheduled to be completed during 2003, with related work (including a water line and street reconstruction) completed during 2004. Construction-related traffic impacts of the project would not affect any intersections in the study area in the year 2011.

Response to Comment 14-48

As described by the comment, significant, unavoidable impacts have been identified in the EIR prepared for the proposed projects, which require the University to adopt a Statement of Overriding Considerations, pursuant to Section 15093(b), if the projects are approved. Please refer to Responses to Comments 14-3 through 14-47 for discussions regarding the issues raised by the comment regarding impact analysis and the feasibility and effectiveness of the mitigation measures proposed.

FAX

Comment Letter 15

UCLA ASTRONOMY
8370 Mathematical Sciences
LOS ANGELES, CA 90095-1562

Date 2002-12-20

Number of pages including cover sheet 3

To:

Environmental planning
Capital Programs
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Phone +1-310-206-7278

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CC: _____

From:

Dr. Philippe P. Brien

Phone # -(310) 206-8596

Fax Phone # -(310) 206-2096

REMARKS:

☒ Urgent

☒ For your review

☐ Reply ASAP

☐ Please comment

Comments on 2002 LRDP & EIR.
Will call you to confirm fax reception.

COMMENTS ON DRAFT 2002 LONG RANGE DEVELOPMENT PLAN.

Before going into my actual comments, I would like to point out a factual error in Appendix B. The Physics & Astronomy building (under construction) is listed in the northern half of the Core zone, but it should be in the southern one (since it is located between Moore and Knudsen Hall, both of which are in the southern half).

While I think that the LRDP generally goes in the right direction, there are a few areas of concern.

The Bridge zone definition strikes me as artificial; a convenient way of connecting the otherwise-disjoint Southwest zone from the "main" campus. Indeed, the Ueberroth building really belongs in the Health Sciences zone by both geography (see how its location was carved out of the bottom left of Figure 10) and functionality. In addition, there are other UNEX buildings throughout Westwood Village that are not part of any of the campus zones discussed in this LRDP. Finally, the University housing buildings are clearly a mismatch with the previous two buildings in their functionality--unlike those in the other zones--and would therefore have a more logical home at the north end of the Southwest zone.

The development plans for the Core Campus zone emphasize the desire to preserve open areas. However, experience from current development projects in the southern end of that zone shows that those areas and related landscaping are killed without hesitation by Capital Programs. On the other hand, so-called preserve areas (e.g. Dickson Court) are hardly ever used by the campus community. Hopefully, future development in the Core zone can be focused on larger areas like Dickson Court and the sculpture garden, without further massacre of the heavily-used Court of Sciences.

Incidentally, I am bewildered by the fact that the water storage tank project in the southwest corner of the Court of Sciences is not mentioned at all in this report. The giant hole in the ground that has been opened for over a year with nothing happening to it since is a major eyesore and is likely to continue for a year or two more (at least).

Another area that this LRDP fails to address the situation of the Wilshire Center (10920 Wilshire Boulevard), which houses many UCLA administration departments over a large gross square footage. Smaller omissions include the faculty apartments at 715 Gayley, the Bank of America tower (medical administrative offices) on Westwood Boulevard, the Geffen playhouse (theater) on Le Conte Avenue, Tiverton House (hospital residence) on Tiverton Drive, and the Hammer museum on Wilshire Boulevard. Stunning!

One last consideration is that the UCLA hospital system is moving several of its outpatient clinics to its Santa Monica annex. This must have some impact on visits from the public to the Health Sciences zone...

Finally, a meta comment on this LRDP. I think that it is short sighted to establish a 10-year plan based on expected student enrollment on that horizon, without considering the longer term picture. Because of the region's demographics, student enrollment demand is going to continue increasing. If the use of campus space is optimized for the anticipated situation in 10 years, similar or worse problems will be faced then.

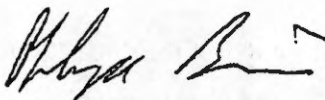
The fact is that campus space is physically limited. Unless UCLA is turned into a collection of downtown-like skyscrapers (as opposed to the collection of mid-rise buildings that it is now), there will not be enough space to accommodate all the desired population in a pleasant way fairly soon. So maybe UCLA should start working on planning the physical expansion of its campus or reconsider the move away from a commuter campus...

COMMENTS ON DRAFT 2002 LONG RANGE DEVELOPMENT PLAN EIR.

Consistent with the conclusion of my comments on the DRAFT 2002 LONG RANGE DEVELOPMENT PLAN [above], and considering the conclusions of this EIR, I recommend that alternative 2 (off-campus site) be pursued instead of the proposed NHIP.

15-10

Dr. Philippe P. Brieu
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Disclaimer: The views expressed in this message are my own and in no way represent those of my group/division/department/college or UCLA. I am speaking as an individual who happens to be part of the UCLA community, but not in an official capacity as part of my job duties.

15-11

Response to Comment Letter 15

Facsimile from Phillippe P. Brieu, dated December 20, 2002

Response to Comment 15-1

In response to this comment, on page B-2 of the 2002 LRDP, the entry for the Physics and Astronomy Building will be moved from the "Under Construction" category in the Core (North) zone to page B-3, in the "Under Construction" category in the Core (South) zone.

Response to Comment 15-2

This introductory information in this comment is acknowledged. Please refer to Responses to Comments 15-4 to 15-10 for discussion regarding the environmental issues raised by the comment.

Response to Comment 15-3

The comment is acknowledged. Pursuant to CEQA, the purpose of the 2002 LRDP EIR is to evaluate the significance of physical changes in the environment resulting from approval of the 2002 LRDP. See, for example, *CEQA Guidelines* Section 15064(d). See also *CEQA Guidelines* Section 15358(b) (impacts analyzed in an EIR must be "related to a physical change" in the environment). Because this comment does not address a physical change in the environment that could result from approval of the 2002 LRDP, it does not relate to the subject matter of the 2002 LRDP Draft EIR and thus no response is required. See *CEQA Guidelines* Section 15088 (lead agency shall prepare responses to comments on "environmental issues"). The UNEX buildings described by the comment are located outside of the geographical area covered by both the 1990 and 2002 LRDPs. For this reason, the use of these buildings is not, and need not be, addressed in the context of the 2002 LRDP Draft EIR, since they are not physically located within the LRDP area. Moreover, the operation and use of these facilities will not be affected by the 2002 LRDP.

Response to Comment 15-4

Four projects are currently under construction in the Court of Sciences, and are anticipated to be complete in 2005-06, at which time access through and within the Court of Sciences will be restored, as well as landscaping and other improvements.

As noted by the comment, Dickson Court and the Franklin D. Murphy Sculpture Garden are designated in the 2002 LRDP as open space preserves (see page 17 and Figure 3 [UCLA Open Space Areas] of the 2002 LRDP), due to their "exceptional level[s] of spatial and aesthetic excellence and their cherished places in campus history and tradition," and would not be subject to development under the 2002 LRDP. As described on page 15 of the 2002 LRDP:

Open space is an essential component of the aesthetic and social life of the campus. Of the total campus area of 419 acres, approximately 152 acres (36 percent) consist of green space.

As further described in the 2002 LRDP Draft EIR (Volume 1, page 4.1-26), “preserving open spaces and integrating landscaping with development is also intended to enhance campus linkages by seamlessly integrating hardscape and landscape,” and the preservation of these features and spaces that are accepted as valuable visual elements of the campus help to ensure that development under the 2002 LRDP does not degrade the visual character of the campus or the immediately surrounding area. Development within these areas would not be feasible, because it would result in significant and unavoidable aesthetics impacts by eliminating significant aesthetic resources. Cultural resources impacts would also occur, as development in these areas—which were designed as open space areas as part of Kelham’s bi-axial campus design (refer to Volume, 1, pages 4.4-1 and 4.4-2 for discussion of campus development history), and development in these areas would compromise the setting of the historic campus core by substantially altering the historic pattern of development.

Response to Comment 15-5

The 2002 LRDP Draft EIR (Volume 1, page 4.14-31) states that the Thermal Energy Storage System (TES) became operational in August 2002. The original site was excavated in spring 2001. During site excavation, the TES was redesigned to increase its capacity to hold chilled water. At the same time, the location of the TES was shifted approximately 50 feet south from the original site to accommodate a different project, the California NanoSystems Institute (CNSI) Building. The remaining excavated site will be used as part of the basement of the new CNSI Building, which is anticipated to begin construction in winter 2003.

The TES and CNSI Building were fully analyzed and disclosed in the Luck Research Center and Related Facilities Final Environmental Impact Report (SCH #2000011099, May 2000), as addended, and the NanoSystems and Engineering Facilities Plan Final Environmental Impact Report (SCH No. 2001121064, July 2002), respectively. Because these projects were analyzed and approved prior to issuance of the Notice of Preparation for the 2002 LRDP Draft EIR, they are considered part of the existing environmental setting and, therefore, are not part of the future development proposed under the 2002 LRDP.

Response to Comment 15-6

The LRDP for the UCLA campus (both the existing 1990 LRDP and the proposed 2002 LRDP) govern campus growth and development within the geographical area defined as the UCLA campus, which is shown on Figure 3-3 (Project Site) of the 2002 LRDP Draft EIR (Volume 1, page 3-5). The Wilshire Center building, located at 10920 Wilshire Boulevard, is located outside of the geographical area covered

by both the 1990 and 2002 LRDPs. For this reason, the use of the Wilshire Center building is not addressed in the context of the 2002 LRDP Draft EIR, since it is not physically located within the LRDP area.

Like the Wilshire Center property, the other facilities referenced by the Comment (the 715 Gayley Drive apartments, the Bank of America tower on Westwood Boulevard, the Geffen Playhouse, the Tiverton House, and the Armand Hammer Museum) are located off-campus and outside the scope of the 2002 LRDP. Moreover, the operation and use of these facilities will not be affected by the 2002 LRDP.

Response to Comment 15-7

In 2001–02, the Family Health outpatient program began a several year process of relocating provision of service from the 200 Medical Plaza Building to the Les Kelley Family Health Center affiliated with the Santa Monica–UCLA Medical Center in Santa Monica. By 2005–06 it is anticipated that a large part of the UCLA inpatient and outpatient orthopedic service program will relocate to the Santa Monica–UCLA Medical Center and Orthopaedic Hospital upon its completion. Both relocations have been accounted for in the campus population projections (“other individuals” category) included in the 2002 LRDP (Tables 6 and 7), and 2002 LRDP Draft EIR (Volume 1, pages 4.10-9 and 4.10-10, Tables 4.10-7 and 4.10-8). In addition, impacts associated with the hospital were fully analyzed and disclosed in the Academic Health Facilities Reconstruction Plan Final Environmental Impact Report (SCH No. 97061016, November 1998).

Response to Comment 15-8

The ten-year planning horizon relates to the time period during which the additional 4,000 full-time-equivalent students would be accommodated at UCLA. Whether the on-campus population would grow or decline beyond that planning horizon, and by how much, is speculative.

Response to Comment 15-9

The fact that the campus is physically limited is acknowledged in the 2002 LRDP Draft EIR (Volume 1, Section 3.3.2 [Physical Objectives], page 3-6), which states objectives that the campus shall “[s]ite and design facilities to enhance spatial development of the campus while maximizing use of limited land resources,” and that the campus shall “[c]ontinue the infill development of the UCLA campus...” Further, the 2002 LRDP strives to “[d]evelop on-campus housing to enhance the educational experience for students and continue the evolution of UCLA from a commuter to a residential campus.” Nonetheless, there has been, and will continue to be, leasing and potential acquisition of off-campus facilities to accommodate uses that support UCLA’s academic, research, and/or public service mission, including, but not necessarily limited to, housing, research, and medical centers.

If UCLA did not increase on-campus housing (or, according to the comment, “reconsidered the move away from a commuter campus”), student-related vehicle trips would actually increase and traffic impacts would increase. Therefore, the continuation of UCLA as a commuter campus is not a feasible alternative to the proposed project.

The 2002 LRDP is the land use plan that guides the physical development of the campus. Further, the 2002 LRDP proposes to accommodate the increase in 4,000 full-time-equivalent students, and associated academic/staff employees and visitors, while maintaining the same campuswide development allocation, vehicle trip limits, and parking limits of the 1990 LRDP.

Response to Comment 15-10

This comment is acknowledged. The opinion of the comment will be provided to The Regents for their review and consideration as part of this 2002 LRDP Final EIR.

Response to Comment 15-11

This comment is acknowledged.

THE URBAN WILDLANDS GROUP, INC.

P.O. BOX 24020, LOS ANGELES, CALIFORNIA 90024-0020, TEL (310) 276-2306

PROJECT ACCOUNTING
02 DEC 20 PM 3:53

December 20, 2002

Tova Lelah, Assistant Director
UCLA Capital Programs
1060 Veteran Avenue, Box 951365
Los Angeles, CA 90095-1365

Re: 2002 LRDP DEIR

Dear Ms. Lelah:

The Urban Wildlands Group is a Los Angeles-based conservation organization with long-standing ties to the UCLA campus. Four of seven board members of The Urban Wildlands Group are alumni of UCLA (Mattoni, Heinrich, Rich, Longcore), earning degrees in Biology, Law, and Geography, from the 1950s to the 1990s. Two board members (Mattoni, Longcore) lecture as needed at UCLA, including for the Department of Geography, Department of Organismic Biology, Ecology, and Evolution, and the Institute of the Environment. The comments in this letter are based on expert opinion, and extensive experience with the UCLA campus, including service on Academic Senate committees, and longstanding participation in campus construction issues.

We present here a series of quotations from the DEIR, with our comments following.

p. 3-17: "All of the plant life on the UCLA campus has been introduced along with the development of buildings, and the majority of the vegetation consists of nonnative rather than native species."

Not all of the plant life on the UCLA campus has been introduced along with buildings. In certain areas of campus, plant communities present before the construction of the campus persist. For example, at the University Residence the coast live oak trees (*Quercus agrifolia*) at the northern portion of the site were present before the campus was developed. These trees are visible in historical aerial photographs of the campus site that can be seen at UCLA's own Spence Air Photo Collection, housed in the Department of Geography. Another example is the coastal sage scrub habitat found in the northwestern portion of the campus. Some of the slopes have not been significantly disturbed and still support native grasses and shrub species.

p. 4.1-2: "The UCLA campus was originally located on a treeless, chaparral-covered site."

We have conducted extensive research on the historic vegetation conditions on the UCLA campus, and this was also the subject of a Masters thesis in Geography in the 1970s. The campus was not covered with chaparral when first developed. All available evidence, including the eyewitness observations of the faculty at the time, indicate that a number of natural communities

were found on site. Coastal sage scrub was found on slopes, especially in the northwestern portion of the campus, known at the time as "Faculty Ridge." Native and nonnative grasslands were found on both what is now the core campus, and the northwest portion of campus. Stone Canyon Creek, and Dry Creek (on the campus's western edge), supported riparian vegetation, as well as an oak woodland on the slopes above Stone Canyon Creek. Where Stone Canyon Creek emptied onto the alluvial plain that is now developed into athletic fields there were freshwater wetlands. These are clearly documented by the bird observations of Loye Miller, Professor of Zoology. His original note cards and subsequent publications describe the presence of wetland and riparian dependent birds in this portion of campus. The arroyo on the eastern part of the campus, of which the botanical garden is the only remaining remnant, contained coastal sage scrub, and some mesic plant species such as Mexican elderberry (*Sambucus mexicana*). The EIR should amend its description of campus site to reflect accurately the historical environmental context.

p. 4.1-2: *"and all vegetation has been introduced coincident with the development of buildings."*

This statement should be modified to state that "most" vegetation has been introduced.

Figure 4.1-1.: Open space and pedestrian pathways.

The figure depicting campus open spaces conspicuously omits the four-acre area between Lot 11 and the Child Care Center, much of which is covered by the Stipulated Agreement. This is clearly an important open space on the campus, and deserves to be described on this figure. The EIR should also acknowledge that this site has a history of use for research and teaching and is currently receiving extensive use as an instructional site for courses in Geography, Organismic Biology, Ecology, and Evolution, and for the Institute of the Environment. This open space receives more official University instructional use than other areas depicted on the map and should therefore be added to the map.

p. 4.1-11: *"The edges of the campus are planted with mature eucalyptus, Canary Island pines, and camphor trees that enhance the visual quality of the campus borders."*

This statement no longer describes the campus edge along Sunset Boulevard adjacent to UES. With the cutting of the DAR eucalyptus in this area, the parking lot along this border was expanded at the expense of the landscaped border that was once found here. With the narrowed planting area, this part of the campus border is left open to Sunset Boulevard, and the immature landscaping does not provide a significant buffer to the road. Because of the lost landscaping area, it can never provide the same quality buffer as previously present. The EIR should reflect these changed conditions.

PP 4.1-2(e): *"The western, northern, and eastern edges of the main campus shall include a landscaped buffer to complement the residential uses of the surrounding community and to provide an attractive perimeter that effectively screens and enhances future development. (This is identical to Land Use PP 4.8-1(c).)"*

The narrowing of the landscape area to construct additional parking adjacent to UES has precluded the implementation of this directive along this portion of the northern campus border.

p. 4.1-17: "The UCLA campus utilizes a design review process for all campus development projects prior to approval. This design process is performed through various campus committees..."

Because the EIR relies on the design review process to ensure that future development will be aesthetically compatible, this process should be much more fully described. Particularly, what committees review designs for proposed development? What is the make-up of these committees? Are there staff representatives on the committees? Are there community representatives on the committees? Are committees consulted before project design, or presented with designs and asked to comment? Are occupants of buildings adjacent to development projects consulted prior to project design? What avenues for public participation in the design process are available in addition to those legally required by CEQA?

PP 4.1-1(b): "The Mildred E. Mathias Botanical Garden, Franklin D. Murphy Sculpture Garden, Dickson Plaza, Janss Steps, Stone Canyon Creek area, Meyerhoff Park, Wilson Plaza, Bruin Plaza, and the University Residence shall be maintained as open space preserves during the 2002 LRDP planning horizon."

Why has the four-acre open space in the Stipulated Agreement area not been designated as an open space preserve? The DEIR describes no current or future plans to develop in this area. It is currently used by hundreds of undergraduate students studying environmental sciences. What logic was used to pick the open space preserves described, and not others? What campus committee was consulted to develop the list of open space preserves?

MM 4.1-2: "In conjunction with CEQA documentation required for each project proposal under the 2002 LRDP, a tree replacement plan shall be prepared and implemented. The tree replacement plan for each project shall determine the appropriate number of replacement trees in relation to the specific project site characteristics. The tree replacement plan would ensure that the appropriate number of new trees is planted within the available site area so that each tree planted has sufficient space to grow and thrive. (This is identical to Biological Resources MM 4.3-1(c).)"

This mitigation measures is significantly different from the measure found in the 1990 LRDP, which required a 1:1 tree replacement ratio. This mitigation measure seems to acknowledge that the campus is so overdeveloped that a 1:1 tree replacement ratio is no longer possible without crowding trees too closely to survive. With this mitigation measure, the number of trees on campus could decrease significantly. Because no replacement ratio is specified, significant habitat for raptors and migratory birds will be lost. This mitigation measure is therefore insufficient to offset the impacts for which it was designed. Two options are available to address the underlying impact. First, retain the 1:1 tree replacement ratio established in the 1990 LRDP. Second, set aside certain areas of campus most important to migratory birds and raptors as permanent open space areas, and manage those areas for biological resources. We request that the Stipulated Agreement area that is currently undeveloped (i.e., not used by Facilities), be set aside as a mitigation area to offset the impacts of campus urbanization and loss of trees on migratory birds and raptors. This site is already the most significant area of campus for bird and vertebrate diversity (the other significant areas are the University Residence, Stone Canyon Creek, and the

Botanical Garden). The only feasible mitigation measure to offset the loss of trees from the LRDP and the Northwest Housing Infill Project is to enhance wildlife habitat in another location, and to protect it in perpetuity.

16-10

PP 4.1-2(b): "The architectural and landscape traditions that give the campus its unique character shall be respected and reinforced. (This is identical to Land Use PP 4.8-1(f).)"

16-11

We have found that recent landscape architecture decisions have not respected campus traditions. Please see attached report.¹

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."

16-12

This mitigation measure should be written in terms that are enforceable and can be written into design standards. For example, all walkway, street, and other nonrecreational lighting fixtures should be fully shielded, meaning, "fixtures that are shielded in such a manner that light emitted by the fixture, either directly from the lamp or indirectly from the fixture, is projected below a horizontal plane running through the lowest point on the fixture where light is emitted." The EIR should also establish performance standards for maximum illumination and luminance levels that must be met by campus lighting when observed from off-campus or sensitive on-campus receptors such as offices and residences.

p. 4.3-1: "The comment letter from The Urban Wildlife Group, Inc. requested that the EIR address potential impacts to wildlife."

16-13

Please correct the name of our organization to "The Urban Wildlands Group, Inc."

p. 4.3-1: "According to a search of the California Natural Diversity Database System (CNDDDB; CDFG 2001), no special-status plant species or communities have been reported on the campus, and none were observed during biological surveys conducted by EIP Associates on December 5, 2001, and April 22, 2002."

16-14

Coastal sage scrub found in the Stipulated Agreement area, albeit degraded, is recognized as a sensitive habitat by the California Department of Fish and Game. Further discussion of this habitat is found below.

16-15

p. 4.3-1: "all of the vegetation has been introduced along with the development of buildings."

16-16

Change "all" to "most."

¹ In this report, we suggest the use of *Eucalyptus* spp. not be precluded from the UCLA campus. Subsequently, information was published implicating certain *Eucalyptus* species in death of songbirds foraging in their leaves by means of gum and sap collection over the nares. This information should be considered in the choice of tree species for the campus.

p. 4.3-1: "Stone Canyon Creek, the only area on campus in which wetlands are considered possible, would not be characterized as a federally protected wetland due to the lack of plants characterized as hydrophytic according to the National List of Plant Species That Occur in Wetlands (U.S. Fish and Wildlife Service, 1988), which is one of three mandatory criteria to designate an area as a jurisdictional wetland (U.S. Fish and Wildlife Service, 1988; refer also to Appendix 5, Tables A5-1A and A5-1B)."

16-17

Hydrophytic plants are present in Stone Canyon Creek, as are hydric soils and streambed morphology. This area likely meets the criteria for a streambed under California Fish and Game Code Section 1600 *et seq.* The runoff from Bel Air provides surface flow to this stream nearly year round. We seriously question the determination that the creek is not a wetland, and ask that an official wetland delineation be conducted by a qualified individual under both Section 404 of the Clean Water Act and Section 1600 of the California Fish and Game Code.

p. 4.3- 3: "The Northwest zone contains the campus student residential facilities and features several areas of densely planted trees. In addition, this zone contains a four-acre hillside between Veteran Avenue and Parking Lot 11. Portions of this area, once used to graze livestock, remain undeveloped. While Longcore *et al.* (1997) previously reported coastal sage scrub in the Northwest zone, the vegetation observed in this zone during December 2001 and April 2002 surveys was interspersed with various exotic ornamental species and was determined to be of sufficiently low quality not to be considered a sensitive natural community."

There is no evidence supporting the determination that the coastal sage scrub is of "sufficiently low quality" not to be considered a sensitive natural community. This conclusion cannot be based on a detailed study of the site. We have studied the site in detail over the past six years and can vouch that it contains areas of coastal sage scrub that are 100% native cover and of a plant diversity that would be expected for the topographic situation. The history of disturbance at the site is not in question. It was probably grazed at some point, but it has also been used as a research site to investigate fuel accumulation of landscape plants (hence the large patch of rosemary still present). Many coastal sage scrub areas in southern California were once grazed, and now support healthy, high-quality scrub. The list of native species found on this site is impressive by any standard; it is simply not credible to deny the significant resource value of this site. To support this conclusion the EIR must contain specific evidence beyond the general statement that the scrub is low quality. In our professional experience reviewing over 30 major environmental impact analyses, we have never come across an assessment of a natural resource such as this that does not contain a vegetation map. To be credible, the EIR should include a map at a 1 m scale that describes the vegetation cover of this area.

16-18

p. 4.3-3: "Stone Canyon Creek is located east of the Corinne A. Seeds University Elementary School (UES) buildings and west of the Anderson Graduate School of Management (AGSM) and Charles E. Young Drive North. Despite its name, this feature is actually part of the University storm drain system and conveys flows through an underground box culvert both northeast of UES (at Royce Drive) and southeast of UES (at Collins Executive Education Center in the AGSM). The portion of Stone Canyon Creek adjacent to UES is subject to periods of very high discharge and is heavily vegetated with numerous exotic tree species, shrubs, and vines, as well as some native species."

16-19

This feature is *now* part of the stormwater conveyance system at UCLA. It is a "real" stream that has been encroached upon by successive waves of campus development.

16-19

p. 4.3-16: "Jepson. 1993. *The Jepson Manual — Higher Plants of California*."

The Jepson Manual in its current form was not written by "Jepson." The proper citation is:

16-20

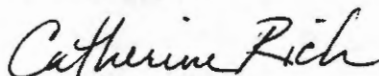
Hickman, James C., ed. 1993. *The Jepson manual: higher plants of California*. University of California Press, Berkeley, CA.

p. 4.8-10: "A Stipulated Agreement of Compromise (Agreement) was filed February 6, 1978, pursuant to the case of Westwood Hills Property Owners Association vs. The Regents of the University of California, et al. (Los Angeles Superior Court Case No. C180760). This Agreement defines a Benign Use Zone in the Northwest zone of campus that will be reserved for uses that include, but are not limited to, open green space, landscape buffer zones, existing ornamental horticultural buildings and parking facilities, and low-intensity, nonspectator, recreational and athletic space."

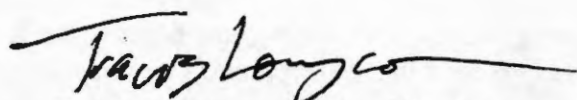
16-21

We request that the education program ongoing in the Stipulated Agreement area be described in the EIR and that the area be set aside as a permanent natural open space as mitigation for the continued urbanization and tree removal on the campus as a whole.

Yours sincerely,



Catherine Rich, Executive Officer
J.D. (UCLA), M.A. (UCLA)



Travis Longcore, Science Director
M.A. (UCLA), Ph.D. (UCLA)

THE URBAN WILDLANDS GROUP, INC.

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Comments on "Westwood Plaza to Sunset/Royce Drive Tree Planting Plan"

Introduction

Our collective reactions to the plan can be divided into two parts. First, we will give our impressions of what appears to be the landscape philosophy underlying this plan, and what it means for the character of the UCLA campus over the long term; second, we will offer specific ideas about the species chosen in each of the geographically distinct areas addressed in the plan. While there are components of the plan that we welcome appreciatively, such as the inclusion of native California sycamores along Sunset Boulevard, we also have some concerns about elements of the plan as presented.

Landscape philosophy

Most broadly, it is evident from the plan that the Campus Architect seeks to simplify and formalize the campus. This is consistent with changes to the campus that have occurred over the last ten years, therefore we believe it likely that this vision was articulated long before his arrival at UCLA. The Campus Architect in the text describing the replanting plan invokes the goals of strengthening, formalizing, and defining the landscape. Canary Island pines are chosen because of their "formal vertical structure"; new landscaping will "extend the formality" of the Men's Gym quad, and trees will be used to "strengthen the clarity" of a reconstructed intersection. While one purpose of landscaping can be to make an area "simple" for the pedestrian, as a dominating philosophy we believe that it robs people of the other compelling values of landscape — complexity, surprise, diversity, respite, animal life, and interest. Our overall impression is that this plan is too formal, and like much of the other landscaping of the past ten years, fails to incorporate the diversity, sophistication, and complexity of the Ralph Cornell era. In short, the plan is somewhat unimaginative, simplified to the extent that it will fail to command interest and quickly come to resemble any number of urban streets with limited character.

The formal and simple nature of the landscape as described in the plan will have effects on the human experience of the campus, and these have not been articulated. This experience depends partially on the diversity of landscape species; we consider this first.

Canary Island pines (*Pinus canariensis*) figure prominently in the species proposed for planting. These are fine trees, and they are especially nice when planted close together, and when allowed to grow fully and are not over-trimmed. We like them very much and are not on a campaign against them; indeed, we have repeatedly argued for their protection and will continue to do so in cases where their removal seems unnecessary. But this plan calls for the planting of Canary Island pines in areas once occupied by grand, spreading trees that provided shade and a great deal of visual interest. Arborist Alden Kelly, in his letter of July 25 regarding the proposed replanting

of Canary Island pines by the University Elementary School, expressed this concern about the difference between manna gums (*Eucalyptus viminalis*) and the pines. He stated that the pines "will seem a comparatively spindly subject after the large, spreading majestic manna gums." This is our primary concern with this choice of species for the areas once dominated by manna gums, and we will address this more fully in our comments on specific areas identified in the plan.

This choice also, however, reflects a broader philosophical position that deserves comment. One of the reasons given to justify the selection of this species is that it is already well represented on campus. We are not persuaded by this argument — the UCLA landscape was once prized for the diversity of species represented. UCLA in 1968 published a delightful booklet entitled *The University Garden*, which lists close to 200 landscape species, and which provides the visitor with four guided horticultural walking tours of the campus. There has been no update to this work. Many of the species identified are now lost, and the proposed plan does nothing to enhance diversity. The plan is also lacking in mid-sized shrubs and small trees. With the exception of what appears to be a formal rectangle of crape myrtles (*Lagerstroemia "Muskogee"*) there is no indication of a commitment to including plants that fill the space between trees and low ground cover. This removal of understory has been another trend evident in UCLA's landscaping in recent years, and one which is highly detrimental to bird life on campus.

We next consider the ways in which people experience a landscape. The experience of walking under a row of 70-year-old manna gums is vastly different from that of walking under a row of Canary Island pines. Manna gums are grand and shady, they grow and branch differently leading to visual interest, they have wonderfully interesting bark, their leaves move in the breeze, and they are fragrant. This is in contrast to Canary Island pines, which tend to be more uniform in appearance, do not provide much shade, and do not rustle in the breeze. This is a purely aesthetic statement, but we all perceive that this impending change in tree species will significantly alter, in a less than positive way, the human experience of walking in, or even driving through, areas once planted with manna gums.

Beyond the human experience, we would like to see bird life be given a degree consideration in landscape planting as well. Given that there will be change in tree species composition over time, as projects or built or trees become senescent, this could easily be accomplished by planing some native trees in areas that have traditionally supported "good" birds. (As past president and first vice president of the Los Angeles Audubon Society, we have a hard time not addressing this issue.) These areas tend to be on north campus. For example, it would have been just as easy to plant Engelmann oak (*Quercus engelmannii*) along Portola Drive, and would have been highly beneficial to our local birds. This is an area in which one can still on occasion find woodpeckers and migratory warblers, as well as an interested complement of resident native birds. The Engelmann oak itself is a tree that is becoming quite rare due to development pressures. Several of us were under the impression that our recent suggestion to plant Engelmann oak instead of Southern live oak in this location would be considered and discussed; we were therefore surprised to find the Southern live oaks being planted during the week of September 17. It is a pity that UCLA squandered the chance to help, in some small way, to support California's native oaks and wildlife, providing ancillary educational opportunities for students, faculty, and visitors in the process.

Possible obstacles and challenges

We acknowledge that the choice to simplify the landscape may at least partially result from perceived savings in management expenses. If there is a management principle operating, it should be expressed and shared with the campus community for comment. If it is perceived that species diversity for some reason costs more money than is currently budgeted, we believe that the problem of insufficient funds should be communicated to see if the campus desires to find a way to find additional funds to protect and enhance landscape diversity, before irrevocable decisions about tree plantings and landscaping are made. If money is an issue, a report should be commissioned that examines how UCLA could spend landscape care money more efficiently, for example, reevaluating watering regimes and resisting the peculiarly southern California compulsion to over-trim trees.

We also have a concern that the commitment to Canary Island pine even in the face of already expressed opposition might have something to do with having already commissioned them with a nursery. A decision that should last the campus at least fifty years should not be based on short-term monetary considerations. We should strive for the best trees, not those most readily available. With that in mind, we review the component areas of the tree replacement plan.

Area A

We would like to thank all those responsible for modifying the original replanting plan along Sunset Boulevard so that California sycamores (*Platanus racemosa*) will be planted along the outer portion of the roadway. This is a great improvement and we appreciate the inclusion of native trees. California sycamores in particular develop their own "personalities" as they form, thereby enhancing their visual appeal.

Regarding the internal roadway by the University Elementary School, we understand the rationale for planting a species of tree more suited to the areas once occupied by the manna gums. These were individuals of a species that grows particularly large, and while they would have thrived had the asphalt not encroached over the years, the growth of the university doomed them. The more restricted area available must of course be considered in choosing replacement trees. But as we have said above, we are concerned that the experience of being at the University Elementary School and along that roadway will be far more drastically changed by the absence of trees that provide shade than is being acknowledged. The manna gums provided almost total canopy cover for that area; this will not occur with Canary Island pines. The area will be brighter and hotter, and this has not been articulated in the plans.

Visually, we would prefer to see a tree that can provide shade over Charles E. Young Drive, as the manna gums have done for so many years. The truth is that there is nothing like eucalyptus and the "look and feel" will be impossible to replicate with any other genus of tree. After much consideration we would still like to engage in a discussion about the possibility of selecting one or more of the many other species of eucalyptus that are successfully planted in this region. We recognize that there are uncertainties regarding insect pests that currently affect a small number of species, specifically whether these pests will or will not infect additional species. Still, we are not persuaded that this is a reason not to consider them. We also realize that certain species are

prone to limb drop and that these obviously would not be acceptable. We are not in a position to recommend any one species at this time; we are interested in looking at specimens of many species with both aesthetics and suitability in mind. This would take a little time. We noticed two specimens of a particularly attractive species in Santa Monica quite recently, with blue-green foliage, furrowed bark, and small, pale flowers. There has not been time for either of our arborist colleagues to drive over and identify the species.

If, even after serious consideration, eucalyptus are to be ruled out altogether, we would suggest white alder (*Alnus rhombifolia*) to complement the California sycamore in this area in lieu of the Canary Island pines. This native species requires water, but the topography and former hydrology make it physiologically adapted to this area. It has been suggested that the oleanders that are currently found along this stretch of road should be removed due to their toxicity and proximity to the elementary school. If the oleanders are removed at some point, this would be an excellent area in which to incorporate additional native riparian species. Native willows (e.g., *Salix lasiolepis*), mule fat (*Baccharis salicifolia*), or blue elderberry (*Sambucus mexicana*) would all serve to shield UES from Sunset Boulevard. With shaping, these species would produce an effective screen, and all are vigorous enough to withstand the urban setting.

Area B

The intersection in Area B is proposed for reconstruction. We would urge that every effort be made to protect existing trees in this reconstruction, but it is not evident from the plan that this has been identified as a goal. It appears, rather, that more existing trees will be removed. If true, this would be nothing short of a terrible waste. If replacement trees are required, we see no reason not to continue the trees ultimately selected for Area A, with the possible addition of coast redwood (*Sequoia sempervirens*) and/or dawn redwood (*Metasequoia glyptostroboides*). The goal of having Canary Island pines "mark the northern and southern terminus of Westwood Plaza" seems a bit contrived; this connection has been long broken, and the connection between the pine trees here and at Le Conte Avenue makes sense only on a map.

Area C

Here the plan calls for the use of Southern live oak (*Quercus virginiana*). It is unclear why this oak, and not a native oak such as Engelmann oak (*Q. engelmannii*) or coast live oak (*Q. agrifolia*), is used. Both native species are also tolerant of poor soil conditions, and require only that they not be watered excessively. Concern about "sudden oak death" has been raised relative to the native species, but sudden oak death has only been found in black oak (*Q. kelloggii*), coast live oak (*Q. agrifolia*), and tanoak (*Lithocarpus densiflorus*). Engelmann oak has not been affected at all, and would therefore, we believe, be an excellent choice even given the concern about sudden oak death. (Research on biocontrol of sudden oak death is proceeding quickly, so we feel that even coast live oak should not be precluded from future landscaping plans.)

The spacing of Southern live oak along the western edge of the soccer field seems far too close for this species. Unless trimmed ruthlessly, these individuals will spread too much for the surrounding land use. A smaller tree that would perform well in this design is California laurel (*Umbellularia californica*).

More than one observer noted that the rectangular planting of crape myrtles at the Kaufman dance building seems overly rigid (assuming the map reflects the actual design). Rather than continuing to impose a harsh rectilinear homogeneity on the landscape, we would hope that this site be would be used to incorporate some informality and visual interest. We would also like to register again our unhappiness at the failure to protect the large deodar cedar at this building. Once again, our grand trees are being sacrificed for construction, even where there is latitude to design around them, and are being replaced with trees of less substance.

Area D

The use of Italian Stone pine (*Pinus pinea*) seems quite appropriate in Bruin Plaza, and we appreciate the inclusion of California sycamore as well. We suggest only that the sycamore trees not be used exclusively as walkway borders. While shade for walkways is important, having all the trees as walkway borders reinforces the feeling of linearity being developed on the campus. This is not a feeling that we, at least, enjoy. This is an area that would benefit from replacement eucalyptus as well, if they are allowed back into consideration.

Area E

While this area is slated for future planning efforts, the map implies that the eucalyptus recently planted between Ackerman Union and the West Center may be removed. The rationale for this is unclear. The new eucalyptus trees are growing quickly, and provide welcome shade in this heavily traveled area. We see no good reason to remove all eucalyptus from campus, which so clearly appears to be the trend. We would hope that any future plans for this area will not call for the exclusive planting of Canary Island pines.

Areas F, G, H

Although we concentrated on replacement trees for Sunset Boulevard in our meeting, the issue of the Westwood Boulevard trees is still extremely important to us, and to members of the community at large. We are concerned about the future look and feel of Westwood Boulevard based on the planting of Canary Island pine exclusively.

We appreciate the effort to save and replant Canary Island pines that would otherwise be destroyed in the dorm construction project, and support the idea of replanting these trees in the Le Conte gateway area. We do, however, still have a concern about the use of Canary Island pines exclusively along all of Westwood Boulevard, because of the great change in look and feel that will result.

The description of the desired visual outcome refers to providing "a strong columnar allee"¹, but we ask that this goal be reexamined. "Allee" can be translated to "alley," meaning, in a landscape sense, two straight lines of plantings. The DAR eucalyptus trees were planted to provide an allee from Le Conte all the way to Sunset. By invoking this description, it appears that there is an effort being made to retain something of the original look and feel of the campus. But the allee

¹ The word, of course, is "allee." Some spell-check programs should be quarantined in south campus.

formed by the new trees will create a very different experience for the visitor. Primary among these differences will be the notable lack of shade that will be provided by Canary Island pines. One Westwood community member said that these trees will "look like sticks." There may be some truth in this, given their spacing and what will most probably be regular pruning. There is less spread to them relative to the spread of the eucalyptus that formerly lined the boulevard, so they will provide less shade, and this will, quite simply, make arriving at this destination less pleasant.

Another related point is that eucalyptus trees by their nature become individualized. Their trunks split at unique points and they lean in seemingly random directions. In our opinion this adds to their charm. Although the eucalyptus were planted to form an allee, this uniqueness among trees softened what otherwise have been an overly structured, boring appearance. We are concerned that the "columnar" allee created by the Canary Island pines will look a lot like a row of telephone poles with needles, at least after the inevitable "bad haircut."

That is not to say that there is no use for Canary Island pines in this area. Our concern could be ameliorated by planting additional trees of a complementary species. We suggest interspersing the Canary Island pines with species that provide shade and added interest, including, of course, any eucalyptus that may be allowed back onto the acceptable landscape palette. Arborist Jan Scow recommends the following additional species as possibilities: bottle tree (*Brachychiton populneus*), pink cedar (*Acrocarpus fraxinifolius*), or valley oak (*Quercus lobata*).

Conclusion

We appreciate having been given the opportunity to comment meaningfully on a plan that by its nature affects a number of areas on the campus. Many people's day-to-day experiences will be affected by this replanting project. We of course hope that at least some of our suggestions can be incorporated into the plan as it is implemented. Beyond that, however, we hope that this can be the beginning of a dialogue on the ideas and philosophies underlying the continued development of the campus. We believe that the landscape should remain an integral part of the UCLA experience, and decisions should be made gathering the opinions of those who use and appreciate the campus.

We will close with a quote from Ralph Cornell, whose vision we can still find evident in patches of the campus, from his 1958 statement of landscape philosophy for UCLA: "With open spaces within which to work it then would be possible to replace some of the trees that have fallen before the inevitable physical expansion of the plant. It would be possible to provide tree masses, shade and broken sunlight, the color of flowering plants, the living things that contribute so realistically to the 'refreshment of the spirit of man'."

Catherine Rich
Travis Longcore
September 28, 2001



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Chancellor Albert Carnesale
Executive Vice-Chancellor Rory Hume
2147 Murphy Hall
Cc: Provost Brian Copenhaver
Vice Chancellor Roberto Peccei

May 15, 2001

RE: Creation of the Sage Hill Nature Reserve on the UCLA Campus

Dear Al and Rory:

On behalf of the Institute of the Environment, and a number of faculty and researchers representing a wide spectrum of disciplines, the Executive Committee of the IoE offers this proposal to establish a small "natural reserve" at the northwestern corner of the UCLA campus. The roughly four acres of land in question would be designated as the "Sage Hill Nature Reserve." The site, which is located adjacent to the Child Care Center, consists largely of undeveloped hillside, with a level area used by Facilities Management to store building materials. Under proper management, Sage Hill could provide a convenient teaching locale, a unique research field site, as well as an attraction for the local community. This patch of ground is a remnant of the coastal sage scrub that once covered the hills of Westwood and much of Southern California. However, with relentless development, this once abundant ecosystem is now considered an endangered habitat, with up to 90% already lost. The Executive committee of the IoE, along with many other UCLA faculty affiliated with the Institute, agree that we should act to preserve this last bit of relatively natural habitat on the campus. We would go further and point out that Sage Hill would offer a natural counterpoint to the Mathias Botanical Gardens - contrasting exotic species to endemic ones. The restoration of the site to a natural state would clearly sit well with the local residents, and would provide a naming opportunity as well.

The Sage Hill area has a long history of use for teaching and research. From the time the campus moved to Westwood in 1929, botanists, zoologists, and geographers have conducted field work and taught in that area of the campus. Many bird specimens in the Dickey collection bear labels designating "Faculty Ridge," which the area was called in those early years. This area had been used as a site for botanical research in the 1940s (that work being published, for example in the first volume of the journal, *Evolution*). Other studies in the 1960s addressed the emerging issue of urban ecology. In the 1970s, biology professor Nicholas Collias constructed aviaries in the area after his previous research site was displaced by dormitory construction. During the last

eight years, faculty in geography and biology have used the site for a variety of field classes in biogeography, bioresource management, and ecology. The plot has supported on-campus field trips and pilot research projects for many UCLA students over the years. Moreover, through a covenant with our surrounding Westwood and Bel Air neighbors, this area is to remain undeveloped into the foreseeable future. A nature reserve would be consistent with that covenant.

We are suggesting that the campus include the restoration and management of the Sage Hill reserve as an element of the current planning cycle. Although much of the shrub and oak-covered slope has been disturbed over the course of time, the natural values of this open space remain significant. Surveys have documented 46 species of native plants and 27 species of birds in residence. The site has been recently recolonized by California quail, deer are regularly seen there, and lizards and California slender salamander are common. A detailed dossier on the ecological content and values of Sage Hill has been assembled by Prof. Hartmut Walter (Geography), and that information is available for consideration. To get a better idea of the location and aspect of the site, a map and photo of the area is attached to this letter.

The specific work that will need to be carried out at Sage Hill, and the associated costs, should be rather modest. The following actions should be taken:

- Removal of invasive and exotic plants, which have encroached on the site over the years, from the entire area;

- Restoration/reintroduction of natural flora;

- Construction of trails and walking paths appropriate for the topography of the site;

- Establishment of a perimeter gate at the roadway level;

- Refurbishment of the existing aviary building as an outdoor exhibition;

- Opening of the site to the public at certain times using student docents as guides.

We have not estimated the costs associated with this project, but would expect it to be less than \$250,000, considering that much of the expertise and labor would be provided by faculty and students from the campus. The site itself, when restored, would more than pay for itself as a teaching and research facility for the campus. If a donor were found to support the reserve, further development could be contemplated. The goodwill gained with our neighbors is invaluable.

We point out that other UC campuses have taken bold actions to protect natural areas on, or adjacent to, their property. Most of these campuses also manage substantial facilities associated with the UC Natural Reserve System, whereas UCLA has to date inaugurated only one reserve, Stunt Ranch, and that only recently. As an example of other UC commitments, Irvine established the 202-acre San Joaquin Freshwater Marsh Reserve adjacent to its campus, as well as a 60-acre ecological reserve on the campus, which together constitute more than 15% of UCI's total land area (not including their 14-acre arboretum). The 157-acre Coal Oil Point Reserve located on the west end of the UC Santa Barbara campus alone occupies about 16% of the total university acreage. UCSB also has seven or eight other areas administered as natural open spaces. Beyond UC, among distinguished universities across the U.S. and abroad, there has been a trend to

maintain natural habitat near the central campus for the benefit and pleasure of the university community.

At UCLA, the Sage Hill Reserve could be managed (academically) by one of several units, including the Stunt Ranch Reserve, the Mathias Botanical Gardens, or the Institute of the Environment. Stunt Ranch personnel, for example, are already experienced in the training of docents, construction of exhibits, and organization of K-12 class visits. Stunt Ranch also represents a natural extension of Sage Hill into the Santa Monica Mountains.

We hope that you will convene a meeting to commence planning for the preservation, and restoration, of this truly unique locale on the UCLA campus. Please call on us for any guidance or advice you feel we may be able to offer.

Sincerely,

The Executive Committee (undersigned)





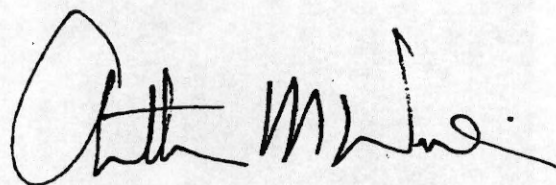




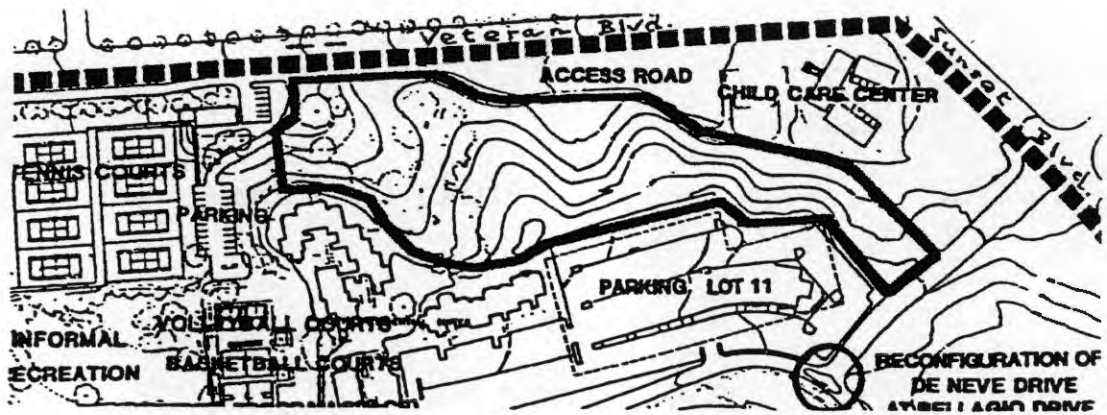


Arthur M. Winer

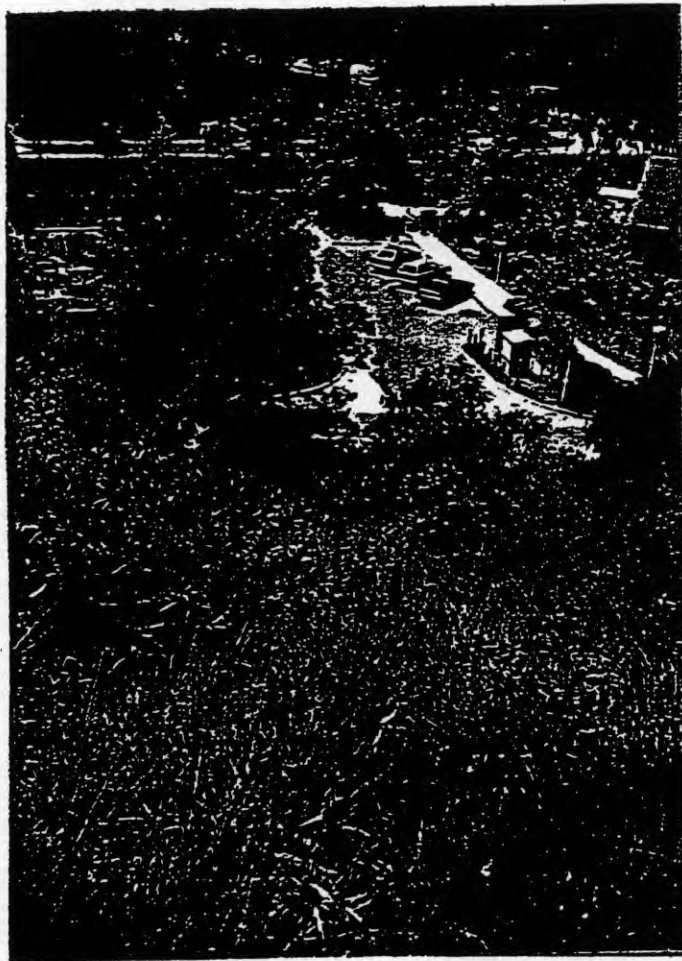
I am pleased to sign the letter
advocating creation of the Sage Hill
Nature Reserve at UCLA.

A handwritten signature in cursive script, reading "Arthur M. Winer". The signature is fluid and stylized, with a large initial "A" and a long, sweeping underline.

ES&E Program, UCLA School of Public Health



Location of the proposed 'Sage Hill' Nature Reserve



View of parking lot at the Child Care Center from the top of 'Sage Hill'; notice native plants such as toyon, elderberry, and coastal live oak

February 2001

RE: Nature Reserve on the UCLA Campus

Dear Chancellor Carnesale:

We, the undersigned, are students enrolled in the course "Global Environment 2" (M1B), Winter Quarter 2001. During two recent 'Nature on Campus' field trips we were surprised and delighted by the fact that a four acre fragment of the historic natural environment of Westwood still exists on our campus. We urge you protect this important remnant of *coastal sage scrub* located next to the UCLA Child Care Center at the corner of Veteran Blvd. and Sunset Blvd.

This small piece of nature is a reminder of the early history of the campus and adds diversity to the campus landscape with its gardens, parks, and places. It represents an important indigenous and spontaneous counterpoint to the beautiful plantings of trees and shrubs from all over the world for which our campus is famous.

We strongly endorse a proposal supported by the Institute of the Environment, various faculty, staff, and alumni to establish the 'sage hill' area as an official *nature reserve* on our campus for the benefit of environmental instruction and for student and faculty research projects in the life and earth sciences.

Signature

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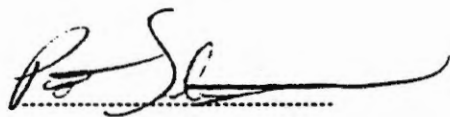
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Romero, Michael

Regina Hanorio

Walt Schuler - Broom

Melissa Merias

Maribel Crampo

Erica Martinez

Sarah Brett

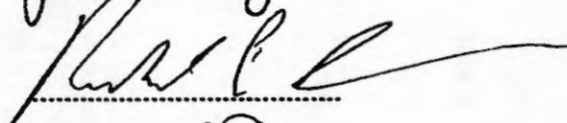
Amelia

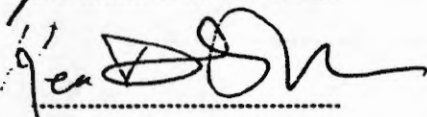
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Photo by Gary

UCLA student Josh Burnam studies birds as part of an environmental study being conducted by a group of UCLA students on a wild piece of university land.

The last wild space in Westwood

By Katherine Gould

On a sunny afternoon, a group of students walks on a path through heavy undergrowth, under oak trees, past wild sage and mustard. A mockingbird sits on a tree branch. Overhead a hawk is being pestered by three crows intent on scaring the predator away from their nests. It could be high in the foothills, but actually the group is at the northwest corner of the UCLA campus on the last wild piece of land in Westwood.

The students, most of them seniors majoring in environmental studies or geography, are using the

four-acre site as a classroom and a spot to study the native plants, birds, insects and animals of the California coastal area. As a part of their biore-source management course, they are preparing a habitat conservation plan for the site, under the direction of UCLA Geography Instructor Dr. Rudi Mattoni.

The idea is to study the plants and animals in the region and determine what measures could be taken to restore the site to its native diversity. The students also hope to show that vacant space can be a very valuable teaching tool.

"We feel there are areas on this campus that can serve that [educa-

tion] function even though they're small," says graduate student Catherine Rich.

Student Karl Hillway is studying the historical background of the site, researching what it used to look like and how it has changed. He unearthed a large collection of aerial photos of the UCLA campus taken over the university's 75-year history that show the campus surrounded by brush and chaparral, and even an arroyo running along the east end of campus. That arroyo was filled in during the 1940s and several buildings, including Bunche Hall, were built on top of it.

See "Wild Space" on page 3

Wild Space

continued from page 1

Erik Dubernay is studying butterflies. He became interested in the study simply because he noticed that there weren't as many butterflies in his neighborhood as there were when he was young. Even the dusty winged moths that torment porch lights had dropped in number. He became interested in the study because he was interested in how a loss of habitat could affect the butterfly population. He found that many butterflies simply prefer undisturbed habitat, something that is very hard to come by in West Los Angeles.

Other students are organized into groups to study plants, insects, birds and animals. The plant people take samples of plants and try to identify how much of each species is in the area. They identify the plants, and identify whether or not they are native. Though it is plentiful, wild mustard is not native, Mattoni says. Nor is the bountiful rosemary that has taken over an entire portion of the hillside. Of the 10 or so species of grasses on the site, only one or two are native.

The students studying animals set traps (the non-injuring sort) to aid them in their study of animal populations and habits.

Insects unfortunately cannot be trapped without being injured, so they are collected in environmentally friendly antifreeze to be counted.

The students compare the UCLA site to undisturbed areas in Will Rogers State Park, Mattoni says, in order to understand what plants should be in the area and what should not. As part of their habitat conservation study, they will try to determine how the area could be restored to a native habitat.

One potential problem with restoring the native habitat is that by definition not all the animals and birds can be returned to the area.

The four-acre site is simply too small to support mountain lions, coyotes, and bobcats. And while deer occasionally wander out of the mountains into the manicured gardens of Bel-Air, the UCLA campus is not a great habitat for them.

"How do you manage a habitat that had these larger animals but they won't be here?" asks Mattoni. That is something the students are studying.

Mattoni was a specialist in population genetics before he joined the UCLA geography department three years ago, specializing in biogeography. In addition to his work at UCLA he is helping to restore the sand dunes near LAX in El Segundo, and he is doing research on a 300-acre area near San Pedro that is home to a butterfly once thought to be extinct. He is also researching the dekhli sands fly, a hummingbird-sized insect native to Riverside County that is near extinction.

He was not even aware that the wild area existed on the campus until his teaching assistant Travis Longcore mentioned it.

"I figured, we've got the class. Rather than having them do a term paper, let's have them do a habitat conservation plan," he says. He offered the project to his 65 students, and 18 took him up on the opportunity for field research.

Mattoni says he has been very impressed with the excitement with which the students have taken up their assignment. They in turn are thrilled with the opportunity to do more than learn out of a book and research in a library. Josh Burnam, a 21-year-old senior who hopes to enter graduate school next year, says the project has provided him with field experience he could get nowhere else. And it is just nice to get out of the classroom every once in a



UCLA graduate student Travis Longcore (left) leads a group of students who are studying the local environment on a wild area at the northeast corner of the UCLA campus.

while.

For Erik Dubernay, the study has given him a wider understanding of the local environment. "I knew nothing about plants, nothing about butterflies," he says. "I've gained an enormous understanding."

Now he travels with a giant chart of butterflies and can name many of the plants on the site. The 35-year-old former construction worker is passing his knowledge along to his 4-year-old daughter Alana, who joins the group in their study sessions, asking to learn more.

That the site is not covered by native plants is related to its history. About 30 years ago, university officials cleared the hillside. Researchers used the site to study

plants. One researcher, William Miller, used the area so often that part of it is known as Miller's Gulch.

Now that the plants are grown, and native plants have grown back, students have the opportunity to study the regeneration of native coastal sage scrub.

The students are hoping to show not only what they have learned from their study, but to prove that wild land is not wasted land on the campus. To university officials trying to provide for a continually growing population, the vacant land is an attractive space. The students hope they will consider otherwise, and will see the last wild piece of Westwood as an irreplaceable classroom.

Photo by Gary McCarthy

CATHERINE RICH
P.O. Box 24020
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Education

UCLA Department of Geography, M.A. June 1997. Emphasis in biogeography, urban wildlife, environmental philosophy. Thesis: *Poliophilophilia? Toward an Understanding of the Role of Human Emotion in Nature Preservation*. Teaching Assistant: Biogeography, Physical Geography, People and the Earth's Ecosystems.

UCLA School of Law, J.D. June 1981. Member, State Bar of California. Co-founder and Associate Editor, *UCLA Journal of Environmental Law and Policy*. Co-founder and officer (faculty liaison), UCLA Environmental Law Society.

University of California, Berkeley, A.B. March 1978 (with Distinction). Pre-medical course, psychology major. Member, Board of Directors, U.C. Berkeley CalPIRG (1976-1977). Co-founder, U.C. Berkeley CalPIRG (1976).

Professional Experience

Co-founder and Executive Officer, The Urban Wildlands Group (1996-present). Organization studies and works to protect species, habitats, and ecological processes within urban and urbanizing areas. Projects include restoration and management of habitat supporting endangered butterfly species, public education about effects of noise and artificial night lighting on wildlife, promotion of humane approaches to wildlife management, research on minimizing ecological effects of fuel modification.

Principal, Land Protection Partners (1998-present). Consultant to attorneys in land protection actions (primarily California Environmental Quality Act, California Coastal Act, federal Endangered Species Act). Services include issue identification, preparation of biological analysis with supporting scientific literature review, communication with resource agency personnel.

Contract Attorney, Law Offices of Jonathan Kirsch (1999-present). Trademark and publishing law.

Copy Editor, *Journal of Research on the Lepidoptera* (1997-1999).

Legal/Policy Consultant (1989-1992). Projects included assisting in the preparation of lawsuit (*Nordlinger v. Lynch*) challenging property tax assessment scheme mandated by Proposition 13 (for Center for Law in the Public Interest).

Deputy, Los Angeles City Councilman Marvin Braude (1987-1988). Formulated and developed environmental policies and programs. Represented councilman before city boards,

commissions, and committees, and at community meetings. Coordinated councilman's reelection campaign for seat on AQMD Board.

Community Representative (1985-1986). Directed successful effort to prevent developer from demolishing five contiguous apartment buildings in an unredeveloped Westwood neighborhood. Persuaded Los Angeles City Council to enact a local building moratorium, then successfully represented local community before Planning and Environment Committee of the City Council in a hardship exemption hearing requested by developer. Prepared architectural and historical documentation for Historic Preservation Overlay Zone application.

Staff Attorney, California Commission on Campaign Financing (1984-1985). Contributed to two-volume report on legislative campaign financing (*The New Gold Rush: Financing California's Legislative Campaigns*).

Full-time staff member, Gary Hart presidential campaign (1984). Field desk contact for Northern California; Los Angeles regional co-coordinator. Appointed to Credentials Committee of the 1984 Democratic National Convention.

Attorney, Paul, Hastings, Janofsky & Walker (1983). General civil litigation.

Editor/Assistant, Professor Charles M. Firestone (1982-1983). Edited Firestone and Johnson's *Cases and materials on communications law and policy*; assisted in preparations for conference, UCLA Communications Law Program/International Bar Association Symposium on International Satellite Television.

Research Assistant, Professor Richard Abel (Summer 1980). Compiled information on workplace exposure to toxic substances.

Intern, Hollywood Revitalization Committee (funded by National Trust for Historic Preservation) (Summer 1979). Evaluated feasibility of establishing a façade easement program for Hollywood's historic buildings.

Research Assistant, Professor Laura Nader (funded by National Highway Traffic Safety Administration) (Spring 1978). Research on social costs of automobile accidents.

Research Assistant, Professor Laura Nader (Summer 1977). Participated in study funded by Energy Research & Development Administration evaluating feasibility of alternative energy systems in California. Interviewed officials involved with the implementation of Energy Conservation Standards for New Residential Buildings.

Publications and Reports

Rich, Catherine, and Travis Longcore (eds.). *Ecological consequences of artificial night lighting*. Island Press (in preparation for 2004 publication).

- Longcore, Travis, and Catherine Rich. Adequacy of biological resources analysis in Heschel West School Draft Environmental Impact Report. Los Angeles, Land Protection Partners, 23 pp. (December 11, 2002).
- Longcore, Travis, and Catherine Rich. Review of biological resources analysis in Malibu Bay Company Development Agreement Draft Environmental Impact Report. Los Angeles, Land Protection Partners, 28 pp. (November 11, 2002).
- Longcore, Travis, and Catherine Rich. Action plan for Kern primrose sphinx moth (*Euproserpinus euterpe*) at Carrizo Plain National Monument. Los Angeles, The Urban Wildlands Group, 15 pp. (report to U.S. Fish and Wildlife Service, November 1, 2002).
- Longcore, Travis, Rudi Mattoni, Alison Lipman, Zdenka Krenova, and Catherine Rich. Final report for Palos Verdes blue butterfly year 2002 captive rearing on Defense Fuel Support Point, San Pedro, California. Los Angeles, The Urban Wildlands Group (Defense Logistics Agency Agreement # N68711-02-LT-00010), 18 pp. (October 1, 2002).
- Longcore, Travis, and Catherine Rich. Effects of light and noise from a proposed Wal-Mart "Supercenter" on the wildlife of Penjajawoc Marsh (Bangor, Maine). Los Angeles, Land Protection Partners, 18 pp. (June 7, 2002).
- Longcore, Travis, and Catherine Rich. Protection of environmentally sensitive habitat areas in proposed Local Coastal Plan for City of Malibu. Los Angeles, The Urban Wildlands Group, 19 pp. (May 30, 2002).
- Longcore, Travis, and Catherine Rich. A review of the ecological effects of road reconfiguration and expansion on coastal wetland ecosystems. Los Angeles, The Urban Wildlands Group, 12 pp. (November 14, 2001).
- Longcore, Travis, and Catherine Rich. Review of biological resources analysis in draft Scully-Miller/Fieldstone Communities Environmental Impact Report (SCH #99101125). Los Angeles, Land Protection Partners, 15 pp. (October 19, 2001).
- Longcore, Travis, and Catherine Rich. Review of biological resources analysis in LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report. Los Angeles, Land Protection Partners, 27 pp. (August 8, 2001).
- Longcore, Travis, and Catherine Rich. Review of biological resources analysis in City of Malibu Negative Declaration No. 00-010 (Kempin Single Family Residence). Los Angeles, Land Protection Partners, 5 pp. (July 23, 2001).
- Longcore, Travis, Rudi Mattoni, Gordon Pratt, and Catherine Rich. On the perils of ecological restoration: lessons from the El Segundo blue butterfly. Pp. 281-286 in Keeley, Jon, Melanie Baer-Keeley, and C.J. Fotheringham, eds. *2nd Interface Between Ecology and Land Development in California*, U.S. Geological Survey Open-File Report 00-62, Sacramento, CA (2000). (Abstracted in *Ecological Restoration* 19(2):125 (2001).)

Mattoni, Rudi, Arthur Bonner, Jeremiah George, Travis Longcore, Catherine Rich, and Rick Rogers. 1997 Palos Verdes blue butterfly (*Glaucopsyche lygdamus palosverdesensis*) adult population survey (report to U.S. Fish and Wildlife Service, June 30, 1997).

Rich, Catherine, and Travis Longcore. Consultation issues at UCLA: landscape and construction (unpublished report, February 1996).

Nader, Laura, Norman Milleron, Joseph Palacios, and Catherine Rich. Belief, behavior, and technologies as driving forces in transitional stages — the people problem in dispersed energy futures. Pp. 177–238 in *Distributed energy systems in California's future: a preliminary report, Volume 2*. Washington, D.C.: Energy Research & Development Administration (September 1977).

Conference Presentations

Longcore, Travis, and Catherine Rich. *419 acres: UCLA's natural history. 1. Land use, 2. Biological homogenization, 3. Island biogeography*. Poster series and display presented at California's Biodiversity Crisis: The Loss of Nature in an Urbanizing World (UCLA, October 24–25, 1998).

Longcore, Travis, Rudi Mattoni, Gordon Pratt, and Catherine Rich. *On the perils of ecological restoration: lessons from the El Segundo blue butterfly*. Paper presented at 2nd Interface Between Ecology and Land Development in California (Occidental College, Los Angeles, California, April 18–19, 1997).

Mattoni, Rudi, Travis Longcore, Jeremiah George, and Catherine Rich. *Down memory lane: the Los Angeles coastal prairie and its vernal pools*. Poster presented at 2nd Interface Between Ecology and Land Development in California (Occidental College, Los Angeles, California, April 18–19, 1997).

Grants and Awards

U.S. Fish and Wildlife Service. Grant of \$24,000 to The Urban Wildlands Group to develop Recovery Plan for endangered Callippe silverspot butterfly in San Francisco area, California (2002).

U.S. Fish and Wildlife Service. Grant of \$10,000 to The Urban Wildlands Group to develop Action Plan for endangered Kern primrose sphinx moth on BLM land in the Carrizo Plain National Monument, California (2002).

National Fish and Wildlife Foundation. Grant of \$5,000 to The Urban Wildlands Group to support conference, *Ecological Consequences of Artificial Night Lighting* (2002).

Electric Power Research Institute. Grant of \$2,000 to The Urban Wildlands Group to support conference, *Ecological Consequences of Artificial Night Lighting* (2002).

Defense Logistics Agency. Grant of \$42,665 to The Urban Wildlands Group to conduct experimental captive propagation of endangered Palos Verdes blue butterfly (2002).

U.S. Fish and Wildlife Service Landowner Incentive Program. Grant of \$37,300 to The Urban Wildlands Group to restore habitat for endangered El Segundo blue butterfly on private property in Torrance, California (2001).

International Dark-Sky Association Executive Director's Award, "In recognition of her enthusiastic efforts in the pursuit of the promotion of Dark Skies" (2002).

International Dark-Sky Association Executive Director's Award, "For outstanding service in protecting our nighttime environment" (2001).

Selected Activities and Memberships

Conference Co-Chair, The Urban Wildlands Group/UCLA Institute of the Environment, *Ecological Consequences of Artificial Night Lighting* (2002)

Advisor, California Wildlife Foundation (2002–present)

Member, Advisory Council, California Oak Foundation (1999–present)

Member, Conference Steering Committee, UCLA Institute of the Environment, *California's Biodiversity Crisis: The Loss of Nature in an Urbanizing World* (1998)

President, Los Angeles Audubon Society (1996–1997)

Conservation Co-Chair, Los Angeles Audubon Society (1995–1996)

Second Vice President, Los Angeles Audubon Society (1994–1995)

Member, Advisory Committee, Los Angeles County 1996 Proposition A. Successfully lobbied for inclusion of, and wrote, statement in Proposition A's preamble pertaining to the importance of maintaining biological diversity within the County, and successfully lobbied for creation of a competitive grant category for habitat acquisition and/or restoration.

Member, Society for Conservation Biology

Member, Cooper Ornithological Society

TRAVIS LONGCORE

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EDUCATION

- Ph.D., Geography, University of California, Los Angeles 1995-1999
Dissertation Title: *Terrestrial Arthropods as Indicators of Restoration Success in Coastal Sage Scrub*
- M. A., Geography, University of California, Los Angeles 1993-1995
Thesis Title: *Risk, Technology, and Place: Siting a Radioactive Waste Dump in California's Ward Valley*
- Honors B. A., Geography *summa cum laude*, University of Delaware 1989-1993
Thesis Title: *Information Technology and World City Restructuring: The Case of New York City's Financial District*

PROFESSIONAL EXPERIENCE

- Research Assistant Professor, Sustainable Cities Program, University of Southern California 2001-present
- Lecturer, UCLA Department of Geography, UCLA Department of Organismic Biology, Ecology and Evolution 2000-present
Lower division: Biogeography, People and the Earth's Ecosystems. Upper division: World Vegetation, Forest Ecosystems, Ecology, Environmental Impact Analysis.
- Co-founder and Science Director, The Urban Wildlands Group 1996-present
Organization studies and works to protect species, habitats, and ecological processes within urban and urbanizing areas. Projects include restoration and management of habitat supporting endangered butterfly species, education of policymakers on impacts of artificial light and noise on wildlife, research on minimizing ecological effects of fuel modification.
- Principal, Land Protection Partners 1998-present
Consultant to attorneys in land protection actions (primarily California Environmental Quality Act, California Coastal Act, and federal Endangered Species Act). Services include issue identification, preparation of biological analysis with supporting scientific literature review, and communication with resource agency personnel.
- Research Associate, Sustainable Cities Program, University of Southern California 1999-2001
- Summer Instructor, UCLA Graduate School of Education and Information Studies 1997-1999
- Staff Researcher, UCLA Department of Geography 1996-1999
- Teaching Assistant, UCLA Department of Geography 1995-1996
- Geographic Information System Technician, Water Resources Agency, New Castle County, Delaware 1992-1993

GRANTS, HONORS, AND AWARDS

Professional

- | | |
|---|------|
| U.S. Fish and Wildlife Service | 2002 |
| Contract for \$10,000 to The Urban Wildlands Group to draft management plan for endangered Kern primrose sphinx moth. | |
| U.S. Fish and Wildlife Service | 2002 |
| Contract for \$24,000 to The Urban Wildlands Group to draft species recovery plan for endangered Calippe silverspot butterfly. | |
| International Dark-Sky Association Executive Director's Award | 2002 |
| National Fish and Wildlife Foundation | 2002 |
| Grant of \$5,000 to The Urban Wildlands Group to support conference <i>Ecological Consequences of Artificial Night Lighting</i> . | |
| Electric Power Research Institute | 2002 |
| Grant of \$2,000 to The Urban Wildlands Group to support conference <i>Ecological Consequences of Artificial Night Lighting</i> . | |
| Defense Logistics Agency | 2002 |
| Contract for \$42,665 to The Urban Wildlands Group to conduct experimental captive propagation of endangered Palos Verdes blue butterfly. | |
| U.S. Fish and Wildlife Service Landowner Incentive Program | 2001 |
| Grant of \$37,300 to The Urban Wildlands Group to restore habitat for endangered El Segundo blue butterfly on private property in Torrance, California. | |
| John Randolph Haynes and Dora Haynes Foundation | 2000 |
| Co-author of \$398,000 grant to USC Sustainable Cities Program to assess benefits of urban greening in a dense inner-city neighborhood. | |
| Los Angeles Department of Water and Power | 2000 |
| USC Sustainable Cities Program awarded \$9,000 contract to assess "Cool Schools" tree planting program. | |
| New Research Design Award for a More Sustainable Los Angeles Region, John Randolph Haynes and Dora Haynes Foundation | 2000 |
| Awarded \$5,000 to develop a research design for the use of native plants in phytoremediation. | |

Graduate

- | | |
|---|------|
| Conference Travel Grant, UCLA Department of Geography | 1999 |
| Dissertation Improvement Grant, National Science Foundation (\$8,000) | 1998 |
| Distinguished Doctoral Scholar Fellowship, UCLA Alumni Association (\$17,500) | 1998 |
| Portable Fellowship, UCLA Graduate Division (\$18,500) | 1997 |
| Graduate Research Fellowship, National Science Foundation (\$64,400) | 1993 |

Chancellor's Fellowship, UCLA Graduate Division (declined) 1993

Undergraduate

Alexander J. Taylor Award ("Outstanding Senior Man"), University of Delaware 1993

Geography Faculty Award, University of Delaware 1993

Mid-Atlantic Region Finalist, Rhodes Scholarship 1992

Fellow, Arizona Honors Academy, Northern Arizona University 1992

Marie Donaghay Award for Excellence in Geography, University of Delaware 1992

Phi Beta Kappa 1992

Phi Beta Kappa Clift and DeArmond Award, University of Delaware 1991

George and Margaret Collins Seitz Award, University of Delaware 1991

Eugene duPont Memorial Distinguished Scholar Award, University of Delaware (\$44,500) 1989

PUBLICATIONS AND PRESENTATIONS

In Preparation

1. Rich, Catherine, and Travis Longcore (eds.). *Ecological consequences of artificial night lighting*. Island Press (scheduled 2004).
2. Longcore, Travis, Christina Li, and John P. Wilson. Nature's services in a dense urban neighborhood. *Environmental Management*.

In Review

2. Longcore, Travis, Christina Li, and John P. Wilson. Applicability of CITYgreen urban ecosystem analysis software to a dense urban neighborhood. *Urban Geography*.
1. Longcore, Travis. Ecological effects of fuel management practices around residential development. Sidebar for chapter by Kevin Shafer in text on California fire ecology.

Peer Reviewed Publications

10. Longcore, Travis. Arthropods as indicators of restoration success in coastal sage scrub. *Restoration Ecology* (accepted pending revisions).
9. Longcore, Travis, Rudi Mattoni, Cor Zonneveld, and Jorn Bruggeman. INsect Count Analyzer: a tool to assess responses of butterflies to habitat restoration. *Ecological Restoration* (forthcoming, March 2003).
8. Zonneveld, Cor, Travis Longcore, and Claudia Mulder. Optimal schemes to detect presence of insect species. *Conservation Biology* (forthcoming, April 2003).
7. Longcore, Travis. Ecological effects of fuel modification on arthropods and other wildlife in an urbanizing wildland. Pp. 000-000 in L.A. Brennan et al. (eds.) *National Congress on Fire Ecology, Prevention, and Management Proceedings*, No. 1, Tall Timbers Research Station, Tallahassee, FL (in press).

6. Mattoni, Rudi, Travis Longcore, Cor Zonneveld, and Vojtech Novotny. Analysis of transect counts to monitor population size in endangered insects: the case of the El Segundo blue butterfly, *Euphilotes bernardino allyni*. *Journal of Insect Conservation* 5(3):197-206 (2001).
5. Longcore, Travis, Rudi Mattoni, Gordon Pratt, and Catherine Rich. On the perils of ecological restoration: lessons from the El Segundo blue butterfly. Pp. 281-286 in Keeley, Jon, Melanie Baer-Keeley, and C. J. Fotheringham, eds. *2nd Interface Between Ecology and Land Development in California*, U.S. Geological Survey Open-File Report 00-62, Sacramento, CA (2000). (Abstracted in *Ecological Restoration* 19(2):125 (2001).)
4. Mattoni, Rudi, Vojtech Novotny, and Travis Longcore. Arthropod monitoring for fine scale habitat analysis: A case study of the El Segundo sand dunes. *Environmental Management* 25(4):445-452 (2000).
3. Mattoni, Rudi and Travis R. Longcore. The Los Angeles coastal prairie, a vanished community. *Crossosoma* 23(2):71-102 (1997).
2. Mattoni, Rudi, Gordon F. Pratt, Travis R. Longcore, John F. Emmel and Jeremiah N. George. The endangered Quino checkerspot butterfly, *Euphydryas editha quino* (Lepidoptera: Nymphalidae). *Journal of Research on the Lepidoptera* 34:99-118 (1997).
1. Longcore, Travis R. and Peter W. Rees. Information technology and downtown restructuring: the case of New York City's financial district. *Urban Geography* 17(4):354-372 (1996).

Book Reviews

2. Longcore, Travis. Review of *From Coastal Wilderness to Fruited Plain: A History of Environmental Change in Temperate North America from 1500 to Present*, by Gordon G. Whitney. *Ethics, Place and Environment* 4(3):278-279 (2001).
1. Longcore, Travis. Review of *Butterflies on British and Irish Offshore Islands: Ecology and Biogeography*, by Roger Dennis and Tim Shreeve. *Journal of Research on the Lepidoptera* 35:139-140 (2000).

Scientific Reports and Publications

26. Longcore, Travis, and Catherine Rich. Review of biological resources analysis in Malibu Bay Company Development Agreement Draft Environmental Impact Report. Los Angeles, Land Protection Partners, 28 pp. (November 11, 2002).
25. Longcore, Travis, and Catherine Rich. Action plan for Kern primrose sphinx moth (*Euproserpinus euterpe*) at Carrizo Plain National Monument. Los Angeles, The Urban Wildlands Group. 15 pp. (report to U.S. Fish and Wildlife Service, November 1, 2002).
24. Longcore, Travis, Rudi Mattoni, Alison Lipman, Zdenka Krenova, and Catherine Rich. Final report for Palos Verdes blue butterfly year 2002 captive rearing on Defense Fuel Support Point, San Pedro, California. Los Angeles, The Urban Wildlands Group (Defense Logistics Agency Agreement # N68711-02-LT-00010). 18 pp. (October 1, 2002).
23. Longcore, Travis, and Catherine Rich. Effects of light and noise from a proposed Wal-Mart "Supercenter" on the wildlife of Penjajawoc Marsh (Bangor, Maine). Los Angeles, Land Protection Partners. 18 pp. (June 7, 2002).
22. Longcore, Travis and Catherine Rich. Protection of environmentally sensitive habitat areas in proposed Local Coastal Plan for City of Malibu. Los Angeles, The Urban Wildlands Group. 19 pp. (May 2002).

21. Mattoni, Rudi and Travis Longcore. Census results for Palos Verdes blue butterfly and associated species, 1994–2001. Pp. 2–10 in Mattoni, Rudi (ed.) *Status and trends: habitat restoration and the endangered Palos Verdes blue butterfly at the Defense Fuel Support Point, San Pedro, California, 1994–2001*. Los Angeles, The Urban Wildlands Group (April 2002).
20. Mattoni, Rudi, Travis Longcore, and Alison Lipman. Description of habitat characteristics of the Palos Verdes blue butterfly. Pp. 11–15 in Mattoni, Rudi (ed.) *Status and trends: habitat restoration and the endangered Palos Verdes blue butterfly at the Defense Fuel Support Point, San Pedro, California, 1994–2001*. Los Angeles, The Urban Wildlands Group (April 2002).
19. Longcore, Travis. Invertebrate community composition as an indicator of restoration success. Pp. 52–68 in Mattoni, Rudi (ed.) *Status and trends: habitat restoration and the endangered Palos Verdes blue butterfly at the Defense Fuel Support Point, San Pedro, California, 1994–2001*. Los Angeles, The Urban Wildlands Group (April 2002).
18. Longcore, Travis and Jeremiah George. Habitat Evaluation for El Segundo Blue Butterfly (*Euphilotes bernardino allyni*) at Malaga Bluffs. Los Angeles, The Urban Wildlands Group (report to U.S. Fish and Wildlife Service Cooperative Agreement #1448-11430-1-J041, December 30, 2001).
17. Longcore, Travis and Catherine Rich. A review of the ecological effects of road reconfiguration and expansion on coastal wetland ecosystems. Los Angeles, The Urban Wildlands Group. 12 pp. (November 14, 2001).
16. Longcore, Travis and Catherine Rich. Review of biological resources analysis in draft Scully-Miller/Fieldstone Communities Environmental Impact Report (SCH#99101125). Los Angeles, Land Protection Partners. 15 pp. (October 19, 2001).
15. Longcore, Travis and Catherine Rich. Review of biological resources analysis in LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report. Los Angeles, Land Protection Partners. 27 pp. (August 8, 2001).
14. Longcore, Travis and Catherine Rich. Review of biological resources analysis in City of Malibu Negative Declaration No. 00-010 (Kempin Single Family Residence). Los Angeles, Land Protection Partners. 5 pp. (July 23, 2001).
13. Young, Terrence, with Travis Longcore. *Creating Community Greenspace: A Handbook for Developing Sustainable Open Spaces in Central Cities*. Los Angeles, California League of Conservation Voters Education Fund. 64 pp. (2000).
12. United States Fish and Wildlife Service (Alison Anderson, Edith Allen, Mark Dodero, Camille Parmesan, Travis Longcore, Gordon Pratt, Dennis Murphy, and Michael Singer). Draft Recovery Plan for the Quino Checkerspot butterfly (*Euphydryas editha quino*). Portland, Oregon (2000).
11. Longcore, Travis, Kyle Fitzpatrick, and Maureen Phelan. Assessment of Los Angeles Department of Water and Power Cool Schools Program, University of Southern California Sustainable Cities Program (report to Los Angeles Department of Water and Power, December 2000).
10. Mattoni, Rudi and Travis Longcore. 2000 Palos Verdes Blue Butterfly (*Glaucopsyche lygdamus palosverdesensis*) Adult Population Survey (report to U.S. Fish and Wildlife Service, August 28, 2000).
9. Lassiter, Unna, Travis Longcore, and Stephanie Pincetl. 53rd and Latham: Residents' Preferences for Amenities for an Urban Park, University of Southern California Sustainable Cities Program

(report to City of Los Angeles, Department of Recreation and Parks, January 2000).

8. Mattoni, Rudi, Travis Longcore, and Rick Rogers. 1999 Palos Verdes Blue Butterfly (*Glaucopsyche lygdamus palosverdesensis*) Adult Population Survey (report to U.S. Fish and Wildlife Service, August 28, 1999).
7. Lipman, Alison, Travis Longcore, Rudi Mattoni, and YinLan Zhang. Habitat Evaluation and Reintroduction Planning for the Endangered Palos Verdes Blue Butterfly (report to California Department of Fish and Game, June 1, 1999).
6. Mattoni, Rudi, Travis Longcore, Jeremiah George, Gordon Pratt, and Chris Nagano. Recovery Plan for the El Segundo Blue Butterfly (*Euphilotes battoides allyni*). Portland, Oregon (September 9, 1998).
5. Mattoni, Rudi, Travis Longcore, and Rick Rogers. 1998 Palos Verdes Blue Butterfly (*Glaucopsyche lygdamus palosverdesensis*) Adult Population Survey (report to U.S. Fish and Wildlife Service, June 10, 1998).
4. Mattoni, Rudi, Gordon Pratt, Travis Longcore, Jeremiah George, and Jan Leps. Interim Report 1997: Conservation Planning for the Endangered Laguna Mountains Skipper, *Pyrgus ruralis lagunae* (report to U.S. Forest Service, January 1998).
3. Pratt, Gordon, Rudi Mattoni, Travis Longcore, Jeremiah George, Cecelia Pierce, and Chris Nagano. Distribution of Quino Checkerspot Butterfly (*Euphydryas editha quino*) in Southern San Diego County and Related Observations (report to U.S. Bureau of Land Management, January 1998).
2. Mattoni, Rudi, Arthur Bonner, Jeremiah George, and Travis Longcore. 1997 Annual Report: Defense Fuel Support Point Revegetation, Chevron Pipeline Mitigation (report to U.S. Fish and Wildlife Service, August 1, 1997).
1. Mattoni, Rudi, Arthur Bonner, Jeremiah George, Travis Longcore, Catherine Rich, and Rick Rogers. 1997 Palos Verdes Blue Butterfly (*Glaucopsyche lygdamus palosverdesensis*) Adult Population Survey (report to U.S. Fish and Wildlife Service, June 30, 1997).

Popular Articles and Miscellaneous Reports

9. Longcore, Travis. Fire clearance. *Los Angeles Times* (April 29, 2000)
8. Longcore, Travis. Further enlightenment. *Malibu Times* (February 4, 1999).
7. Longcore, Travis. Ask campus community about changes. *Daily Bruin*, p. 12 (May 19, 1998).
6. Longcore, Travis, editor. Biological assessment: coastal sage scrub at University of California, Los Angeles. Prepared by Geography 123, Dr. Rudi Mattoni, Lecturer (unpublished report, December 1997).
5. Longcore, Travis. The Endangered Delhi sand dunes. *Western Tanager* 63(8):1-2 (1997).
4. Longcore, Travis. LAAS Year in review. *Western Tanager* 63(7):1-3 (1997).
3. Longcore, Travis. Election special: comparative excerpts from party platforms. *Western Tanager* 63(3):1-3 (1997).

2. Longcore, Travis. Big Birdathon Day. *Western Tanager* 63(1):1-3 (1997).
1. Rich, Catherine and Travis Longcore. Consultation issues at UCLA: landscape and construction (unpublished report, February 1996).

Conference Presentations

13. Longcore, Travis, Cor Zonneveld, Jorn Bruggeman, and Rudi Mattoni. *Tracking population responses of the endangered Palos Verdes blue butterfly to habitat enhancement using INCA (INsect Count Analyzer)*. The Ecological Society of America 87th Annual Meeting/Society for Ecological Restoration 14th Annual International Conference (Tucson, Arizona, August 4-9, 2002)
12. Longcore, Travis and John P. Wilson. *Applicability of CITYgreen urban ecosystem analysis software to a densely built urban neighborhood*. The Association of American Geographers 98th Annual Meeting (Los Angeles, California, March 19-23, 2002).
11. Longcore, Travis. *Obvious and insidious effects of sprawl on wildlife* (invited plenary speaker). Smart Growth for Californians and Wildlife, National Wildlife Federation and Planning and Conservation League (San Diego, California, May 19-20, 2001)
10. Longcore, Travis. *Ecological effects of fuel modification on arthropods and other wildlife in an urbanizing wildland*. Fire Conference 2000: The First National Congress on Fire Ecology, Prevention and Management (San Diego, California, November 27-December 1, 2000).
9. Longcore, Travis. *Response of terrestrial arthropod communities in coastal sage scrub to short-term climate change*. The Association of American Geographers 96th Annual Meeting (Pittsburgh, Pennsylvania, April 5-9, 2000).
8. Longcore, Travis. *Terrestrial arthropods and restoration: if you build it, will they come?* Society for Ecological Restoration Eleventh Annual Conference/Xerces Society Annual Meeting (The Presidio of San Francisco, September 23-25, 1999).
7. Longcore, Travis. *Putting the bugs in: assessing ecological restoration with terrestrial arthropods*. The Association of American Geographers 95th Annual Meeting (Honolulu, Hawaii, March 23-27, 1999)
6. Longcore, Travis and Catherine Rich. *419 acres: UCLA's natural history. 1. Land use, 2. Biological homogenization, 3. Island biogeography*. Poster series and display presented at California's Biodiversity Crisis: The Loss of Nature in an Urbanizing World (UCLA, October 24-25, 1998).
5. Mattoni, Rudi, Jeremiah George, Travis Longcore, and Gordon Pratt. *Scale and the resonating impact of an exotic plant*. Southern California Academy of Sciences Annual Meeting (California State University, Fullerton, May 2-3, 1997).
4. Longcore, Travis, Rudi Mattoni, Gordon Pratt, and Catherine Rich. *On the perils of ecological restoration: lessons from the El Segundo blue butterfly*. 2nd Interface Between Ecology and Land Development in California (Occidental College, Los Angeles, California, April 18-19, 1997).
3. Mattoni, Rudi, Travis Longcore, Jeremiah George, and Catherine Rich. *Down memory lane: the Los Angeles coastal prairie and its vernal pools*. Poster presented at 2nd Interface Between Ecology and Land Development in California (Occidental College, Los Angeles, California, April 18-19, 1997).
2. Longcore, Travis. *The role of science in Natural Community Conservation Planning*. Restoring Our

Commitment to Recovery in the Era of the Habitat Conservation Plan, Endangered Species Defense Coalition (Starr Ranch, California, July 30, 1996).

1. Longcore, Travis. *Mainland colonization by endemic insular taxa*. XXXth Annual Southwest Population Biology Conference (James Reserve, California, April 20–21, 1996).

INVITED PRESENTATIONS

South Coast Wildlands Project Missing Linkages Workshop, August 2002

University of Southern California, Department of Geography, February 2002

Santa Monica Mountains Conservancy, September 2001

California Native Plant Society, South Coast Chapter, August 2001

California State University, Northridge, Olivatt Library, April 2001

University of California Natural Resources Continuing Conference, Wrigley Institute for Environmental Studies, April 2001

Society for Ecological Restoration, California Chapter Annual Conference, October 2000

University of Stockholm, Department of Zoology, September 2000

University of Gothenberg, Department of Applied Environmental Science, September 2000

Lorquin Entomological Society, Los Angeles, California, June 2000

University of California, Los Angeles, Department of Geography, May 2000

Southern California Institute of Architecture, June 1998

Los Angeles Unified School District Target Science, "Butterflies in the City" Workshop Series, South Central Los Angeles Leadership Team, October 1998

PROFESSIONAL SERVICE

Referee, *Restoration Ecology*, *Journal of Research on the Lepidoptera*, *Environmental Management*

Independent Scientific Advisor (Quino checkerspot butterfly), County of San Diego, 2002

Conference Co-Chair, The Urban Wildlands Group and UCLA Institute of the Environment, *Ecological Consequences of Artificial Night Lighting*, 2001–2002

Member, Advisory Council, Yosemite Restoration Trust, 1999–present

Member, Recovery Team (Technical Subteam), Quino Checkerspot Butterfly, U.S. Fish and Wildlife Service, 1999–present

Member, Conference Steering Committee, UCLA Institute of the Environment, *California's Biodiversity Crisis: The Loss of Nature in an Urbanizing World*, 1998

Managing Editor, *Journal of Research on the Lepidoptera*, 1997–1999

Member, Recovery Team, El Segundo Blue Butterfly, U.S. Fish and Wildlife Service, 1997–1998

Member, Environmental Review Board, County of Los Angeles (appointed by Los Angeles County Board of Supervisors), 1997–present

Graduate Student Association Representative, UCLA Academic Senate Council on Planning and Budget, 1996–1999

Member, Graduate Affairs Committee, UCLA Department of Geography, 1995–1997

Member, Instructional Technology Committee, UCLA Department of Geography, 1993–1995

PROFESSIONAL AFFILIATIONS

Member, Ecological Society of America

Member, Association of American Geographers

Member, Society for Ecological Restoration

Member, Southern California Botanists

Member, California Botanical Society

COMMUNITY SERVICE

Baldwin Hills Park Citizens Advisory Committee, 2002

Newsletter Layout, Endangered Habitats League, 1998–2002

Editor, *Western Tanager*, newsletter of the Los Angeles Audubon Society, 1997

Vice President, Los Angeles Audubon Society, 1995–1997

Coordinator, Los Angeles Audubon Society Birdathon, 1996 (recognized by National Audubon Society, "Most Money Raised by a Rookie," September-October issue of *Audubon* magazine)

PUBLIC COMMUNICATION

Associated Press, *Boston Globe*, *Daily Breeze* (Torrance, California), *Daily Bruin* (Westwood, California), *Los Angeles Times*, *Metro Santa Cruz* (Santa Cruz, California), *Riverside Press-Enterprise* (Riverside, California), *Sacramento News and Review* (Sacramento, California), *San Jose Mercury News*, Scripps Howard News Service (Washington, DC), *The Christian Science Monitor* (Boston), *The Globe and Mail* (Toronto), *California Wild*, *Discover*, *Life*, *People*, *Science*, *Science News*, National Geographic Television ("America's Endangered Species: Don't Say Goodbye"), NBC Nightly News, ABC News, CNN Radio Español, National Public Radio ("Talk of the Nation"), BBC World Service

Lelah, Tova

From: Richard Turco [turco@ucla.edu]
Sent: Friday, December 20, 2002 1:07 PM
To: Tovah Lelah
Subject: Sage Hill Preserve



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Dear Tovah,

Please see the attached letter in response to the campus Long Range Development Plan.

Regards,

--

Richard P. Turco
Department of Atmospheric Sciences
Director, Institute of the Environment
University of California, Los Angeles
Los Angeles, CA 90095-1565
Ph: (310)-825-6936
Fx: (310) 206-5219
E-mail: turco@ucla.edu

Response to Comment Letter 16

Letter from Urban Wildlands Group (Travis Longcore & Catherine Rich), dated December 20, 2002

Response to Comment 16-1

This comment contains introductory information, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. Therefore, no response is required.

Response to Comment 16-2

In response to this comment, the 2002 LRDP Draft EIR (Volume 1, Section 3.4.4 [Open Space], page 3-17, first paragraph) has been revised as follows:

Open space is an essential component of the aesthetic and social life of the campus. Of the total campus area of 419 acres, approximately 152 acres (or 36 percent), consist of green space, including landscaped buffer areas surrounding the northern, eastern, and western boundaries of the main campus; many open space preserves; landscaped courtyards, plazas, and gardens; recreational areas; and campus entries. ~~All~~The majority of the plant life on the UCLA campus has been introduced along with the development of buildings, and the majority of the vegetation consists of nonnative rather than native species. Numerous varieties of imported trees and shrubs that have adapted to the southern California climate have become the foundation of the campus reputation for a garden-like environment.

Response to Comment 16-3

In response to this comment, the 2002 LRDP Draft EIR (Volume 1, page 4.1-2, first paragraph under heading "Campus Landscaping") has been revised as follows:

The site of the UCLA campus was originally located on a treeless, chaparral-covered site included a variety of native and non-native plant communities that have been described in prior LRDPs as "a treeless chaparral," and some plants associated with those communities still persist in the vicinity of Stone Canyon Creek and in the Northwest zone. Landscaping of the campus began in 1925, with approximately 3,600 trees planted by 1928. Professor J.W. Gregg originally designed the landscape to create what was referred to as the "California look." Ralph D. Cornell was appointed Campus Landscape Architect in 1937 and continued to serve UCLA as a consultant until 1972. His firm (Cornell, Bridgers, Troller, and Hazlett) designed many of the major landscape projects on campus, including numerous basic features that provide a unifying landscape motif, although most of the initial plantings have been modified over the last seven decades as the campus evolved from its beginnings to the internationally recognized teaching, research, and public service institution it is today. Along with pedestrian pathways and open areas, the ornamental landscaping continues to complement the different styles of architecture found on campus. Several areas of lush landscaping are found within the University's grounds; however, the majority of the plant life on the campus is ornamental, rather than native, and ~~all~~most vegetation has been introduced coincident with the development of buildings.

Response to Comment 16-4

As noted in Response to Comment 16-3, in response to this comment, the 2002 LRDP Draft EIR (Volume 1, page 4.1-2, first paragraph under heading "Campus Landscaping") has been modified as follows:

...Several areas of lush landscaping are found within the University's grounds; however, the majority of the plant life on the campus is ornamental, rather than native, and ~~all~~ most vegetation has been introduced coincident with the development of buildings.

Response to Comment 16-5

Open spaces depicted on Figure 4.1-1 (Open Space and Pedestrian Pathways) of the 2002 LRDP Draft EIR (Volume 1, page 4.1-3) were noted to consist primarily of plazas, courts, gardens, walkways, recreational areas, campus entries, and other visual resources considered essential components of the aesthetic and social life of the campus. Figure 4.1-1 illustrates significant open spaces as well as linked pedestrian pathways. The four-acre hillside area between Lot 11 and the Childcare Center in the Northwest zone of the campus is not designated as a formal plaza, garden, or recreational area, and is not considered an essential visual resource for the campus. This area has not been designated as an area of unique aesthetic value due to its historic or specialized use, and while the hillside area may be used informally as a teaching resource for various natural sciences, the campus has made no formal determination that this area may not be developed as need arises. Development of this area would be, however, subject to the Stipulated Use Agreement. Figure 4.1-1 is not intended to designate areas that receive "more official University instructional use than other areas depicted on the map," but rather to illustrate essential components of the aesthetic quality of the campus. Therefore, because this area has not been designated as a significant visual resource, it is not included on Figure 4.1-1.

Response to Comment 16-6

The edges of the campus are planted primarily with eucalyptus, Canary Island pines, and camphor trees, as well as a variety of understory shrubs. Twelve Eucalyptus trees and other plantings were removed in front of the UES building along Sunset Boulevard to improve the safety of the drop-off areas in front of the UES and the Fernald Childcare Center and to better accommodate parking needs. The replacement plan included renewing the one-block portion of landscape buffer along Sunset Boulevard in accordance with mitigation measures D-1.1 and D-1.4 of the 1990 LRDP Final EIR. The width of the planting strip was not significantly reduced in this area. The campus consulted with the City of Los Angeles regarding the replacement tree species along the one-block portion of Sunset Boulevard. Fifty-two Sycamore and Canary Island pine trees were planted as replacements. In addition, a large number of understory shrubs, including Pittosporum and Carolina Cherry, were planted as part of this project. The campus maintains a landscaped buffer at the western, northern, and eastern edges of the main campus, which includes Sunset Boulevard, to provide an attractive perimeter and shield neighborhood uses from the campus. Wherever possible the campus strives to provide landscaping that screens to the greatest extent feasible views of the campus from the surrounding neighborhoods. However, it is not always practicable to replace lost landscaping with trees and plants of equal size to those that were removed. The campus

believes that in due time, as the plantings grow and mature, the desired screening effect will be achieved. The landscaping provided at the campus edges enhances, as intended, the visual quality of the borders. However, the 2002 LRDP Draft EIR (Volume 1, page 4.1-11) will be amended as follows:

The edges of the campus are planted primarily with mature eucalyptus, Canary Island pines, camphor trees, or other landscaping that enhances the visual quality of the campus borders.

Response to Comment 16-7

Please see Response to Comment 16-6 above. The campus has provided landscaping as indicated along the western, northern, and eastern edges of the campus and makes every attempt to provide an attractive perimeter and buffer to the surrounding residential uses. The width of this landscape buffer is not prescribed and varies from location to location; it is not possible or feasible to provide the identical buffer along all portions of the campus edges and still meet campus needs.

Response to Comment 16-8

Before the design review process for a proposed building begins, University of California procedures require preparation of a Project Planning Guide. This document establishes the program and budget for a proposed building. It is this program and budget that fundamentally establishes the parameters that are to be addressed by the physical design process for any particular building proposal.

The design review process at UCLA is accomplished through a variety of internal Capital Programs department meetings and ultimately by committees that include campus executive management. Preliminary design review occurs during the design development process for capital projects. This process consists of many meetings between campus design staff and project management staff and consulting architects. During these meetings, evaluation of factors such as site, compatibility with adjacent uses, building mass and form, roof profile, architectural details and fenestration, texture, color, quality of building materials, landscaping, and focal views occurs. This process is iterative and involves building occupants and other campus users affected by the particular project. Once a design is formulated, it is presented as appropriate to the Campus Capital Projects, and Health Sciences Capital Projects groups. These groups consist of Capital Programs and campus executive management and are internal working meetings. Following these reviews, projects are presented to the Chancellors Capital Planning Advisory Committee, and as appropriate to the Academic Senate Council on Planning and Budget. These committees consist of the Chancellor, Executive Vice Chancellor, and other campus Vice Chancellors, and executive management. These committee meetings do not typically include students.

Community Leader Meetings are typically held quarterly by UCLA's Office of Local Government and Community Relations with the involvement of Capital Program and other executive management staff to advise and solicit comments from neighboring organizations and other interested individuals. Student

government representatives attend these meetings from time to time. Other public participation in the design process occurs on an informal basis as appropriate for particular projects that may affect views from off-campus or otherwise impact off-campus uses. This participation typically occurs prior to the CEQA public review process, and modifications to project designs have been made in response to public comments received. All individual development projects are subject to CEQA review at the design stage of project development, prior to project approval, and must fully comply with all applicable laws and requirements, such as CEQA, and all campus programs, practices, and procedures and including 2002 LRDP design objectives.

Response to Comment 16-9

The approximately four-acre open hillside area in the Northwest zone is not designated in the 2002 LRDP as a formal open space. These designations are made based on historical use and recognized value as essential components of the aesthetic and social life of the campus. On May 15, 2001, the Executive Committee of the Institute of the Environment on campus requested consideration for the creation of a "Sage Hill Nature Reserve" on this four-acre parcel. In a response dated August 28, 2001, the campus Executive Vice Chancellor indicated that while the undeveloped area is currently accommodating academic uses with regard to teaching and research in the natural sciences, the campus could not place more restrictive conditions on the use of the land than detailed in the 1990 LRDP due to the campus's geographic constraints of available land. That response further indicated that the LRDP process, which requires periodic reconsideration of the entire campus land use plan, would consider proposals for alternative uses of the site, but also indicated that the campus felt it prudent to preserve as much flexibility as possible in considering land use designations and balance them with campus needs. Therefore, the area requested cannot feasibly be set aside now as an open space preserve. Any future development in this area would be guided by LRDP objectives. The LRDP is the land use plan for the campus and other than the NHIP does not designate sites for future development. At such time that a development proposal is appropriate for the area, it would be reviewed in accordance with CEQA.

Response to Comment 16-10

The 1990 LRDP EIR Mitigation Measure D-1.1 established the existing campus requirement for the preparation of a tree replacement plan: the measure required the identification of specimen trees and landscape elements, and which of these trees and elements would be removed, relocated, and retained. The comment incorrectly asserts that Mitigation Measure D-1.1 required 1:1 replacement of removed specimens: it specified no tree replacement ratio.

EIRs prepared for subsequent projects under the 1990 LRDP—such as the Academic Health Center Facilities Reconstruction Plan—included mitigation measures with tree replacement ratios; however,

these measures reflected options available for the circumstances surrounding the project sites in question. As described in Response to Comment 8-6, 1:1 tree replacement will not always be possible or feasible on campus, given the development that has occurred and the remaining land available on the campus, along with the accompanying concerns regarding the health of replacement trees. The comment incorrectly suggests that aside from retaining a 1:1 tree replacement ratio (which was never required by the 1990 LRDP), the only effective mitigation for potential impacts to habitat for raptors and migratory birds would involve setting aside another location on the campus, and the comment requests that the unused area within the Benign Use Zone be set aside. However, the comment does not offer any evidence that implementation of 2002 LRDP EIR MM 4.3-1(c) (Volume 2, page 4.3-4) would result in a significant, unmitigated impact. The 2002 LRDP Draft EIR determined (Volume 1, pages 4.3-9–4.3-12) that implementation of the tree replacement plan, in conjunction with following campus programs, practices, and procedures related to protection and maintenance of trees to remain in place, would, in the opinion of University biologists, ensure that potential impacts to nesting opportunities would be mitigated to a less-than-significant level. In addition, the majority of the area requested by the comment to be set aside is not proposed for development at this time; however, the area requested cannot feasibly be set aside now as an open space preserve. As stated by Executive Vice Chancellor Wyatt R. Hume in his letter of August 28, 2001, to Professor Rich Turco, “the UCLA campus is far smaller than the campuses of its sister University of California institutions. Given the constraints imposed by [the campus’] limited geographic area, the Chancellor is not prepared to now place more restrictive conditions on the use of the land than are detailed in the LRDP.” However, the restrictions on land use proposed under the 2002 LRDP include setting aside Stone Canyon Creek Area, the Mildred E. Matthias Botanical Garden, and the area surrounding the University Residence—all areas recognized by the comment as “significant” for bird and vertebrate diversity—as open space preserves. These significant areas would not, therefore, be subject to development and would help, along with the preparation of tree replacement plans (as required by 2002 LRDP EIR MM 4.3-1(c)) to ensure that the campus continues to provide potential nesting opportunities for raptors and migratory birds.

Response to Comment 16-11

This comment is acknowledged. However, it is unclear whether the document in question contains a comment directed at the physical environmental effects of the 2002 LRDP, as analyzed in the 2002 LRDP Draft EIR, or is a comment on the adequacy of the 2002 LRDP Draft EIR as an informational document in accordance with the requirements of CEQA. In addition, it is impossible to discern the specific concerns of the comment from the text of the document. While this document will be included in the administrative record for the 2002 LRDP, absent a specific comment on the content or adequacy

of the 2002 LRDP Draft EIR, it is impossible to prepare a response, and CEQA does not impose such a requirement.

Response to Comment 16-12

All outdoor lighting installed on the campus must meet the design and performance standards set forth in the UCLA Mechanical-Electrical-Plumbing and Design Standards manual (MEP). The standards are overseen and enforced by the Capital Programs Campus Architect and Director of Engineering. The MEP states that all campus lighting poles and fixtures shall be of a style and quality harmonious with that specific area of campus. Performance standards in the MEP further require that all fixtures be shielded as appropriate to the fixture and use, and that lighting levels shall be maintained in accordance with the latest Illuminating Engineering Society recommendations, upper range.

To make sure the appropriate lighting levels are achieved for new projects on campus, a computer photometric point by point layout is generated by an electrical engineer, based on specifications from the lighting designer or manufacturer. The plan illustrates the most efficient type and placement of fixtures to achieve the lighting level required for a given site plan to maintain campus safety and security.

The campus standard "acorn" fixtures used for streets, walkways, and other nonrecreational uses use an energy-efficient 150- or 100-watt, high-pressure sodium lamp, which produces a yellowish, low-glare light source. This lower wattage fixture allows for a lower mounting height, with spacing of approximately 70 feet on center. These fixtures utilize two types (a type 3 and a type 5) of refractors to bend and redirect light emitted by the lamp arc tube to produce efficient on the ground light patterns. The lighting distribution pattern of a type 3 refractor is an asymmetrical, roughly rectangular, bat wing shape that is used for lighting streets, pathways, and sidewalks. Type 5 produces a symmetrical round or squarish pattern, and is used where pathways or streets cross, and for general and parking lot lighting. These fixtures also utilize a top redirecting Alzak reflector disc placed in the top of the globe over the light bulb. This catches the upward light emitted and redirects it outward and downward producing light cut off at angles above 90 degrees from vertical. The average lighting level produced is 1 to 2 foot candles, depending on placement and use. The light pattern on the ground is very uniform, with no "dark spots." This helps promote campus safety and security as shadows between fixtures are nearly eliminated.

To fully shield these fixtures *"in such a manner that light emitted by the fixture, either directly from the lamp or indirectly from the fixture, is projected below a horizontal plane running through the lowest point on the fixture where light is emitted"* as the comment suggests, would require the introduction of non light emitting shielding in and around the interior lamp and or exterior of the globe so as to make the fixture a highly inefficient

unit. It would have to be completely shielded all the way down to its bottom because it still emits light “directly or indirectly” through the bottom of globe. These “shielded” fixtures then would only be capable of producing a far lower level of emitted light, and, in order to maintain the level of illumination necessary for campus safety and security would result in the need to place of the fixtures approximately 10 to 20 feet apart, in order to prevent the creation of shadows and dark spots along campus streets and walkways. This could represent an approximate six-fold increase in the number of fixtures on campus. In order to maintain lighting levels for public safety and the additional costs involved, the proposal suggested by the comment is infeasible.

Response to Comment 16-13

In response to this comment, the 2002 LRDP Draft EIR (Volume 1, page 4.3-1, paragraph 3) has been modified as follows:

The comment letter from The Urban ~~Wildlife~~ Wildlands Group, Inc. requested that the EIR address potential impacts to wildlife.

The campus regrets the error.

Response to Comment 16-14

As stated in the 2002 LRDP Draft EIR (Volume 1, page 4.3-3, under subheading “Northwest Zone”):

...In addition, this [the Northwest] zone contains a four-acre hillside between Veteran Avenue and Parking Lot 11. Portions of this area, once used to graze livestock, remain undeveloped. While Longcore *et al.* (1997) previously reported coastal sage scrub in the Northwest zone, the vegetation observed in this zone during December 2001 and April 2002 surveys was interspersed with various exotic ornamental species and was determined to be of sufficiently low quality not to be considered a sensitive natural community.

The University’s expert biologists believes that the combination of several factors, including the previous disturbance (including complete clearing) of the site, continuing disturbance of the site, the fragmented nature of coastal sage scrub species and the number and extent of exotics, and the proximity of the site to noise sources (Veteran Avenue and surrounding campus uses), contributes to this determination. The University’s expert biologists therefore disagree with the comment. In addition, regardless of the characterization of this area as a sensitive natural community, there are no proposals for development in this area at this time.

Response to Comment 16-15

In response to this comment, page 4.3-2, Paragraph 2 of the 2002 LRDP Draft EIR (Volume 1) has been modified as follows:

...The majority of the vegetation on the UCLA campus consists of nonnative rather than native species, and ~~all~~ most of the vegetation has been introduced along with the development of buildings....

Response to Comment 16-16

In response to this comment, in the 2002 LRDP Draft EIR (Volume 1, page 4.3-2, last sentence of the second paragraph) has been revised as follows:

Stone Canyon Creek, the only area on campus in which wetlands are considered possible, would not be characterized as a federally protected wetland, ~~because less than 50 percent of the dominant plant species at the site were rated as facultative or obligate due to the lack of plants characterized as hydrophytic~~ according to the *National List of Plant Species That Occur in Wetlands* (U.S. Fish and Wildlife Service, 1988), which is one of three mandatory criteria to designate an area as a jurisdictional wetland (U.S. Fish and Wildlife Service, 1988; refer also to Appendix 5, Tables A5-1A and A5-1B).

As shown in Appendix 5 (Floral and Faunal Lists) to the 2002 LRDP Draft EIR, hydrophytic plants and soils were identified in the Stone Canyon Creek area; however, as stated on page 4.1-4 and illustrated in Figure 4.1-1 (Open Space and Pedestrian Pathways) (Volume 1, page 4.1-3), the Stone Canyon Creek Area is designated and will be maintained as an open space preserve. No development would occur in this area, no impact to Stone Canyon Creek or the immediate surrounding area would occur; therefore, no delineation (which is conducted to ascertain the extent of impacts to a potential jurisdictional area) would be necessary.

Response to Comment 16-17

Refer to Response to Comment 16-10 for a discussion of the feasibility of maintaining the area described by the comment as an open space preserve. The comment is incorrect in the assertion that the conclusions in the 2002 LRDP Draft EIR (Volume 1, Section 4.3 [Biological Resources]) are not supported by any evidence or by study of the site. As stated on page 4.3-1 in Volume 1, in addition to reviews of previous studies and environmental documentation, which are included in Chapter 8 (References) of Volumes 1 and 2, "EIP biologists, botanists, and avian specialists performed campus surveys on December 5, 2001, and April 22, 2002, to validate existing data sets." The species lists are provided in the appendices (Volume 1a, Appendix 5 [Floral and Faunal Lists], and Volume 2, Appendix 5 [Floral and Faunal Lists]). The densely planted areas of the Northwest Campus zone, the University Residence, Stone Canyon Creek Area, and the Mildred E. Mathias Botanical Garden were emphasized in these surveys—the Northwest Campus zone bore particular scrutiny—although the planted areas throughout the campus were also surveyed.

The assertion to which the comment refers is, therefore, based upon a review of these previous environmental documents and studies, as well as surveys of the areas discussed. In the expert opinions of the University biologists and botanists, plant species associated with coastal sage scrub were present; however, the level of disturbance, the discontinuity, and the number and density of exotics observed in the scrub areas during the surveys yielded the determination, as stated on page 4.3-3 of Volume 1, that

the coastal sage scrub was “of sufficiently low quality not to be considered a sensitive natural community.” As described on the same page and by the comment, no question exists that this area has been disturbed: in addition to probable grazing activity, page 3 of the article attached to the comment letter (Gould, “The Last Wild Space in Westwood,” p. 3) states that the hillside had been previously cleared. Research and observation form the basis for the conclusions in the 2002 LRDP Draft EIR, not the question of past disturbance.

The comment also requests the preparation of a 1-meter-scale vegetation map; however, the 2002 LRDP Draft EIR is a programmatic analysis of the potential level of development on the campus as a whole. No specific development proposals other than the NHIP (which was evaluated in Volume 2) have been set forth, and the NHIP would not be constructed in the areas west of Charles E. Young Drive West: construction in this area would occur on existing lots (Parking Lot 15 and the bone yard). Unless and until the campus proposes a development within the area described by the comment, it is not necessary to provide an evaluation of the specific environmental effects arising from such a project. If, however, the campus should propose such a development in the future, subsequent environmental analysis would be undertaken, pursuant to Section 15168(c) of the *CEQA Guidelines*, to evaluate the potential effects of the specific development proposed.

Response to Comment 16-18

Comment noted. As stated in Section 15125(a) of the *CEQA Guidelines*, “an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation was published.” At the time the notice of preparation for the 2002 LRDP EIR was published (and for many years prior), Stone Canyon Creek has been part of the storm drainage/conveyance system, carrying surface flows from areas north of the campus into the campus subterranean storm drainage system.

Response to Comment 16-19

In response to this comment, the relevant reference (Volume 1, pages 4.3-16 and 8-3; and Volume 2, pages 4.3-14 and 8-3) has been revised as follows:

Hickman, James C., ed. ~~Jepson~~. 1993. *The Jepson Manual:—Higher Plants of California*. University of California: Berkeley.

Response to Comment 16-20

Refer to Response to Comment 16-10 for a discussion of the classification of the hillside area in the Northwest Campus zone as an open space preserve. Many areas on the campus are used informally in the course of academic instruction; however, the site described by the comment is not maintained by the

campus for the purpose of academic instruction: campus areas specifically maintained for such studies include the Mildred E. Mathias Botanical Garden and the Stunt Ranch Reserve, off campus.

The commenter included several documents as attachments to this letter. Where specifically referenced in a comment, these documents have been reviewed to provide context for a response. Regarding the remaining items, such as resumes, it is unclear whether the documents in question contain a comment directed at the physical environmental effects of the 2002 LRDP, as analyzed in the 2002 LRDP Draft EIR, or is a comment on the adequacy of the 2002 LRDP Draft EIR as an informational document in accordance with the requirements of CEQA. While the attached documents will be included in the administrative record for the 2002 LRDP, absent a specific comment on the content or adequacy of the 2002 LRDP Draft EIR, it is impossible to prepare a response to these attachments, and CEQA does not impose such a requirement.

Tovah Lelah, Assistant Director
UCLA Capital Programs
1060 Veteran Avenue, Box 951365
Los Angeles, CA 90095-1365
E-mail: tlelah@ucla.edu

Dear Ms. Lelah:

I am the Director of UCLA's Institute of the Environment (IoE). In that role, and as a spokesman for a number of our affiliated faculty and staff, I would like to record the following comments with respect to the campus' Long Range Development Plan and associated Draft Environmental Impact Report.

Specifically, we are concerned that the hillside located between Parking Lot 11 and Veteran Avenue is not listed as a rare habitat zone. This parcel of land, amounting to roughly 4 acres, is one of the few remaining semi-native open spaces on the campus. Indeed, for that reason the area is often utilized as a focal point for environmental education in a number of courses administered by the Institute, Geography, and other departments. Moreover, faculty research has been, and continues to be carried out at the site. We request that you reconsider its value, and include a description of the parcel, and the corresponding instructional and research programs that have taken advantage of this unusual resource, in the Long Range Development Plan.

We also suggest that, in order to prevent further aesthetic and biological degradation of the site, while preserving access to campus programs, the four-acre parcel be designated as a campus preserve. Hopefully, this will mitigate damage that might otherwise have occurred with continued development of that part of the campus.

Thank you for your consideration.

Richard Turco
Professor of Atmospheric Sciences
Director, Institute of the Environment

17-1

17-2

17-3

Response to Comment Letter 17

E-mail from IoE (Richard Turco), dated December 20, 2002

Response to Comment 17-1

This comment contains introductory information, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. Therefore, no response is required.

Response to Comment 17-2

Refer to Responses to Comments 16-10 and 16-20 for a discussion of the use of areas in the Northwest campus as instructional facilities.

Response to Comment 17-3

Refer to Responses to Comments 16-9 and 16-10 for a discussion of the feasibility of designating a portion of the Northwest Campus zone as a campus open space preserve.

Pauline DiPego
10555 Strathmore Drive
Los Angeles, California 90024
310-474-7011

DECEMBER 12, 2002

UCLA ENVIRONMENTAL PLANNING
TOVA LELAH

Re: Draft Environmental Impact Project # 2002031115

DEAR TOVA LELAH:

Grid lock, noise, parking problems, and air pollution generated by the presence of UCLA arguably nullify the findings of the "DEIR: Housing Infill Project, Nov. 2002."

Overlooked were the neighborhoods surrounding the proposed project, particularly Little Holmby, EAST of UCLA at Hilgard Avenue and Strathmore Drive. The bus stop at this location presents serious problems for the community. Municipal buses from L.A., Culver City, and Santa Monica glut the area. Ostensibly transporting commuters to UCLA, these buses need rerouting, layovers, and staging on UCLA GROUNDS.

Rather than admitting thousands of new students and building new structures, UCLA and California would better serve L.A. by concentrating on traffic abatement. Commuters near UCLA live with CAL TRANS'S euphemism for "rush hour," "the multi-hour-commuter period." That's doublespeak for an eight-hour-a-day traffic nightmare already.

Inadequate parking space plagues the area. It is the responsibility of UCLA to provide parking for students and employees ON UCLA GROUNDS.

The DEIR:Northwest Housing Project of Nov. 2002, failed to address these critical issues. For the sake of L.A., rethink.

RESPECTFULLY,

Pauline DiPego
PAULINE DI PEGO
Westwood Resident

18-1

18-2

18-3

18-4

18-5

EnvPin

From: Patlan, Richard
Sent: Friday, December 20, 2002 1:55 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 20 2002 11:08AM

Name: Gray, Toni

Address: 10538 Strathmore Drive

City: Los Angeles

State: CA

ZIP: 90024

Organization: homeowner

Phone: 310-475-5062

Email: gtoni2882@aol.com

Date Register: Dec 20 2002 11:08AM

Comment: I have a FAX email being sent to you...

Response to Comment Letter 18

Letter from Pauline DiPego, dated December 12, 2002

Response to Comment 18-1

Consistent with CEQA and *CEQA Guidelines*, the 2002 LRDP Draft EIR analyzed the potential or significant environmental effects of the proposed 2002 LRDP. While the campus has evaluated a range of potential mitigation measures to reduce significant LRDP project impacts, and will implement all feasible mitigation measures, construction and operation of the 2002 LRDP would result in the following significant and unavoidable impacts: Air Quality (construction and operation); Noise (construction), and Traffic and Circulation (construction and operation) as identified in the 2002 LRDP Draft EIR (Volume 1, page 2-5). Volume 2, page 2-4, identified significant and unavoidable impacts related to the Northwest Housing Infill Project, which include Air Quality (construction); Noise (construction), and Traffic and Circulation (construction and operation).

Response to Comment 18-2

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 to 4.13-18), the University implemented a transportation demand management program in 1984. The 1990 LRDP imposed a cap on the number of on-campus parking spaces (at 25,169) and vehicle trip generation (at 139,500 average daily trips). In conjunction with the adoption of the 1990 LRDP update, University funded installation of the Automated Traffic Surveillance and Control system at 10 intersections around the campus. Additional installations have been funded in conjunction with approval of individual projects. To mitigate traffic impacts that would result from implementation of the 2002 LRDP, the 2002 LRDP Draft EIR proposed to fund a fair share of additional signal enhancements (the Adaptive Traffic Control System) at 12 intersections near the campus. See Section 4.13 (Transportation/Traffic) of Volume 1 for a discussion of feasible mitigation measures to improve traffic conditions. Thus, the University has contributed to the promotion of alternative transportation programs and improvement of traffic signals, which have substantively improved traffic flow in the Westwood area, and has proposed a range of mitigation measures to address impacts that would result from implementation of the 2002 LRDP.

Response to Comment 18-3

As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 to 4.13-18), the University implemented a transportation demand management program in 1984. The 1990 LRDP imposed a cap on the number of on-campus parking spaces (at 25,169) and vehicle trip generation (at 139,500 average daily trips). In conjunction with the adoption of the 1990 LRDP update, University funded installation

of the Automated Traffic Surveillance and Control system at 10 intersections around the campus. Additional installations have been funded in conjunction with approval of individual projects. To mitigate traffic impacts that would result from implementation of the 2002 LRDP, the 2002 LRDP Draft EIR proposed to fund a fair share of additional signal enhancements (the Adaptive Traffic Control System) at 12 intersections near the campus. See Section 4.13 (Transportation/Traffic) of Volume 1 for a discussion of feasible mitigation measures to improve traffic conditions. Thus, the University has contributed to the promotion of alternative transportation programs and improvement of traffic signals, which have substantively improved traffic flow in the Westwood area, and has proposed a range of mitigation measures to address impacts that would result from implementation of the 2002 LRDP.

Response to Comment 18-4

The comment has suggested that UCLA provide additional parking spaces on campus to address what the commenter believes to be an "inadequate" supply of parking. Although these structures are not part of the 2002 LRDP, with the completion of the Westwood Replacement Hospital, the Southwest Campus Housing and Parking, and the Intramural Field Parking Structure projects (which have been previously approved and/or are under construction) the on-campus supply of parking would increase by approximately 3,552 spaces. As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-88 to 4.13-92), implementation of the 2002 LRDP would not result in inadequate parking capacity on the UCLA campus. However, as noted in Response to Comment 18-3, in order to limit the traffic impact of campus growth and to promote the use of alternative transportation to campus instead of single-occupant vehicles, the 1990 LRDP included a cap on on-campus parking spaces of 25,169 spaces. Inclusion of PP 4.13-1(b) commits the campus to continue to maintain the parking cap throughout the planning horizon of the 2002 LRDP. The University believes that the combination of on-campus parking and the availability of alternative transportation measures represents a considered balance between the need to accommodate parking demand while reducing vehicle trips to campus and resulting traffic congestion. This combination of parking and alternative transportation adequately serves the needs of students, employees and visitors to access the campus, and does not result in a significant impact associated with a shortage of parking which requires additional mitigation. For this reason, the provision of additional on-campus parking spaces in excess of the existing parking space cap does not address a significant impact of the 2002 LRDP, is not necessary as mitigation, and may result in additional traffic impacts on area streets.

Response to Comment 18-5

The 2002 LRDP Draft EIR was prepared in full accordance with all substantive and procedural requirements for a legally adequate EIR, including, but not limited to, the requirements set forth in

CEQA and the *CEQA Guidelines*. With respect to mitigation measures, and consistent with Section 15126.4 of the *CEQA Guidelines*, the 2002 LRDP EIR describes all feasible mitigation measures that could minimize significant adverse impacts. The mitigation measures are fully enforceable and are consistent with all applicable requirements. Refer to Responses to Comments 18-1 through 18-4 for discussions regarding the specific issues raised by the comment.

Lelah, Tova

Comment Letter 19

From: GToni2882@aol.com
Sent: Friday, December 20, 2002 5:31 PM
To: Lelah, Tova
Cc: JWEISS@council.lacity.org; Zev@bos.co.la.ca.us; jkambham@council.lacity.org; elincove@council.lacity.org; senator.kuehl@sen.ca.gov; lori.newman@sen.ca.gov; assemblymember.koretz@assembly.ca.gov; jay.greenstein@asm.ca.gov; pverdon@firstregional.com; nrozengurt@mednet.ucla.edu; Hwpoa@aol.com

Subject: corrected EIR reply -read this one

Tovah:

I was in such a rush to send this to you earlier today, there are some corrections on the last page that I needed to make. Please accept this copy.

Thank you,

Toni Gray
 475-5062

UCLA Capital Programs
 Attn: Environmental Planning
 1060 Veteran Ave.
 Los Angeles, CA 90095-1405

Reply to UCLA EIR NW Infill Project (Also by FAX to 310-206-1510)
 References cited at the end.

I am a resident just east of UCLA at 10538 Strathmore Drive. I have been in my home since 1986. Rather than cite the same information from letter from my neighbors, I want to go on the record that I agree with all in letters written by Mr. Verdon and Dr. Rozengurt and with every speaker who spoke at the recent meeting at the faculty center. UCLA must be a good neighbor and keep their noise to themselves and congestion to a minimum.

For us "lay persons" to just decipher all the "EIR lingo" is daunting at best. However, as a layperson I note many errors and omissions that I will cite later in this correspondence. If I see those glaring problems, what other problems are buried under the technical jargon and presentation? I assert that this EIR is flawed and that the "edict" of the additional students at UCLA is flawed and unjust.

Over the years, I too have suffered a decline in quality of life due to UCLA growth and inattention to neighborhood issues. It is rather like sleeping next to an elephant. Now we must address a draft EIR because the state miscalculated the student forecast. I urge our elected representatives to examine, in detail, the gross miscalculation by the state. What has changed that would cause such an error? Are we serving the young people of California or are these students coming from somewhere else? Why is a state nearly in bankruptcy funding such an effort? What plans are in place to get students in and out of UCLA more in keeping with the modern university it is today?

As individual homeowners we are not equipped to counter the professional maneuvers by the multiple expert firms hired to state UCLA's case. These experts are loyal to their employer and paid for with our tax money to go against the local residents who have no representation. None of us can meet the number and level of experts that the state can hire. The onslaught is simply unjust. Will the state pay for our experts to counter? If such a need for more students is there, then new UC locations need to be found.

Our only recourse is to our elected representatives and urge them to intercede on our behalf and hold the UC Board of Regents and relevant state forecasting department accountable and urge them to stop this increase in an already congested location. The fact that the state miscalculated the student forecast is not a reason to overburden an already clogged site. For the local area to suffer more congestion as a quick answer to their planning problems is wrong. There are other choices.

12/20/2002

What does in real term 4000 FTE increase really mean? This sounds like fancy accounting to disguise the real number of persons who will be on campus. To think that adding thousands more students will have minimal impact on the neighborhood does not even meet the simplest common sense test. If an there was not a potential environmental impact, and EIR would never have been required. Will these 4000 FTE's (who are really 5,000 or 6,000 or 7,000 real bodies?) not arrive and unpack in cars, not want to go anywhere once here, have visitors or have pizzas delivered etc. etc. ? The summer programs already have parents dropping off participants to the dorms and the traffic is backed up for miles for hours. How is it that this draft EIR says there is minimal impact as these programs change participants every few weeks in the summer? Please, use your common sense and see through this analysis. Why not build this housing for the nearl y 3,000 students who are forecasted to want to be on campus, provide a campus experience and mitigate the current congestion?

19-8

Since I am east of campus, my daily focus is also the noise/air pollution generated by the out of control bus stop at Hilgard/Strathmore. While it was identified as a community issue in the draft EIR, the noise measurement location is unidentifiable with the map provided (EIR 4.9-3) and where is the raw data? Where are the mitigation plans? Noise levels in EIR 4.9 are gathered from Federal Highway Administration Models and not from actual data collected at the site. How is that accurate? Where is the raw data for that calcuation and how was it gathered, measured etc? We must insist that accurate noise/air pollution data from independent sources be addressed with plans for mitigation.

19-9

The noise levels noted in EIR 5.9-11 has three errors:

19-10

- 1) It is already over the legal limit per LA City Municipal Code for R1 (Ref. #1) Where is the mitigation for this infraction?
- 2) How could a 63.6 db be averaged when there are over BBB 900 bus accelerations at 90 db each there daily plus the noise from MTA and the back-up beeping. That math does not work with any calculator.(Ref. #2)
- 3) There is a additive effect of multiple buses at the same time (Ref. #3). Where is that accounted for?
- 4) There is a 10% increase with air conditioning running (Ref. #4). I see no incorporation of this fact.
- 5) Wyton to Westholme on Hilgard is R1 zoned, not multi-family as in the table.

19-11

19-12

19-13

19-14

Further, the draft EIR notes lots of bus capacity for this student increase. I cannot even imagine how this statement could be concluded in light of the following:

19-15

- * New student housing is to be in Northwest Corner of campus, so how does that work with BBB capacity?
- * Does anyone really believe those students will stay put on campus? They will have visitors, go shopping, figure out how to use a car (they are resourceful UCLA students afterall), have pizza delivered etc. etc.
- * There is no service from Santa Monica/Culver City that takes students any further north than the Hilgard/Strathmore location
- * The buses are quite busy during peak hours but nearly empty most other times of the day. Therefore, if student rider number were to increase (which they have not in the past according to information given to us from UCLA), they would increase at peak hours, requiring more buses. The extra capacity is all the empty buses sent up here at odd hours.

19-16

19-17

19-18

If there has not been an increase in student ridership and the neighborhood population has been stable (or in fact slightly decreasing) for over 50-60years why does UCLA allow BBB to increase the buses on various schedules from 14% to 155%? Even though there has no doubt been an emphasis on increasing ridership and limiting cars, the ridership has not increased. So why are there so many buses? Clearly most are empty.

19-19

Currently, this area experiences over 1000 bus accelerations daily not to mention the annoying back-up beeping. BBB sends the majority of its it buses to the site daily empty and leave empty as well. These BBB each decelerate with brake noise for the U-turn, then accelerate to make the U-turn, then accelerate to position bus (often with back up beeping) and the accelerate to leave. This is nearly 900 diesel bus accelerations daily from BBB alone. Often multiple buses at a time from before 7 am to well past midnight.

19-20

An accelerating diesel bus generates at least 90 decibels. Even though I cite a reference for this, however, there are multiple sources on the Internet to verify this number. Why is it was not even calculated in the draft EIR? Buses running air conditioning will generate 10% more decibels and multiple buses add 3-5 decibels to the overall per bus. Thus on hot days we often have 3-5 diesel buses accelerating at once with their air conditioning running for decibel readings well over 100! Thus, we experience nearly 900 BBB diesel engine accelerating daily, often at the same time. This does not include the hundreds of stops and starts of MTA. No one reading this would accept such an invasion to their senses. Osha monitoring starts at over 90db (Ref. #5) Where in the draft EIR is this accounted for?

19-21

We have a right to peace in our homes and in our gardens/yards. This is afforded to us as R1 homeowners by LA

19-22

Municipal Code. (Ref. #1) The ambient noise maximum levels are 50 dB/day 40db/night. Due to the logarithmic nature of decibel measurements, minimal decibel increases result in significant increases in actual noise. Also, stopping and starting noise is more of a nuisance than steady noise.

19-22

The irony of this is, UCLA has a program in place to help other neighborhoods ("less fortunate") measure decibel levels and seek justice. (Ref. #6) Yet, UCLA violates noise standards regularly and is a monstrous bureaucracy to deal with.

19-23

I also note that Lot 32 has been proposed as the alternate site. It is my understanding that this is the location originally proposed for the buses, but due to the inability of the bus companies and UCLA to work together this has not happened. We must insist that UCLA and the public transportation agencies work together to solve problems and keep Lot 32 as an option. The Northwest location is the best to bring in the already forecasted demand by current students.

19-24

This brings up another issue. Why does BBB send so many empty buses? If UCLA ridership is stable and the neighborhood population is stable, why are increases justified? Who is monitoring how many BBB pull into the terminal? Does UCLA give them permission? Who are the mysterious "community" who requested these buses who do not ride them? Are these buses subsidized by the state (who cannot afford such waste)?

19-25

This past year, UCLA offer to take the early morning (before 7am) buses into Ackerman turnaround. MTA and Culver City agreed and those buses have been moved. Recently, we have been approached by UCLA management who inform us orally that they are trying to get BBB to move their before 7am and after 11pm buses into campus via Westholme. We applaud this effort and wait for confirmation by BBB and UCLA in writing for this second step in mitigation.

19-26

I believe that there are issues that UCLA is not addressing that would not only benefit local residents but benefit UCLA, the local area and state taxpayers. Currently UCLA is served by a bus system that operates independently of UCLA, yet staging buses on UCLA property. The outdated main terminal is located next to a R1 neighborhood and was put in place in the 1930's. There is NO handicap access and is, in fact, treacherous location with many locations. UCLA ridership of buses has not increased yet with the incentive to ride free.

19-27

Reference #1) LA City Noise Ordinance

<http://www.nonoise.org/lawlib/cities/losangel.htm>

Reference #2) Noise facts from various Canadian Gov't entities

(with comparative vehicular decibel levels including 90 db documentation of accelerating diesel buses)

http://www.geocities.com/trolley_coalition/noise.html

Reference #3) Additive decibel factors of multiple noise sources

http://physics.mtsu.edu/~wmr/log_4.htm

Reference #4) Bus testing and research center, Altoona, PA 10% increase in decibel levels with air conditioning running

<http://uwadmweb.uwyo.edu/President/campusparkingandtransportationaug2001.htm>

Reference # 5) http://www.hearnet.com/at_risk/risk_trivia.shtml

Reference # 6) UCLA assisting other neighborhoods with their noise/air pollution problems.

http://www.usc.edu/schools/medicine/academic_departments/preventive_med/occ_environmental/scehsc/press%20stories/boylehtsCOEH.pdf

Sincerely,

Toni Gray

Response to Comment Letter 19

Letter from Toni Gray, dated December 20, 2002

Response to Comment 19-1

Comment noted. The corrected copy of Ms. Gray's letter has been included in the 2002 LRDP Final EIR.

Response to Comment 19-2

This comment, which provides introductory information, is acknowledged. Refer to the responses to comments for Letters 20 (Nora Rozengurt), 21 (Paul Verdon), and T (Transcript of November 20, 2002, Hearing) for discussion regarding the environmental issues raised by those comments.

Response to Comment 19-3

This comment is acknowledged. The University considers this EIR to be in compliance with Section 15140 of the *CEQA Guidelines*, which requires that EIRs be written in plain language, with use of appropriate graphics. The University has made every effort to be clear, and the comment does not provide an example of instances in which the EIR is unclear.

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of the allocation of growth throughout the University of California system. Refer to Responses to Comments 19-4 to 19-27 regarding specific comments.

Response to Comment 19-4

Student forecast projections are made by the Budget Office of the University of California Office of the President and are based upon the best available data. As new data becomes available, the student forecast projections are updated. The comment does not provide any alternative data or forecasting methodologies to demonstrate that the State or the University of California has miscalculated its student forecasts. Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of the process to determine additional enrollment at each of the University of California campuses. Further, refer to Response to Comment 12-21 for a discussion of the incentives to reduce time-to-degree. With respect to the other comments raised by the comment, in accordance with CEQA, the purpose of the 2002 LRDP EIR is to evaluate the significance of physical changes in the environment resulting from approval of the 2002 LRDP. See, for example, *CEQA Guidelines* Section 15064(d); see also *CEQA Guidelines* Section 15358(b) (impacts analyzed in an EIR must be "related to a physical change" in the environment). Because the remainder of the comment does not address a physical change in the environment that could result from approval of the 2002 LRDP, it does not relate to the

subject matter of the 2002 LRDP Draft EIR and thus no response is required. See *CEQA Guidelines* Section 15088 (lead agency shall prepare responses to comments on “environmental issues”).

Refer also to Response to Comment 12-2 for the fall 2002 headcount enrollment of domestic graduate and undergraduate students and Response to Comment 12-13 for the fall 2002 headcount enrollment of foreign undergraduate and graduate students. Full-time-equivalent enrollment is not calculated or aggregated according to foreign/domestic status, and is not available.

Response to Comment 19-5

The use of consultants by the campus is allowed by Section 15084(d)(2) of the *CEQA Guidelines*, which states that the arrangements by Lead Agency for preparing a draft EIR include “contracting with another entity, public or private.” Pursuant to CEQA, the purpose of the 2002 LRDP EIR is to evaluate the significance of physical changes in the environment resulting from approval of the 2002 LRDP. See, for example, *CEQA Guidelines* Section 15064(d). See also *CEQA Guidelines* Section 15358(b) (impacts analyzed in an EIR must be “related to a physical change” in the environment). Because this comment does not address a physical change in the environment that could result from implementation of the 2002 LRDP, it does not relate to the subject matter of the 2002 LRDP Draft EIR and thus no response is required. See *CEQA Guidelines* Section 15088 (lead agency shall prepare responses to comments on “environmental issues”). Regarding the need to accommodate additional students with additional campuses, refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of systemwide accommodation of increased enrollment.

Response to Comment 19-6

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of enrollment growth at UCLA and throughout the University of California system, including the University of California, Merced. The University of California in Merced, which is the new tenth campus of the University of California, has been designed to accommodate a portion of the enrollment growth expected in the State.

Response to Comment 19-7

Refer to Topical Response C (Allocation of Enrollment Growth to the UCLA Campus) for a discussion of enrollment growth at UCLA and throughout the University of California system, including the University of California, Merced. The University of California in Merced, which is the new tenth campus of the University of California, has been designed to accommodate a portion of the enrollment growth expected in the State.

Response to Comment 19-8

Refer to Response to Comment 12-39 for a discussion of the relationship between full-time equivalent students and headcount students. In addition, an Environmental Impact Report was prepared in accordance with Section 15063(b)(1)(A) of the *CEQA Guidelines* because the project could result in a significant effect on the environment, either individually or cumulatively.

One component of the 2002 LRDP is the NHIP, which provides for 2,000 additional bed spaces in the Northwest zone of campus for undergraduate students to respond to the anticipated increase in student enrollment while meeting the student housing goals articulated in the 2001 Student Housing Master Plan. UCLA continues to reduce the need for on-campus parking and the associated generation of vehicle trips through the implementation of a Transportation Demand Management (TDM) program that includes, but is not limited to, provision of on-campus housing (e.g., NHIP), van pools, ride-sharing incentives, shuttles, and other transportation modes and incentives. The TDM program is highly effective in reducing reliance upon the automobile and even exceeds the goals of the South Coast Air Quality Management District for Average Vehicle Ridership.

Further, the 2002 LRDP Draft EIR described the full range of potential environmental impacts that could result from the projected increase in student enrollment, including traffic-related impacts from the new students and visitors to campus. As noted in the 2002 LRDP Draft EIR (Volume 1, page 2-5):

While the campus has evaluated a range of potential mitigation measures to reduce significant project impacts, and will implement all feasible mitigation measures, construction and operation of the 2002 LRDP would result in the following significant and unavoidable impacts:

Air Quality

- Construction impacts resulting from peak daily emissions of NO_x
- Operational impacts resulting from peak daily emissions of CO, VOC, and NO_x during the twelve-week summer session

Noise

- Construction impacts resulting from groundborne vibration or groundborne noise levels
- Construction impacts resulting from an increase in on-campus ambient noise levels
- Construction impacts resulting from an increase in off-campus ambient noise levels

Traffic and Circulation

- Operational impacts resulting from an exceedance of the applicable LOS criteria for vehicle trips during the regular session at four intersections during the A.M. peak hour
- Operational impacts resulting from an exceedance of the applicable LOS criteria for vehicle trips during the twelve-week summer session at twelve intersections (two in the A.M. peak hour, three in P.M. peak hour, and seven in both the A.M. and P.M. peak hours)
- Construction impacts resulting from truck trips

Concurrent with the 2002 LRDP, the campus also proposed the Northwest Housing Infill Project, which would construct approximately 2,000 beds of undergraduate housing on-campus. The project-specific environmental effects of the NHIP are analyzed in Volume 2 of the 2002 LRDP Draft EIR.

Response to Comment 19-9

Noise measurement location 3 identified in Figure 4.9-3 (Noise Measurement Locations) of the 2002 LRDP Draft EIR (Volume 1, page 4.9-7) was located at the northeast corner of Hilgard Avenue and Comstock Avenue, approximately 43 feet from the edge of Hilgard (similar to the setback distance of the single-family residence at this corner). As discussed in the 2002 LRDP Draft EIR (Volume 1, page 4.9-5), the existing ambient daytime noise levels were measured using a Larson-Davis Model 720 precision sound level meter, which satisfies the American National Standards Institute (ANSI) for general environmental noise measurement instrumentation. The noise levels at location 3 were measured from 9:30 A.M. until 9:45 A.M. on October 24, 2001. The average, minimum, and maximum noise levels measured at this location are identified in Table 4.9-2 (Existing Daytime Noise Levels at Selected On- and Off-Campus Locations) (Volume 1, page 4.9-8).

This location was selected to identify existing noise levels that occur in the residential area located along Hilgard Avenue between Sunset Boulevard and Wyton Drive, and is roughly the same location as noise monitoring location in the 1990 LRDP EIR. It was not selected to identify or evaluate existing or future noise levels associated with the Hilgard Bus Terminal. This is because no changes in operations associated with the Hilgard Bus Terminal are proposed or expected to occur in association with the 2002 LRDP. Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

The 2002 LRDP Draft EIR (Volume 1, pages 4.9-29 to 4.9-35) evaluates the changes in roadway noise levels that would occur along Hilgard Avenue between Sunset Boulevard and Wyton Drive. This was done using the FHWA Highway Noise Prediction Model modified with Caltrans vehicle noise rates, and traffic volumes from the UCLA Long Range Development Plan Transportation Systems Analysis. The calculation data and results are provided in Appendix 8 of the 2002 LRDP Draft EIR. This is the method used by most agencies to assess potential noise impacts associated with roadway traffic volumes.

As shown in Table 4.9-12 (Roadway Noise Impacts—Regular Session) of the 2002 LRDP Draft EIR (Volume 1, pages 4.9-29 to 4.9-31), there would be no measurable change in noise level along this roadway segment during the regular session with the implementation of the 2002 LRDP. Table 4.9-13 (Roadway Noise Impacts—Summer Session) of the 2002 LRDP Draft EIR (Volume 1, pages 4.9-33 to 4.9-34) indicates that noise levels along this roadway segment would increase by 0.3 dBA CNEL during

the summer session. These changes would not exceed the thresholds of significance utilized in the 2002 LRDP Draft EIR (Volume 1, page 4.9-21). Therefore, no mitigation is required for this potential impact of LRDP implementation.

Response to Comment 19-10

The Los Angeles Municipal Code does not establish limits on vehicle noise, as suggested by the comment. Section 111.00 of the Los Angeles Municipal Code (Chapter XI, Noise Regulation) regulates specific sources of noise that occur throughout the city and are subject to the City's police powers. However, the Municipal Code specifically excludes from regulation all motor vehicles that are operated upon any public highway, street, or right-of-way. Please refer to Section 114.02(b) of the Los Angeles Municipal Code. This is because the noise levels that individual motor vehicle classes can generate are regulated by the State Vehicle Code. In addition, UCLA is a State entity and, as such, does not have any role in the enforcement of the City's Municipal Code.

Existing ambient noise levels at the homes located along Hilgard Avenue are primarily caused by motor vehicles. These vehicles, including the buses utilizing the Hilgard Bus Terminal are operating on public streets. Therefore, the noise levels generated by these vehicles are not subject to regulation under the Los Angeles Municipal Code. The 2002 LRDP Draft EIR does not evaluate existing or future noise conditions associated with the Hilgard Bus Terminal because no changes in operations associated with the Hilgard Bus Terminal are proposed or expected to occur in association with the 2002 LRDP. Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Consistent with CEQA requirements, the purpose of the 2002 LRDP Draft EIR is to analyze the impacts associated with physical changes in the environment resulting from approval of the 2002 LRDP by The Regents. See *CEQA Guidelines* Section 15002(a) ("basic purpose of CEQA is to inform governmental decision makers and the public about the potential significant environmental effects of *proposed* activities" [emphasis added]). CEQA does not require EIRs to analyze the environmental effects of previously approved or existing activities that are not proposed to be changed as a result of the project under consideration. See, for example, *Black Property Owners Association v. City of Berkeley*, 22 Cal. App. 4th 974 (1994) (requiring an EIR to analyze effects of existing conditions (as distinct from project-related changes) would not further the purpose of CEQA to inform the public and responsible officials of the environmental consequences of their decisions before those decisions are made). Therefore, no mitigation is required in conjunction with 2002 LRDP implementation to address existing noise levels at the homes located along Hilgard Avenue.

Response to Comment 19-11

Without additional information, it is not possible to verify the peak noise levels identified in this comment. However, the existing 24-hour noise level of 66.3 dBA CNEL identified in Table 4.9-5 (Existing Roadway Noise Levels Off Campus—Regular Session) (Volume 1, pages 4.9-11 to 4.9-12) for the segment of Hilgard Avenue between Wyton Drive and Westholme Avenue during the regular session is representative of the average roadway noise level along the entire roadway segment. The 2002 LRDP Draft EIR does not evaluate existing or future noise levels associated with specific activities occurring in the immediate vicinity of the Hilgard Bus Terminal. This is because no changes in operations associated with the Hilgard Bus Terminal are proposed or expected to occur in association with the 2002 LRDP. Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 19-12

Noise levels in decibels are not combined by simple addition. Instead, they are combined logarithmically based on short- and long-term sound events that occur over a period of time. (See Section 4.9.1 [Environmental Setting] of the 2002 LRDP Draft EIR [Volume 1, pages 4.9-1 to 4.9-5] regarding the fundamentals of sound.) The existing noise level of 66.3 dBA CNEL identified in Table 4.9-5 (Existing Roadway Noise Levels Off Campus—Regular Session) (Volume 1, pages 4.9-11 to 4.9-12) for the segment of Hilgard Avenue between Wyton Drive and Westholme Avenue during the regular session is based on 14,600 total vehicles occurring over a 24-hour period. Therefore, the analysis addresses the logarithmic effect of multiple vehicles, including buses, operating throughout the day. The 2002 LRDP Draft EIR does not evaluate existing or future noise levels associated with specific activities occurring in the immediate vicinity of the Hilgard Bus Terminal because no changes in operations associated with the Hilgard Bus Terminal are proposed or expected to occur in association with the 2002 LRDP. Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 19-13

It is accepted that noise levels associated with buses are slightly greater when air conditioning units are operating. Because the 2002 LRDP Draft EIR uses vehicle noise emission rates developed by Caltrans, it is assumed that the buses would have operational air conditioners or air circulation systems as is common throughout the state. Therefore, the noise levels associated with air conditioning units on buses have been factored into the EIR analysis.

Response to Comment 19-14

The properties located along the eastern side of Hilgard Avenue between Wyton Drive and Westholme Avenue are zoned R1 (One-Family Zone) and R4 (Multiple Dwelling Zone). The R4 properties are located between Westholme Avenue and Dalehurst Avenue and are developed with sorority houses.

In response to this comment, Table 4.9-5 (Existing Roadway Noise Levels Off Campus—Regular Session) (Volume 1, pages 4.9-11 to 4.9-12) has been revised as follows:

Hilgard Avenue, Wyton Drive to Westholme Avenue	Single- and Multi-Family	63.6
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Likewise, Table 4.9-6 (Existing Roadway Noise Levels Off Campus—Summer Session) (Volume 1, pages 4.9-12 to 4.9-14) has been revised as follows:

Hilgard Avenue, Wyton Drive to Westholme Avenue	Single- and Multi-Family	63.4
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Response to Comment 19-15

Based upon information provided by transit operators, the 2002 LRDP Draft EIR (Volume 1, pages 4.13-13 and 4.13-15, Tables 4.13-3 and 4.13-4) indicated that adequate bus capacity existed on those lines serving the campus (for which data was available). The provision of additional housing in the Northwest zone could reduce demand for public transit, as fewer students would have to commute to campus. As noted in the 2002 LRDP Draft EIR (Volume 1, page 4.13-96):

...compared to current conditions, the total number of other commuters is anticipated to decline (as shown in Table 4.13-30) by approximately 954 persons during the regular session (compared to current conditions) due in part to the proposed NHIP. Thus, because the number of "other commuters" would be slightly less than current conditions, utilization of alternative transportation modes would also decrease, and campus-related demand for public transit would also decline slightly.

Response to Comment 19-16

The traffic analysis in the 2002 LRDP Draft EIR did account for vehicle trips from on-campus residential students. As shown in Table 4.13-23 (Volume 1, page 4.13-40), with implementation of the 2002 LRDP, undergraduate students that reside on campus are projected to generate 1,678 vehicle trips per day and graduate students that reside on campus are projected to generate 1,917 vehicle trips per day.

Response to Comment 19-17

By transferring to the MTA line 576, which travels along Wilshire Boulevard, Le Conte Avenue, Hilgard Avenue, and Sunset Boulevard and then north on Sepulveda, transit riders from Santa Monica or Culver City can travel north of the Hilgard Bus Terminal, and may travel into the San Fernando Valley.

Response to Comment 19-18

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal. Refer also to pages 4.13-13 through 4.13-16 of the 2002 LRDP Draft EIR, as well as Table 4.13-3 (Current Estimated Bus Capacity [SMMBL and Culver City Lines Serving UCLA]) and Table 4.13-4 (Current Estimated Bus Capacity [MTA Lines Serving Westwood]) for a discussion of the current estimated bus capacity for the Santa Monica Blue Bus and Culver City Bus lines. In summary, while some of the bus lines are above their seating capacity during the peak periods, standing room remains available on all routes and current total capacity is generally sufficient to meet demand. Further, as stated in Impact LRDP 4.13-14 of the 2002 LRDP Draft EIR, implementation of the 2002 LRDP would decrease the demand for public transit slightly, which would ensure that no changes in bus service would be required as a result of the proposed project.

Response to Comment 19-19

Refer to Response to Comment 19-18 for a discussion of the existing and anticipated capacity of buses serving UCLA. Further, as discussed in Topical Response B (Hilgard Bus Terminal) and in the 2002 LRDP Draft EIR (Volume 1, page 4.13-16), UCLA does not own or operate the buses utilizing the HBT, and does not control bus schedules or the level of bus operations.

Response to Comment 19-20

The 2002 LRDP Draft EIR does not evaluate existing or future noise levels associated with specific activities occurring in the immediate vicinity of the Hilgard Bus Terminal because no changes in operations associated with the Hilgard Bus Terminal are proposed or expected to occur in association with the 2002 LRDP. Please refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 19-21

The 2002 LRDP Draft EIR does not evaluate existing or future noise levels associated specifically with the Hilgard Bus Terminal because no changes in operations associated with the Hilgard Bus Terminal are proposed or expected to occur in association with the 2002 LRDP. Please refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal. The noise standards evaluated by the US Occupational Safety & Health Administration (OSHA) apply to workplaces only. They do not apply to ambient noise levels in community environments.

Response to Comment 19-22

Please see Response to Comment 19-10 regarding existing ambient noise levels and their applicability to Los Angeles Municipal Code noise regulations. The 2002 LRDP Draft EIR does not evaluate existing or

future noise levels associated specifically with the Hilgard Bus Terminal because no changes in operations associated with the Hilgard Bus Terminal are proposed or expected to occur in association with the 2002 LRDP. Please refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 19-23

The University does not have a program in place to help other “less fortunate” neighborhoods measure noise levels and seek “environmental justice.” The agency referred to in this comment is the Southern California Environmental Health Sciences Center (SCEHSC), which was established through funding from the National Institute of Environmental Health Sciences. It is staffed by researchers and professionals from USC and UCLA. It is not, however a department within UCLA. The SCEHSC provided educational assistance to the “Boyle Heights Mejoramiento” (Making Boyle Heights Better) in evaluating noise monitoring data collected by the Los Angeles Unified School District. It did not conduct any noise monitoring or research and has not assisted the group in seeking “environmental justice.”

Please see Response to Comment 19-10 regarding existing ambient noise levels and their applicability to Los Angeles Municipal Code noise regulations. The existing ambient noise levels at the homes located along Hilgard Avenue are primarily caused by motor vehicles, which are exempt from the noise standards of the Los Angeles Municipal Code. Therefore, the ambient noise levels generated by roadway traffic, including buses, do not violate City standards.

Response to Comment 19-24

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of alternative locations for buses that currently utilize the Hilgard Bus Terminal.

Response to Comment 19-25

Refer to Response to Comment 19-18 for a discussion of the existing and anticipated capacity of buses serving UCLA. Further, as discussed in Topical Response B (Hilgard Bus Terminal) and in the 2002 LRDP Draft EIR (Volume 1, page 4.13-16), UCLA does not own or operate the buses utilizing the HBT, and does not control bus schedules or the level of bus operations.

Response to Comment 19-26

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 19-27

This comment is acknowledged.

An accessible travel path for disabled transit riders is available at Hilgard Avenue and Westholme Avenue, one stop south of the Hilgard Avenue Bus Terminal.

December 18th, 2002

Tova Lelah
Assistant Director
UCLA Capital Programs
Attn: Environmental Planning
1060 Veteran Ave.
Los Angeles, CA 90095-1365

Dear Mrs Lelah

I own a property on 10530 Strathmore Dr., 6 houses down from the Bus Terminal at the Hilgard/Strathmore junction . I am writing to add my comments on the Draft Environmental Report for the Northwest Housing Infill Project.

I have read your EI Draft Report and wish to comment on a number of issues, all of them related to the environmental impact that further developments at UCLA will have on traffic, in particular bus traffic, around campus.

1. This report concludes that the Northwest Housing Infill Project will not result in a need to increase the number of bus lines or bus rides around campus.

- Over the last 5 years there has been an increase o 14% (week days), 76% (Saturdays) and 122% (Sundays) in bus rides stopping and starting at the Strathmore/ Hilgard bus station. This increase has not come in response of a population increase in the neighborhood, which has remained constant since the single family homes were built in the 1940's and 1950's.
- We are assured by the Assistant Vicechancellor, Mr. S. Morabito that this increase has not occurred in response to an increase in the number of students or campus activity. In fact, we are told that the BruinGo initiative, designed to encourage UCLA students and staff to use public transport has not been successful in its aim.
- We have thus to conclude that the reason why the new 4,000 students (which this project aims to house), will not need further bus rides is that **the increase in services is already in place**. It has been implemented, without consultation with the homeowners or their representatives. It was done over the last 5 years and has

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resulted in a massive overcapacity which is wasteful in addition to severely damaging for the life of UCLA neighbors.

2. The "cordon count" carried out every year as the only measurement of the campus-related traffic in the vicinity of UCLA.

- The cordon count is the golden parameter on which UCLA is priced for keeping campus trip generation below the cap of 139,000 daily trips.
- This cordon count, however, does not take into account any vehicles not entering campus. Therefore, it does not count the massive increase in bus rides reaching and leaving the Hilgard/ Strathmore bus station, increase that, in the words of bus company officials, have been developed as a "service to UCLA".
- During the course of multiple meetings and correspondence exchange with the three bus companies operating at this station, we permanently hear officials from all 3 companies talk of their service to UCLA as their principal client at this site and the prime reason for their ever increasing number of bus rides at this station.
- Thus, residents around the campus are suffering a massive disruption to their lives because of noise and pollution of buses which keep increasing in number in order to serve UCLA needs. However, since the buses don't enter campus at all, this traffic increase is not counted as UCLA-generated traffic.

3. The consequences of the increase in bus rides over the last 5 years

- The increase in bus rides over the last 5 years has resulted in a profound deterioration of the quality of life of the families who own properties in the vicinity of the bus station. The specific bus activities that are causing severe shortage of sleep and stress to homeowners are:
 - i. Traffic disruption which has turned the pedestrian crossing into an extremely dangerous spot, because of buses stopping at the center of Hilgard Ave awaiting for a gap in the traffic, to make a u-turn into the bus station.
 - ii. Permanent noise due to raving of engines as buses accelerate to make the u-turn as fast as possible.
 - iii. Permanent back-up intermittent beeping as buses have to move back and forth to accommodate into the small space within the station where there are usually anything between 3 to 10 buses already parked waiting for the time of the start of their rides.

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- iv. Idling of engines. Notwithstanding that idling is illegal, bus drivers daily leave the bus engines running for long periods of time whilst they use the restrooms or walk into the campus to the vending machines at Murphy Hall. Intolerable levels of noise and diesel fumes are the direct consequence of these infractions. Moreover these offences are often perpetuated at 5.30 to 7 am which wakes up every family on our street. Neighbors have repeatedly reported the offences to the bus company without effective measures been taken to enforce the law and induce the drivers to discontinue this practice.
- v. Vibration levels. In the R1 zone adjacent to the Hilgard/ Strathmore bus station we experience severe vibration throughout the day caused by the continuous movement and acceleration of heavy buses in and out of the station.
- vi. Accidents. Neighbors have observed and reported numerous accidents caused by buses maneuvering and carrying out unsuccessful U-turns in the vicinity of the Strathmore bus station.

20-9

Neighbors to the Hilgard/ Strathmore bus station are suffering this aggressive (and totally unnecessary) expansion of the use of this station. Buses idling, backing, raving their engines, racing along the road, seven days a week, throughout the day and night, from 5.30 am until 1 am. A more than double expansion of the Sunday bus numbers. We see most buses reaching the terminal empty and leaving it empty. And we can not get enough sleep. Our houses vibrate day and night with the roaring of the engines. Some of us have paid thousands of dollars to double-glaze their windows. The noise from the bus station still wakes us up at 5.30 in spite of that.

20-10

4. Off campus measurements of noise, vibration and air contamination.

- The draft EIR report contains numerous tables. Levels of air CO contamination, decibel readings, soil vibration measurements. Measurements have been done inside and outside campus.
- None of these measurements have been done at the site where most noise and air contamination do occur, which is at the Hilgard/ Strathmore bus station which is immediately adjacent to an R1 zone.
- The draft EIR states (Vol. 1, page 4.9-3) that noise above 45 decibels at night disrupt sleep and more than 85 decibels can cause temporary or permanent hearing loss. Neighbors of the Hilgard Strathmore bus station have measured noise levels. The values that we have obtained are of 85 and 90 decibels at the front of our houses at day time, and of 50 to 60 intermittently between 10 and 12 P.M. and 5.30 to 7 A.M. These levels are far beyond the safety levels as displayed in the draft EIR.

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20-12

5. The response in the EIR (vol. 1, page 4.2-8) to mine and other neighbors complains about the noise and air pollution derived from the Hilgard/ Strathmore bus station.

- In Volume 1, page 4.2-8 the draft EIR states that the campus does not own the bus companies and has not the power to change bus schedules. UCLA neighbors can not accept this argument since the land on the site of the bus station belongs to UCLA. As landowners, UCLA authorities can, if they wish to, apply pressure to the bus companies.
- Certainly, UCLA should not carry on expanding or placing further traffic (private or public) noise and pollution upon its neighbors unless it finds the way to keep the consequences of this expansion within its (vast) campus.

20-13

6. What the homeowners on Hilgard/ Strathmore want.

- The number of bus rides using the terminal were increased massively over the last 5 years. This increase was done without consultation to the people most affected by them, that is homeowners in the vicinity of the station. Moreover, according to UCLA this increase was not done in response to any increase in student or staff numbers. Nor was it in response to an increase in the local population which has remained stable for over 40 years.
- What the neighbors in Strathmore Drive want is to see the number of buses using the station **reduced back to those 5 years ago**. The number of buses using the station should bear proportion to the ridership and also be compatible with the right of the homeowners on this R1 zone to the peaceful enjoyment of our homes.
- Alternatively, if these apparently unnecessary excess buses are found to be in fact necessary for UCLA to continue to work and grow, then the Hilgard/Strathmore bus terminal **should be found a new home WITHIN CAMPUS**. This is the only fair solution to UCLA needs of expansion.
- **Ground vibration: Vol. 1, page 4.9-4.** According to the draft EIR a great proportion of ground vibration is caused by heavy vehicles trafficking along rough surfaced roads. Vibration of our homes is one of the most upsetting consequences of the activity at the Hilgard/ Strathmore bus station. Especially at early hours of the morning and late at night. Excess vibration over time can also damage our properties. If a change of the surface of Hilgard road can reduce this vibration, UCLA ought to ensure that such change is implemented as soon as possible.

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I request that a serious initiative is taken to relocating all UCLA buses to another site, and keep it out of residential neighborhoods. UCLA has offered in the past and again recently the use of LOT 32, a part of Campus, as an alternative bus station. This location is ideal since it is not a residential area and is also closer to the projected new developments.

20-18

I also wish to request to be continue to include me in your list of concerned homeowners, and keep me informed of the progress of my suggestions and those of my neighbors throughout the process of this development.

20-19

Thank you very much for your attention

Sincerely yours,



Nora Rozengurt
10530 Strathmore Drive
Los Angeles, Ca 90024
(310) 470-3698
nrozengurt@mednet.ucla.edu

Response to Comment Letter 20

Letter from Nora Rozengurt, dated December 18, 2002

Response to Comment 20-1

This comment contains introductory information, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. Therefore, no response is required.

Response to Comment 20-2

Comment noted. This comment accurately restates a conclusion reached in the Volume 2 of the 2002 LRDP Draft EIR.

Response to Comment 20-3

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 20-4

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal and Topical Response A (BruinGo Program) for a discussion of the BruinGo Program.

Response to Comment 20-5

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal. The 2002 LRDP and 2002 LRDP Draft EIR did not propose, or analyze, an increase of 4,000 additional housing units. As discussed throughout the 2002 LRDP Draft EIR, concurrent with the 2002 LRDP, the University has proposed the Northwest Housing Infill Project (NHIP), which would construct approximately 2,000 beds of undergraduate student housing, of which approximately 1,675 would accommodate new students. As further discussed in the 2002 LRDP Draft EIR (see discussion of Impact LRDP 4.13-14 and Impact LRDP 4.13-15 in Volume 1, pages 4.13-93 to 4.13-96), the 2002 LRDP (including the NHIP component) will not result in the need for additional public transit service.

Response to Comment 20-6

The comment is incorrect in stating that the annual cordon count is the only measurement of the campus-related traffic in the vicinity of UCLA. The 2002 LRDP Draft EIR provided a discussion of existing conditions, which identified traffic conditions at 58 study intersections. Previous EIRs prepared for UCLA projects have provided similar information. Each year, the campus produces a Mitigation Monitoring Report, which provides the on-campus parking inventory in relation to the parking cap of 25,169 parking spaces. Each spring, the campus also submits an annual Transportation Survey, which

identifies the Average Vehicle Ridership (a measure of vehicle occupancy) achieved by UCLA commuters for that year. As noted in the 2002 LRDP Draft EIR (Volume 1, page 4.13-17):

In addition, since 1990, when the SCAQMD first required a survey of all employees to determine Average Vehicle Ridership⁵ (AVR), the TDM program increased the campuswide AVR from 1.26 to 1.51 by spring 2000, exceeding the goal of 1.5 set by the SCAQMD.

Thus, in addition to the annual cordon count, the campus uses a range of measures to determine parking supply, traffic conditions, and average vehicle ridership.

The 2002 LRDP Draft EIR reaffirmed the campus commitment to continue these efforts during the planning horizon of the 2002 LRDP: PP 4.13-1(a) commits the campus to maintain the vehicle trip cap of 139,500 average daily trips; PP 4.13-1(b) maintains the on-campus parking cap at 25,169 spaces; PP 4.13-1(c) continues expansion on on-campus housing; and PP 4.13-1(d) commits the campus to continued implementation of the TDM program and to meet the AVR targets established by the SCAQMD.

As discussed in the 2002 LRDP Draft EIR (Volume 1, page 4.13-23):

In accordance with the terms of the TMMA, the campus and the Los Angeles Department of Transportation conduct a weeklong "Cordon Count" each year during the third week of the Fall Quarter (when regular session enrollment is highest) to estimate the total number of campus-related vehicle trips by counting the number of vehicles that enter and exit the campus at all campus entrances.

The comment is correct that the cordon count does not count vehicles that do not enter the campus, and therefore public transit agency buses that traverse the campus perimeter are not included in the count. However, it should also be noted that any vehicle that enters or exits the campus, including cars using campus streets as a route to traverse the Westwood area, are counted, even though those trips are not campus-related. In addition, existing traffic counts used in the traffic analysis in the 2002 LRDP Draft EIR did account for transit vehicle traffic at all of the 58 study intersection.

The University acknowledges that public transit operators provide a service, however, the service is provided to bus patrons, many of whom are faculty, staff, and students. The University may derive benefits from this service, including reduced parking demand. Decisions to modify bus service are the responsibility of public transit operators.

Refer also to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 20-7

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

⁵ The AVR is the ratio of employees arriving between 6 A.M. and 10 A.M. to the motor vehicles they drive to campus.

Response to Comment 20-8

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 20-9

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal. It should be noted that Hilgard Avenue is a public thoroughfare under the jurisdiction of the City of Los Angeles Department of Transportation, which has the authority and responsibility of establishing speed limits, turn limitations, and lane delineations. As discussed in Topical Response B, the University has worked successfully with the community and the bus companies to address concerns stemming from bus traffic and use of the Hilgard Bus Terminal. For example, UCLA has communicated with the bus companies to indicate that they must discontinue lengthy idling of their engines. Refer also to Response to Comment 19-9 for a discussion of the noise measurements taken in the vicinity of the Hilgard Bus Terminal.

Response to Comment 20-10

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal. As noted in this Topical Response and in the 2002 LRDP Draft EIR (Volume 1, page 4.13-16), UCLA does not own or operate the buses that are routed to campus destinations, and does not control bus schedules or the level of bus operations. As discussed in Topical Response B, the University has worked successfully with the community and the bus companies to address concerns stemming from bus traffic and use of the Hilgard Bus Terminal. For example, UCLA has communicated with the bus companies to indicate that they must discontinue lengthy idling of their engines. Refer also to Response to Comment 19-9 for a discussion of the noise measurements taken in the vicinity of the Hilgard Bus Terminal.

Response to Comment 20-11

The 2002 LRDP Draft EIR does not evaluate existing air quality and noise conditions associated specifically with the Hilgard Bus Terminal. This is because no changes in operations associated with the Hilgard Bus Terminal are proposed or expected to occur in association with the 2002 LRDP. Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal. As shown in Figure 4.9-3 (Noise Measurement Locations) of the 2002 LRDP Draft EIR (Volume 1, page 4.9-7), existing ambient daytime noise levels were monitored at the intersection of Hilgard Avenue and Strathmore Avenue (Location 4). The noise levels (both average and maximum levels) monitored at this location and identified in Table 4.9-2 (Existing Daytime Noise Levels at Selected On- and Off-Campus Locations) of the 2002 LRDP Draft EIR (Volume 1, page 4.9-8) were found to be lower than a number of other locations monitored in the vicinity of the campus. As shown in Table 4.2-8 (Future With

Project Localized Carbon Monoxide Concentrations—Regular Session) of the 2002 LRDP Draft EIR (Volume 1, pages 4.2-37 to 4.2-38), CO levels are highest at intersections with the greatest volume of vehicle traffic, and the intersections with the highest existing levels of CO are the intersections of Wilshire Boulevard and San Vicente Boulevard, and Wilshire Boulevard and Sepulveda Boulevard.

Response to Comment 20-12

The 2002 LRDP Draft EIR does not evaluate existing or future noise levels associated specifically with the Hilgard Bus Terminal because no changes in operations associated with the Hilgard Bus Terminal are proposed or expected to occur in association with the 2002 LRDP. Please refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 20-13

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal. As discussed in Topical Response B, the University has worked successfully with the community and the bus companies to address concerns stemming from bus traffic and use of the Hilgard Bus Terminal. Refer also to Response to Comment 19-9 for a discussion of the noise measurements taken in the vicinity of the Hilgard Bus Terminal.

Response to Comment 20-14

See Response to Comment 20-5 and Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal. As noted in this Topical Response and on page 4.13-16 of the 2002 LRDP Draft EIR, UCLA does not own or operate the buses that are routed to campus destinations, and does not control bus schedules or the level of bus operations.

Response to Comment 20-15

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal, where UCLA's successful efforts to reduce bus volume at the Hilgard Bus Terminal to pre-1990 levels are described.

Response to Comment 20-16

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 20-17

As discussed in the 2002 LRDP Draft EIR (Volume 1, page 4.9-18), heavy trucks generally generate groundborne vibration velocity levels of around 63 VdB and levels could reach 72 VdB where trucks pass over bumps in the road. Similar groundborne vibration velocity levels would occur with heavy buses.

As discussed in the 2002 LRDP Draft EIR (Volume 1, page 4.9-4), 100 VdB is the threshold where minor damage can occur to fragile buildings. Therefore, existing groundborne vibration velocity levels associated with heavy vehicles would not be expected to cause any damage at the existing homes along Hilgard Avenue, although it is acknowledged that such vibration may be perceptible.

Consistent with CEQA requirements, the purpose of the 2002 LRDP Draft EIR is to analyze the impacts associated with physical changes in the environment resulting from approval of the 2002 LRDP by The Regents. See *CEQA Guidelines* Section 15002(a) (“basic purpose of CEQA is to inform governmental decision makers and the public about the potential significant environmental effects of *proposed* activities” [emphasis added]). CEQA does not require EIRs to analyze the environmental effects of previously approved or existing activities that are not proposed to be changed as a result of the project under consideration. See, for example, *Black Property Owners Association v. City of Berkeley*, 22 Cal. App. 4th 974 (1994) (requiring an EIR to analyze effects of existing conditions (as distinct from project-related changes) would not further the purpose of CEQA to inform the public and responsible officials of the environmental consequences of their decisions before those decisions are made). Therefore, no mitigation is required in conjunction with 2002 LRDP implementation to address existing noise and groundborne vibration velocity levels at the homes located along Hilgard Avenue.

The 2002 LRDP Draft EIR does not evaluate future groundborne vibration velocity levels associated specifically with the Hilgard Bus Terminal because no changes in operations associated with the Hilgard Bus Terminal are proposed or expected to occur in association with the 2002 LRDP. Please refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 20-18

The comment suggests that Lot 32 on UCLA’s Southwest zone be considered “as an alternative bus station.” In past discussions with the MTA, UCLA committed to provide space on Lot 32 for provision of a transit stop for the MTA’s Red Line, which never materialized at that location. More recent discussions with transit companies concerning the use of Lot 32 have not found this to be a feasible alternative. The issue of an Alternative Site for a bus terminal needs much further study and consideration by the transit agencies involved as well as local elected officials.

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the measures UCLA has taken to reduce the volume of buses at the Hilgard Bus Terminal. As described in Topical Response B, these measures have reduced the volume of bus activity at the Hilgard Bus Terminal to levels that are lower than those that existed in 1990. Furthermore, as described in Topical Response B, the campus remains committed to working with the community, transit agencies, and elected officials to collaborate with all

parties involved to explore other viable short-term and long-term options relating to bus activity at the Hilgard Bus Terminal.

Response to Comment 20-19

This comment is acknowledged. As discussed in Topical Response B (Hilgard Bus Terminal), the University will continue to keep affected neighbors apprised of developments concerning use of the Hilgard Bus Terminal.

Comment Letter 21

VIA FAX 310-206-1510

December 9, 2002

Tova Lelah
Assistant Director
Campus and Environmental Planning
UCLA Capital Programs
1060 Veteran Ave.
Los Angeles, Ca 90095-1365

Re: Draft EIR

Dear Ms. Lelah

I am writing to you in regards to our major concerns as residents at Strathmore and Hilgard, and as a follow up to the public hearing meeting held November 20th 2002.

As I mentioned in the meeting we feel that the EIR did not address the impact of student, faculty and employee growth properly in section 4.13. The reason it is not complete is it did not include in the analysis the population growth impact in conjunction with the UCLA growth over the next ten years and that overall demand on bus service.

The EIR mentions Los Angeles population growth but did not transfer the information to incorporate it with the UCLA population growth when analyzing bus capacity over ten years and the effects on the residents at the extremely busy bus terminal at Strathmore and Hilgard.

One issue is Big Blue Bus has already increased the number of buses and added a new line to their service to UCLA in September 2002. Fortunately this new line goes to the Ackerman Turn Around on Campus. However the point here is the EIR says there is sufficient space on the buses now for the next ten years. Why is Big Blue Bus added buses then? Who will we hold accountable when we see the increase over the next few years in buses and new lines? I will tell you that EIP Associates and UCLA will be on the top of the list.

I have below a list we recently compiled from Big Blue Bus records showing the growth over the last 12 years. Most growth came in the last 5 years:

1990	Weekdays	Saturday	Sunday
Line 1	92	56	46
line 2	56	27	-0-
line 3	34	-0-	-0-
line 8	60	33	17
line 12	31	-0-	-0-
Total	273	116	63

21-1

21-2

21-3

21-4

1997			
line 1	91	56	46
line 2	51	31	-0-
line 3	34	-0-	1
line 8	54	31	16
line 12	28	23	-0-

Total	258	141	63
-------	-----	-----	----

2002 Sept.

line 1	92	64	46
line 2	52	41	39
line 3	44	43	-0-
line 8	56	33	33
line 12	67	23	22

Total	311	204	140
-------	-----	-----	-----

Net increase of additional buses in 12 years, per day:

38	28	77
(14%)	(76%)	(122%)

As you can see from the information provided by Big Blue Bus the increase is significant and has already had an impact on our quality of lives. 1997 to 2002 increase in buses on weekends is 122%.

An additional impact on the residents is the completion of Hillel Student Center. This was built against our wishes and was overbuilt for the area. What this has done is compound the noise coming down our street. As mentioned from Ms. Gray in the public hearing was the decibel reading in and out of our homes. The City of Los Angeles has noise ordinances that this location by far exceeds. We did not see any analysis for this impact. We have measured by analog and digital sound meters that the level at our front doors reaches 85 decibels all day long. The ordinance calls for no more than 50. The level measured inside our homes reaches as high as 65. The closer the home to Hilgard the higher the reading.

There was an article in the LA Times November 19th 2002 stating that "the riders union contends that MTA must put hundreds of new buses on LA County Streets". Mr. Snoble is quoted as saying the final outcome will be "two hundred additional buses" that they are already planning to purchase.

MTA is a major contributor to the UCLA student rider ship and other riders that use the facilities on campus such as concerts, shows, movies, etc. Where are these buses going? The Strathmore Hilgard Terminal was planned for the Campus in 1938. It has outgrown this location 12 years ago.

For the long term plan we are requesting that a new modern facility be put in place and on campus. The future of UCLA is only one of growth and by not dealing with the transportation of masses right now would not be prudent. UCLA is only putting off what is necessary as Los

21-4

21-5

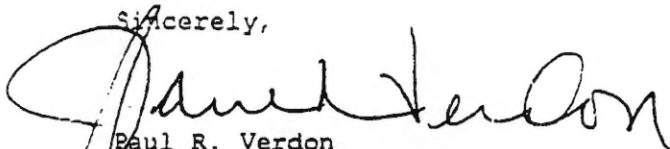
21-6

21-7

Angeles continues to grow; as more residents/students are going to have to use mass transit as an option due to grid lock and right now for the sake of the effected residents on Strathmore and Hilgard.

21-7

Sincerely,



Paul R. Verdon
10544 Strathmore Dr.
Los Angeles, ca 90024

CC
Homeowners
HWPOA
Councilman Weiss
Supervisor Yaroslavsky
Carnesale
Morabito
M. Stocki
Brueggemann

Response to Comment Letter 21

Letter from Paul Verdon, dated December 9, 2002

Response to Comment 21-1

This comment contains introductory information, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. Therefore, no response is required.

Response to Comment 21-2

The traffic analysis in the 2002 LRDP Draft EIR was based upon the projected increases campus population provided in the LRDP (2002 Long Range Development Plan, pages 26 and 27, Tables 6 [Regular Session On-Campus Population] and 7 [Summer Session On-Campus Population]) and the 2002 LRDP Draft EIR (Volume 1, pages 4.10-9 and 4.10-10, Table 4.10-7 [Existing and Projected On-Campus Population—Regular Session] and Table 4.10-8 [Existing and Projected On-Campus Population—Summer Session]), which would result from implementation of the 2002 LRDP. This included not only student growth, but increases in faculty, staff, and campus visitors, associated with the development of an additional 1.7 million gsf of occupied building space, in addition to the projected increases in enrollment. Thus, the 2002 LRDP Draft EIR did address the impacts associated with all growth on the UCLA campus. As noted in the 2002 LRDP Draft EIR (Volume 1, page 4.13-96):

...compared to current conditions, the total number of other commuters is anticipated to decline (as shown in Table 4.13-30) by approximately 954 persons during the regular session (compared to current conditions) due in part to the proposed NHIP. Thus, because the number of "other commuters" would be slightly less than current conditions, utilization of alternative transportation modes would also decrease, and campus-related demand for public transit would also decline slightly.

Cumulative growth in transit ridership, including the impact from the implementation of the 2002 LRDP and other UCLA projects, was included in these figures.

Response to Comment 21-3

Ridership is not expected to increase as a result of UCLA growth. Refer to Response to Comment 21-2. Refer also to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 21-4

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 21-5

This comment is acknowledged. The 2002 LRDP Draft EIR does not evaluate existing or future noise levels associated with the Hillel Student Center since it is not part of the UCLA campus or operations. The Regents were not involved in the planning, design, or approval of the Hillel Student Center and do

not have any regulatory authority over the Hillel property. All noise issues associated with the Hillel Student Center are the responsibility of the City of Los Angeles.

Please refer to Response to Comment 19-10 for a discussion of the Los Angeles Municipal Code noise standards. Please refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 21-6

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 21-7

Refer to Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Lelah, Tova

From: Mills, Stephen
Sent: Monday, December 16, 2002 8:50 AM
To: Zaima, Carole; Kaufman, Lynn; Lelah, Tova; Norlin, Chris; Zacuto, Curtis
Subject: additional comment

-----Original Message-----

From: Patlan, Richard
Sent: Monday, December 16, 2002 8:45 AM
To: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 14 2002 1:45PM
Name: Black, James
Address: 3708 Midvale Ave. #1
City: Los Angeles
State: CA
ZIP: 90034

Organization: UCLA Bicyc
Phone: 310836-2988
Email: jablack@ucla.edu
Date Register: Dec 14 2002 1:44PM
Comment: To Whom it May Concern:

I am a first year Masters of Architecture student at UCLA and I commute to school by bicycle. I am concerned that the draft LRDP does not seem to mention the role of bicycles in meeting UCLA's environmental and transportation goals. 22-1

I request that you make explicit reference to the value of bicycling as a means of achieving UCLA's goals, and would suggest that bicycle-friendly facilities such as showers and bicycle parking be outlined briefly in the plan. 22-2

The UCLA Bicycle Advocacy Committee would be happy to discuss this issue with you further and offer suggestions for specific language or on the best way to implement bicycle-friendly development. 22-3

This is an important opportunity to make UCLA a more bicycle-friendly campus, and I urge you to do so, for the sake of us cyclists and for all the beneficial side effects derived from encouraging students to ride rather than drive to school. 22-4

Thank you for your consideration.

James Black
UCLA M. Arch. I student
jablack@ucla.edu

Response to Comment Letter 22

E-mail from James Black, dated December 14, 2002

Response to Comment 22-1

The 2002 LRDP Draft EIR (Volume 1, page 4.13-16) identified the provision of bicycle facilities as a component of UCLA's Transportation Demand Management (TDM) program. Bicycle commuting as an alternative form of transportation is an integral feature of UCLA's Transportation Demand Management Program (TDM). As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 to 4.13-18), TDM was adopted to achieve UCLA's goals of reducing the number of vehicle trips and parking demand on campus. Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for discussion on UCLA's commitment to bicycle commuting, the value of bicycle commuting in achieving transportation goals and bicycle infrastructure (showers and bicycle parking).

Response to Comment 22-2

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion of UCLA's commitment to bicycle commuting, the value of bicycle commuting in achieving transportation goals and bicycle infrastructure.

Response to Comment 22-3

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion on UCLA's provision of bicycle infrastructure such as current and future development improvements regarding bicycle facilities. UCLA appreciates the assistance of the UCLA Bicycle Advocacy Committee.

Response to Comment 22-4

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion on UCLA's commitment to bicycle commuting, the value of bicycle commuting as an alternative mode of transportation and as an integral feature of the campus's Transportation Demand Management program in achieving transportation and environmental goals of vehicle trip reduction to campus.

Lelah, Tova

From: Mills, Stephen
Sent: Monday, December 16, 2002 8:50 AM
To: Zaima, Carole; Kaufman, Lynn; Lelah, Tova; Norlin, Chris; Zacuto, Curtis
Subject: additional comment

-----Original Message-----

From: Patlan, Richard
Sent: Monday, December 16, 2002 8:45 AM
To: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 12 2002 1:28PM
Name: Bowling, Mollie
Address: 1718 Wellesley Ave.
City: Los Angeles
State: CA
ZIP: 90025
Organization: UCLA Libra
Phone: 310815-6524
Email: mbowling@library.ucla.edu
Date Register: Dec 12 2002 1:27PM
Comment: Thank you for providing us with information about the Long Range Development Plan.

As a long-time employee (28 years) and a long-time bike commuter (22+ years) I am naturally concerned that UCLA promote bicycle commuting and ensure that cyclists are accommodated beside existing buildings and near future ones. I do not see these issues addressed in your Plan. I would like to see a long section about the role of bicycles on campus.

Below are my suggestions:

- 1) California has a "Bike to Work Day" each May. Many employers promote this event - have tables of information, coupons for area bike shops, free t-shirts for cyclists, or whatever. Why couldn't UCLA do this, get reporters up here from the L.A. Times and the Daily News and print write-ups in UCLA publications? UCLA would look good and, over time, would generate more cycling to campus.
- 2) Could all new bike racks be in well-lighted areas? Could they be bolted down? (Could the existing racks be bolted down?) The racks outside of YRL (where I work) are regularly dragged to and down flights of outdoor steps by the local high school skateboarders, to use in their trick riding. Thus repositioned, they are no longer useful as bike racks. I have given up trying to get Transportation to move them back in place.
- 3) Could abandoned bicycles be cut off existing bike racks and taken away after a certain period - say, 6 months? A couple of years ago I struggled between the Police Dept. and Transportation, trying to get somebody to accept responsibility for an abandoned and vandalized bike taking up one of the best spots on a rack I used. I never was successful. Finally someone (a bike activist?) cut away the lock. The bike was so decrepit that it was not even stolen, so after several weeks I wheeled it over to a tree-trimmers dumpster in the Sculpture Garden, from whence it disappeared.
- 4) Could there be mention of bicycling and bicycle accommodations whenever the "we are raising parking rates" letters go out to all the staff? Could bicyclists be profiled in UCLA Today? Could the idea of cycling be promoted whenever possible when transportation issues are discussed?

Thank you for your consideration.

--Mollie Bowling
YRL Serials
11717 YRL

23-1

23-2

23-3

23-4

23-5

Response to Comment Letter 23

E-mail from Mollie Bowling, dated December 12, 2002

Response to Comment 23-1

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion of UCLA's commitment to bicycle commuting, the value of bicycle commuting in achieving transportation goals and bicycle infrastructure.

Response to Comment 23-2

UCLA does in fact promote "Bike to Work Day" with a Bicycle Fair in the third week of May, which is co-sponsored by UCLA Transportation Services and the UCLA Bicycle Advocacy Committee. The event provides bicycle tune-ups, bicycling safety and commuting information along with refreshments and participation in a statewide prize drawing. The event is publicized and covered by the *Daily Bruin*. In addition, the Transportation Services Department sponsors an annual Transportation Fair in the fall where different modes of transportation are promoted. Also, bicycle commuting as an alternative to motor vehicles is promoted by the University through various venues including UCLA Commuter Guide, which is distributed to all incoming student, faculty, and staff. Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for discussion on bicycle commuting promotion and marketing efforts by the University.

Response to Comment 23-3

According to the UCLA Department of Transportation Services, all new bike racks are placed in well-lighted areas. Some bike racks, because of their temporary nature, are not bolted down. The Department indicated that they inspect all campus wide existing bike racks and bolt them down as appropriate. In some instances, bike racks are moved to new locations as bicycle commuting patterns change. In those cases, bike racks in front of some buildings are not bolted as the commuting pattern is in the process of review and the location of racks is moved to determine the best location. Once the commuting pattern or altered commuting pattern is established for a location, the bike racks are then bolted. The issue of the bike rack in front of the YRL has been forwarded to the Department of Transportation Services for resolution. Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for discussion of the campus's bicycle infrastructure and facilities.

Response to Comment 23-4

According to the UCLA Department of Transportation Services, abandoned bicycles are removed on a cyclical basis. Transportation Services inspects all bicycle racks in June and December when students

have left the campus for break to discern which bicycles have been abandoned. Bicycles that appear to be abandoned are then posted with notification of removal date and location of impoundment. The posted bicycles are then held for 90 days. At the end of the 90 day period, all unclaimed bicycles are auctioned by the University of California Police Department. Transportation Services should be contacted if an abandoned bicycle has not been removed.

Response to Comment 23-5

These suggestions have been forward to the UCLA Department of Transportation Services for consideration. Bicycle commuting as an alternative mode of transportation is promoted by the University through various venues including UCLA Commuter Guide, which is distributed to all incoming student, faculty, and staff. Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for discussion of bicycle promotion.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:30 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 16 2002 1:22PM

Name: Hayes, Siobhan

Address: 603 S. Rampart Blvd. #31

City: Los Angeles

State: CA

ZIP: 90057

Organization: School of

Phone: 213385-8052

Email: xivadasilva@yahoo.com

Date Register: Dec 16 2002 1:22PM

Comment: To whom it may concern:

I am writing in regards to UCLA's Long Range Development Plan (LRDP) currently under review. As a cyclist and member of the UCLA Bicycling Advocacy Committee, I believe it is critically important that Capital Programs plan for bicycles at UCLA within the LRDP. Improving and expanding bicycle facilities at UCLA would help increase the number of bicyclists among the UCLA community, which in turn would help the university accomplish many of the transportation, environmental, community health, and recreation goals outlined in the LRDP (such as reducing vehicle trips, reducing parking demand, improving air quality, encouraging resource conservation, and promoting community health and recreation opportunities).

Unfortunately, while the LRDP states that one of UCLA's development objectives is to "[p]rovide and promote opportunities for the use of alternative transportation modes" (Section 3.C.3, p.30), neither bicycling nor bicycle facilities are addressed anywhere within the document. Consequently, I urge you to revise the LRDP to take actions such as:

- (a) install a shower facility in Bunche Hall that is accessible under the same criteria and hours as admittance to the Wooden Center; there is currently no shower facility on north campus and many bikers park in that vicinity;
- (b) create a bike-grade concrete or brick bike-path from the Wooden Center to Royce Hall/College Library; there currently is none and bikers must either walk their bike up the hill or ride up the very steep road along Parking Lot 5;
- (c) work with the city of LA and Santa Monica to clarify what legal rights a biker has on roads designated "Bike Route"; and to communicate those rights to bikers, the UCLA community and surrounding areas, and to local law enforcement.

Please let me know how Capital Programs will revise the LRDP to respond to these issues. I will be following up with your office to ensure that bicycle planning is addressed in the final version of the LRDP.

Sincerely, Siobhan Hayes
School of Public Health
xivadasilva@yahoo.com

Response to Comment Letter 24

E-mail from Siobhan Hayes, dated December 16, 2002

Response to Comment 24-1

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion of UCLA's commitment to bicycle commuting, the value of bicycle commuting in achieving transportation goals and bicycle infrastructure.

Response to Comment 24-2

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion of UCLA's commitment to bicycle commuting, the value of bicycle commuting in achieving transportation goals and bicycle infrastructure.

The following responds to the three points raised in this comment.

- (a) install a shower facility in Bunche Hall that is accessible under the same criteria and hours as admittance to the Wooden Center; there is currently no shower facility on north campus and many bikers park in that vicinity;*

Currently there are no plans to renovate Bunche Hall to include shower facilities. Unfortunately, it is not cost effective for the campus to provide locker and shower facilities in buildings on campus other than those that cater to athletic or recreational use. UCLA Recreation provides the use of such facilities for the students, faculty, and staff with recreation cards at the John Wooden Center, the Sunset Canyon Recreation Center, and the Rehabilitation Center. In addition, the Men's Gym and Kaufman Hall structures will have locker and shower facilities. Both structures are currently under reconstruction with scheduled completion by summer 2003 for the Men's Gym and spring 2004 for Kaufman Hall. All of these campus shower facilities are within a five- to ten-minute bicycle ride from other campus locations.

- (b) create a bike-grade concrete or brick bike-path from the Wooden Center to Royce Hall/College Library; there currently is none and bikers must either walk their bike up the hill or ride up the very steep road along Parking Lot 5;*

Refer to response 26-3 regarding designated bike pathways on campus.

- (c) work with the City of LA and Santa Monica to clarify what legal rights a biker has on roads designated "Bike Route"; and to communicate those rights to bikers, the UCLA community and surrounding areas, and to local law enforcement.*

The campus works with the City of Los Angeles regarding designated bike routes and works with the Metropolitan Transportation Authority and Southern California Association of Governments on regional transportation planning issues including bicycle commuting. For example, the University worked with the City of Los Angeles on providing a set back along Gayley Avenue to assist the City in extending the bike path north to Strathmore Place. On a regional bicycle planning level, the University supports the

Santa Monica Boulevard and Little Santa Monica Boulevard widening project where the two streets will be merged into one with provisions of a new landscaped median and designated bicycle path. The University acknowledges that such an improvement benefits the UCLA biking community. The campus does not work with the City of Santa Monica as the main campus boundaries do not interface with that jurisdiction.

Response to Comment 24-3

Response to these comments in the 2002 LRDP Final EIR will be available for review on the Capital Programs Environmental Planning website and at two on-campus and nine off-campus libraries.

Lelah, Tova

From: Mills, Stephen
Sent: Thursday, December 12, 2002 11:05 AM
To: Zacuto, Curtis; Kaufman, Lynn
Cc: Lelah, Tova; Zaima, Carole; Norlin, Chris
Subject: 1 comments

Comment Letter 25

-----Original Message-----

From: Patlan, Richard
Sent: Thursday, December 12, 2002 11:03 AM
To: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 12 2002 10:07AM
Name: Kaisler, Denise
Address: 8015 F Math Sciences Bldg., UCLA
City: Los Angeles
State: CA
ZIP: 90095
Organization: Division o
Phone: 45582
Email: slnkstr_grl@yahoo.com

Date Register: Dec 12 2002 10:07AM
Comment: UCLA Capital Programs
Attn: Environmental Planning
1060 Veteran Avenue
Los Angeles, CA 90095-1405

Dear Sir/Madam:

As a cyclist and member of the UCLA Bicycling Advocacy committee, I am concerned that UCLA's Long Range Development Plan (LRDP) makes no mention of the role of bicycles on campus. It seems to me that planning for bicycles and promoting them as a valid method of transportation, would help the university accomplish many of the goals already outlined: improving air quality, encouraging resource conservation, promoting community health and recreation opportunities, and most importantly, alleviating the parking crunch that the campus is currently experiencing.

Specific ways in which the current documents may be revised include:

i) acknowledging bicycling as an important part Capital Programs' efforts to achieve the university's transportation, environmental, community health, and recreation goals and to maintain and improve the quality of campus life;

ii) establishing the improvement of bicycling infrastructure at UCLA and the expansion of bicycling among the campus community as top institutional priorities; and

iii) stipulating that bicycle facilities be accommodated in the planning and design of new and renovated buildings at UCLA. UC Santa Cruz could provide a model of a campus which has successfully incorporated bicycles into its infrastructure.

Please let me know how Capital Programs will revise the LRDP to respond to these issues. You can reach me at the address given above.

Best Wishes,

Denise Kaisler
Ph.D. candidate

25-1

25-2

25-3

Response to Comment Letter 25

E-mail from Denise Kaisler, dated December 12, 2002

Response to Comment 25-1

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion of UCLA's commitment to bicycle commuting, the value of bicycle commuting in achieving transportation goals (including accomplishments to achieving goals set by the Southern California Air Quality Management District) and bicycle infrastructure.

Response to Comment 25-2

The following responds to the three points raised in the comment.

- i) acknowledging bicycling as an important part Capital Programs' efforts to achieve the university's transportation, environmental, community health and recreation goals and to maintain and improve the quality of campus life;*

Bicycle commuting as an alternative form of transportation is an integral feature of UCLA's Transportation Demand Management Program (TDM). As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 through 4.13-18), TDM was adopted to achieve UCLA's goals of reducing the number of vehicle trips and parking demand on campus. A reduction in trips results in fewer vehicles driving to campus (especially during peak periods), and thus, fewer air pollutants are emitted on a daily basis. The TDM program also provides mobility options for students, faculty, and staff, such as bicycling, van and car pooling and bus commuting. Therefore, the UCLA TDM program contributes to improvements in regional air quality and supports alternative modes of transportation. Refer to Topical Response D (Bicycling Commuting Conditions and Facilities) for a discussion of UCLA's commitment to bicycle commuting and the value of bicycle commuting in achieving transportation and air quality goals.

The UCLA Transportation Services Department has consistently and incrementally addressed bicycle issues such as access and parking, however, a comprehensive approach or plan addressing campus bicycle infrastructure improvements and goals has not been developed. In response to this comment, the UCLA Transportation Services Department supports development of such a plan and will work with student groups such as the UCLA Bicycle Advocacy Committee and the UCLA bicycling community to develop a bicycle long range plan. Refer to Topical Response D for discussion regarding on and off campus infrastructure improvements. Also, Topical Response D addresses the issue regarding bicycling as an integral component of the UCLA Transportation Demand Management (TDM) program, which focuses on the institution's goal to reduce vehicle trip generation and parking demand on campus.

Refer to Topical Response D for discussion on bicycle facilities on campus.

- ii) *establishing the improvement of bicycling infrastructure at UCLA and the expansion of bicycling among the campus community as top institutional priorities:*

Refer to Response to Comment 25-2 (i) and to Topical Response D regarding discussion on the campus's support to preparation of a bicycle long range plan that will address bicycle infrastructure and goals.

- iii) *stipulating that bicycle facilities be accommodated in the planning and design of new and renovated buildings at UCLA. UC Santa Cruz could provide a model of a campus which has successfully incorporated bicycles into its infrastructure.*

New and renovated buildings on campus include provision of bicycle facilities such as racks and well lighted spaces to promote safe bicycle travel. For example, the proposed Northwest Housing Infill Project in design of the new courtyard spaces between the existing and proposed towers will include bicycle racks. Further, no automobiles will be allowed within those spaces to further provide a safe environment for bicyclists and pedestrians. Also, the commuting patterns of bicyclists are routinely observed by the Transportation Services Department and bike racks are moved to new locations as commuting patterns change. Once the commuting patterns or altered commuting patterns are established for a location, the bike racks are then bolted. Refer to Topical Response D for discussion on bicycle facilities on campus.

Comment acknowledged regarding UC Santa Cruz and its bicycle infrastructure.

Response to Comment 25-3

Response to these comments in the Final EIR will be available for review on the Capital Programs Environmental Planning website and at two on-campus and nine off-campus libraries.

Comment Letter 26

UCLA Capital Programs
Attn: Environmental Planning
1060 Veteran Ave.
Los Angeles, CA 900095-1405

December 16, 2002

To Whom It May Concern:

I am writing in regards to UCLA's Long Range Development Plan (LRDP) which is currently under review. It has come to my attention through my involvement with the UCLA Bicycling Advocacy committee that the LRDP contains no mention of planning for bicycles, and I believe this is a major oversight. Improving and expanding the bicycle facilities at UCLA will help increase the number of individuals who commute to UCLA by bicycle, thereby assisting UCLA in accomplishing many of the transportation, environmental, community health, and recreation goals outlined in the LRDP.

The benefits of bicycling are well known. Bicycling is healthy for the individual and healthy for the air of the community. Parked bicycles take up less space than parked autos, bicycling is economical, bicycling doesn't require gas or oil, and bicycling is fun. Bicycling can help UCLA reduce motor vehicle trips (assisting in staying in compliance with CEQA), reduce auto parking demand, improve air quality, encourage resource conservation, and promote the physical and mental well-being of the UCLA community.

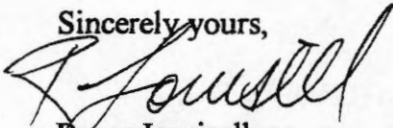
Unfortunately, while the LRDP states that one of UCLA's development objectives is to "[p]rovide and promote opportunities for the use of alternative transportation modes" (Section 3.C.3, p. 30), bicycling and bicycling facilities are omitted from the document. To address this omission, I urge you to take action in the following manner:

1. Acknowledge bicycling as an important part of Capital Program's efforts to achieve the university's transportation, environmental, community health, and recreation goals while improving the campus quality of life;
2. Make the improvement of bicycling infrastructure a top institutional priority; and
3. Stipulate within the LRDP that bicycle facilities, including convenient and well lighted bike parking, safe and interconnected bike lanes, and bathrooms with lockers and showers accessible to bicyclists be accommodated in the planning and design of the new and renovated buildings at UCLA. Work with the UCLA Bicycling Advocacy committee to identify additional priorities.
4. Identify and establish a convenient route from the southern end of campus to the northern end. Currently, students and staff express frustration with having to carry their bicycles up multiple steps to access North Campus.
5. Work with the City of Los Angeles to improve bicycle routes to campus from the surrounding areas. Students and faculty also express frustration especially with the difficulty accessing campus from the East.

UCLA has the opportunity to become a leader in converting Los Angeles County from debilitating dependence on automobiles to experiencing the improved quality of life that making bicycling an integral mode of transportation can provide. But it won't happen without a concerted effort on the part of the UCLA administration. Please do keep me updated as to how Capital Programs will revise the LRDP to respond to these issues, and please feel free to contact me at (310) 235-2710 or be_outside@yahoo.com if I can be of any further assistance. Thank you for your attention to these matters.

26-4

Sincerely yours,



Becca Louisell

11749 Ayres Ave.

Los Angeles, CA 90064

310-235-2710

be_outside@yahoo.com

Member, UCLA Bicycling Advocacy Committee

Member, Planning Committee, Los Angeles County Bicycle Coalition

Name		To
------	--	----

ADMINISTRATIVE VICE CHANCELLOR

Blackman	PWB	
Cornier	WHC	

CAMPUS CAPITAL PROGRAMS

Santon	SGS	
--------	-----	--

CAMPUS ARCHITECT/DESIGN SERVICES

Fisher	MF	
Habtemariam	DH	
Puzauskie	RP	
Lee, Charles	CL	

ENGINEERING SERVICES

MacDougall	JRM	
Almonte	RA	
Jaffari	SIJ	
Pabalan	TPP	
Sebolsky	SLS	

PROJECT MANAGEMENT SERVICES

FitzGerald	KF	
Averill	JA	
Enholm	RKE	
Farmani	ZEF	
Ginther	CNG	
Grant-Martin	MGM	
Heggen	ETH	
Krogstad	JCK	
Pierce	GP	
Tollenaere	ST	X
Townsend	PT	
Wilson	PJW	

CAMPUS CONSTRUCTION SERVICES

LeVanne	TL	
Ayers	MA	
Flaskerud	DF	
Castberg	HCC	
Gardinal	JG	

INSPECTION

Barbour	JB	
Clark	WC	
Henry	RH	
Kell	JK	
Kozdrey	MK	
Yncera	PY	
Young	LY	

OTHER

Fichman	GF	
Johnson	DJ	
Clark	BC	
Parsons		
UCMT-VWV		
UCMT-SM		
JCM Group		

Document Date: 12/16/2002

Project Name: Northwest Campus Phase VI Master Plan

LRDP UPDATE
PLANNING

Project Number: 948380

948365

To: T. LELAH,

From: LOUISELL

Precis/Comments:

RE: PROJECT IMPACT.

(ORIGINALS TO
T. LELAH)

HEALTH SCIENCES CAPITAL PROJECTS

O'Donnell	MOD	
Schwarz	ACS	
Conde	GAC	
Gregory	WG	
Robinson	DR	
Voltz	MV	
Kenyon	LK	
Lee, Alvin	AL	
Azar	RA	
Robbins	SR	
Hattarki	RH	
Spataru	AMS	
Schiveley	JS	
Weiler	MW	
Norris	BN	
Hernandez	AH	
White	JW	
Moss	SM	
Frost	JRF	
Wilton	SW	
Yeganeh	LY	
D'Amico	JAD	
Aroyan	AA	
Walker	AEW	
Denton	MD	
Sidley	KMS	
Yeley	BY	
Chen	JC	
Stahl	SS	
Wigginton	JW	
Hawk	DCH	

Letter: ☒
Report: ☐
Minutes: ☐
Sub/Trans: ☐
AO 375: ☐
Approval: ☐
Other: ☐

CAPITAL FINANCE & STRATEGY

Dolmseth	SD	
Shivers	NS	
Coleman	WC	
Leish	TL	X
Kaufman	LK	
Zacuto	CZ	
Gray	DG	
Farakly	SF	
Phung	YP	
Dale	DD	

CONTRACT SERVICES

Baker		

Response to Comment Letter 26

Letter from Becca Louisell, dated December 16, 2002

Response to Comment 26-1

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion of UCLA's commitment to bicycle commuting, the value of bicycle commuting in achieving transportation goals and bicycle infrastructure.

Response to Comment 26-2

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion of UCLA's commitment to bicycle commuting, the value of bicycle commuting in achieving transportation goals (specifically in reducing vehicle trips and parking demand; and goals set by the Southern California Air Quality Management District) and bicycle infrastructure.

Response to Comment 26-3

The following responds to the five action points raised in the comment letter.

- 1. Acknowledge bicycling as an important part of Capital Program's efforts to achieve the university's transportation, environmental, community health and recreation goals while improving the campus quality of life;*

Refer to Response to Comment 25-2 (i) regarding bicycling as important goal for the University. Refer to Topical Response D (Bicycling Commuting Conditions and Facilities) for discussion regarding on- and off-campus infrastructure improvements. Also, Topical Response D addresses the issue regarding bicycling as an integral component of the UCLA Transportation Demand Management (TDM) program, which focuses on the institution's goal to reduce vehicle trip generation and parking demand on campus.

- 2. Make the improvement of bicycling infrastructure a top institutional priority;*

Refer to Response to Comment 25-2 (ii) and to Topical Response D regarding discussion on the campus's commitment to prepare a bicycle long range plan that will address bicycle infrastructure and goals.

- 3. Stipulate within the LRDP that bicycle facilities, including convenient and well lighted bike parking, safe and interconnected bike lanes, and bathrooms with lockers and showers accessible to bicyclists be accommodated in the planning and design of the new and renovated buildings at UCLA. Work with the UCLA Bicycling Advocacy committee to identify additional priorities;*

On-campus roadways are designated for use by bicyclists for traversing the campus. Specifically designated off-road bicycle pathways are not provided on campus for safety purposes. Designated bicycle-only pathways, or lanes, on campus is difficult, if not impossible, to provide, as the campus

would need to monitor to make sure the paths are used exclusively by bicyclists and not pedestrians. Historically, many accidents have occurred on campus when bicyclists and pedestrians have interfaced on the same pathway. Pursuant to State Vehicle Code Section 21113(f), campus pathways are restricted for pedestrian use to ensure safety for bicyclists and pedestrians. In order to maintain pedestrian and bicyclist safety, the "interconnected bike lanes" suggested in the comment are infeasible. However, bicyclists are permitted to walk their bikes on the pathways as well as to utilize on-campus (ADA) ramps providing right-of-way is given to persons using wheelchairs. Newly installed ramps are located between the Wooden Center and Dickson Plaza, which can be utilized in order to avoid using multiple steps that are found in this location.

UCLA has previously studied the feasibility of bike lanes on campus roadways and concluded that bicycle lane accommodation is infeasible and unlikely due to constrained roadway width, which directly affects overall roadway safety.

Unfortunately, it is not cost effective for the campus to provide locker and shower facilities in buildings on campus other than those that cater to athletic or recreational use. Therefore, the suggestion to provide additional shower and locker facilities on campus in non-athletic and non-recreation buildings is economically infeasible. UCLA Recreation provides the use of such facilities for students, faculty, and staff with recreation cards at the John Wooden Center, the Sunset Canyon Recreation Center, and the Rehabilitation Center. In addition, the Men's Gym and Kaufman Hall structures will have locker and shower facilities. Both structures are currently under reconstruction with scheduled completion by summer 2003 for the Men's Gym and spring 2004 for Kaufman Hall.

As previously stated, the campus will prepare a bicycle long range plan and will work with student groups such as the UCLA Bicycling Advocacy Committee and the UCLA bicycling community to develop the plan.

4. *Identify and establish a convenient route from the southern end of campus to the northern end. Currently, students and staff express frustration with having to carry their bicycles up multiple steps to access North Campus;*

As discussed above, bicyclists are permitted to walk their bikes on campus pathways as well as to utilize on-campus (ADA) ramps providing right-of-way is given to persons using wheelchairs. Newly installed ramps are located between the Wooden Center and Dickson Plaza can be utilized in order to avoid using multiple steps that are found in this location to access North Campus. Bicycle infrastructure and access will be addressed in the bicycle long range plan. Refer to discussion above (number 3), regarding infeasibility of providing bicycle only pathways, or lanes, on campus.

5. *Work with City of Los Angeles to improve bicycle routes to campus from the surrounding areas. Students and faculty also express frustration especially with the difficulty accessing campus from the East.*

The campus works with the City of Los Angeles regarding designated bike routes and works. For example, the campus provided a setback along Gayley Avenue in the vicinity of the new replacement hospital for the future extension by the City of Los Angeles of a marked bicycle lane along the east side of the roadway. Refer to Topical Response D for discussion regarding on and off campus infrastructure improvements. The campus will continue to work with the City of Los Angeles on all bicycle routes and access to campus especially routes from the east.

Response to Comment 26-4

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for discussion of UCLA's commitment to bicycle commuting and its contribution to the Transportation Demand Management program and assistance in the overall reduction in vehicle trips to campus and resulting regional air quality improvements. Also refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for discussion of UCLA's effort in promoting bicycle commuting. Responses to these comments will be available for review in the Final EIR on the UCLA Capital Programs Environmental Planning website and at two on-campus libraries and nine off-campus libraries.

EnvPin

From: Patlan, Richard
Sent: Thursday, December 19, 2002 8:31 AM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 18 2002 6:31PM
Name: Nelson, Jeremy
Address: 6500 Yucca St. #320
City: Los Angeles
State: CA
ZIP: 90028-4934
Organization: UCLA Bicyc
Phone: 323691-9848
Email: jnelson101@attbi.com
Date Register: Dec 18 2002 6:31PM
Comment: To whom it may concern:

I am writing in regards to UCLA's Long Range Development Plan (LRDP) currently under review. As a cyclist and member of the UCLA Bicycling Advocacy Committee, I believe it is critically important that Capital Programs plan for bicycles at UCLA within the LRDP. Improving and expanding bicycle facilities at UCLA would help increase the number of bicyclists among the UCLA community, which in turn would help the university accomplish many of the transportation, environmental, community health, and recreation goals outlined in the LRDP (such as reducing vehicle trips, reducing parking demand, improving air quality, encouraging resource conservation, and promoting community health and recreation opportunities).

27-1

Unfortunately, while the LRDP states that one of UCLA's development objectives is to "[p]rovide and promote opportunities for the use of alternative transportation modes" (Section 3.C.3, p.30), neither bicycling nor bicycle facilities are addressed anywhere within the document. Consequently, I urge you to revise the LRDP to:

- a) Acknowledge bicycling as an important part Capital Programs' efforts to achieve the university's transportation, environmental, community health, and recreation goals and to maintain and improve the quality of campus life;
- b) Establish the improvement of bicycling infrastructure at UCLA and the expansion of bicycling among the campus community as top institutional priorities; and
- c) Stipulate that bicycle facilities (e.g., convenient and well-lighted bike parking, safe and interconnected bike lanes, and bathrooms with lockers and showers for bicyclists) be accommodated in the planning and design of new and renovated buildings at UCLA.

27-2

Please let me know how Capital Programs will revise the LRDP to respond to these issues. I will be following up with your office to ensure that bicycle planning is addressed in the final version of the LRDP.

27-3

Sincerely,
Jeremy Nelson
Graduate Student, Dept. of Urban Planning
Member, UCLA Bicycling Advocacy Committee

Response to Comment Letter 27

E-mail from Jeremy Nelson, dated December 18, 2002

Response to Comment 27-1

Bicycle commuting as an alternative form of transportation is an integral feature of UCLA's Transportation Demand Management Program (TDM). As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 to 4.13-18), TDM was adopted to achieve UCLA's goals of reducing the number of vehicle trips and parking demand on campus. A reduction in trips results in fewer vehicles driving to campus (especially during peak periods), and thus, fewer air pollutants are emitted on a daily basis. The TDM program also provides mobility options for students, faculty, and staff, such as bicycling, van and car pooling, and bus commuting. Therefore, the UCLA TDM program contributes to improvements in regional air quality and supports alternative modes of transportation. Refer to Topical Response D (Bicycling Commuting Conditions and Facilities) for a discussion of UCLA's commitment to bicycle commuting and the value of bicycle commuting in achieving transportation and air quality goals.

Response to Comment 27-2

The following responds to the three points raised in the comment.

- a) Acknowledge bicycling as an important part Capital Programs' efforts to achieve the university's transportation, environmental, community health, and recreation goals to maintain and improve the quality of campus life;*

Refer to Response to Comment 25-2 (i) regarding importance of bicycling and efforts to achieving the University's stated goals. Refer to Response to Comment 27-1 above regarding bicycling as an important effort to achieve the university's transportation goals and improvement to regional air quality. Refer to Topical Response D (Bicycling Commuting Conditions and Facilities) for discussion regarding on and off campus infrastructure improvements. Also, Topical Response D addresses the issue regarding bicycling as an integral component of the UCLA Transportation Demand Management (TDM) program, which focuses on the institution's goal to reduce vehicle trip generation and parking demand on campus.

- b) Establish the improvement of bicycling infrastructure at UCLA and the expansion of bicycling among the campus community as top institutional priorities;*

Refer to Response to Comment 25-2 (ii) and to Topical Response D regarding discussion on the campus's commitment to prepare a bicycle long range plan that will address bicycle infrastructure and goals.

- c) Stipulate that bicycle facilities (e.g., convenient and well-lighted bike parking, safe and interconnected bike lanes, and bathrooms with lockers and showers for bicyclists) be accommodated in the planning and design of new and renovated buildings at UCLA.*

Refer to Response to Comment 26-3 (3) regarding bicycle facilities.

Response to Comment 27-3

Responses to these comments will be available for review in the 2002 LRDP Final EIR on the UCLA Capital Programs Environmental Planning website and at two on-campus libraries and nine off-campus libraries.

Los Angeles, December 14, 2002

To whom it may concern:

I am writing in regards to UCLA's Long Range Development Plan (LRDP) currently under review. I am an Urban Planning student, and aware of the significant personal, social and environmental benefits of bicycling, I use that transportation mean to go to campus everyday.

28-1

I see in the LRDP project a valuable potential for making UCLA a bicycle friendly environment, and unfortunately I could not find a comprehensive approach to that in the future plans.

I am a member of the UCLA Bicycling Advocacy Committee, and we would be happy to suggest our many ideas to be incorporated in the plan, making a consolidated effort to achieve the transportation, environmental, community health, and recreation UCLA goals. Encouraging bicycling would have a tremendous impact in the quality of life of all campus population, and could make UCLA become a leader in the development of alternative transportation strategies for Southern California, and complement the education experience that UCLA offers.

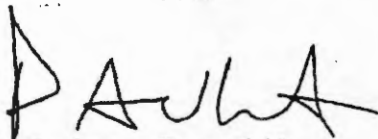
28-2

I respectfully ask the LRDP team to consider the benefits of encouraging alternative methods of transportation, and support improvements in infrastructure, education and facilities for cyclists.

28-3

Please, contact me regarding any comment or questions,

Sincerely,



Paula Castro Rosenfeld
Graduate Student, Urban Planning Department
paulacr@ucla.edu

Response to Comment Letter 28

Letter from Paula Castro Rosenfeld, dated December 14, 2002

Response to Comment 28-1

Refer to Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion of UCLA's commitment to bicycle commuting, the value of bicycle commuting in achieving transportation goals and bicycle infrastructure.

Response to Comment 28-2

Bicycle commuting as an alternative form of transportation is an integral feature of UCLA's Transportation Demand Management Program (TDM). As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 to 4.13-18), TDM was adopted to achieve UCLA's goals of reducing the number of vehicle trips and parking demand on campus. A reduction in trips results in fewer vehicles driving to campus (especially during peak periods), and thus, fewer air pollutants are emitted on a daily basis. The TDM program also provides mobility options for students, faculty, and staff, such as bicycling, van and car pooling, and bus commuting. Therefore, the UCLA TDM program contributes to improvements in regional air quality and supports alternative modes of transportation. Refer to Topical Response D (Bicycling Commuting Conditions and Facilities), Responses to Comments 25-2, 26-3, and 27-1 for a discussion of UCLA's commitment to bicycle commuting and the value of bicycle commuting in achieving transportation and air quality goals.

Response to Comment 28-3

Responses to these comments will be available for review in the Final EIR on the UCLA Capital Programs Environmental Planning website and at two on-campus libraries and nine off-campus libraries.

UCLA Capital Programs
Attn: Environmental Planning
1060 Veteran Avenue
Los Angeles, CA 90095-1405

Comment Letter 29

To whom it may concern:

I am writing to comment on UCLA's proposed Long Range Development Plan (LRDP). As a bicycle commuter, a member of the UCLA Bicycling Advocacy Committee, a UCLA Graduate Student, and a UCLA Librarian I believe it is absolutely necessary that Capital Programs include a plan for bicycles at UCLA within the LRDP. Improving and expanding bicycle facilities at UCLA—which is presently sorely needed—will help increase the number of bicyclists among the UCLA community, which in turn will help UCLA accomplish many of the transportation, environmental, community health, and recreation goals outlined in the LRDP (such as reducing vehicle trips, reducing parking demand, improving air quality, encouraging resource conservation, and promoting community health and recreation opportunities).

29-1

Unfortunately, while the LRDP states that one of UCLA's development objectives is to "[p]rovide and promote opportunities for the use of alternative transportation modes" (Section 3.C.3, p.30), neither bicycling nor bicycle facilities are addressed anywhere within the document. Why is this?

As a result of my acute concern for this oversight I recommend that the following concerns be included within a revised LRDP:

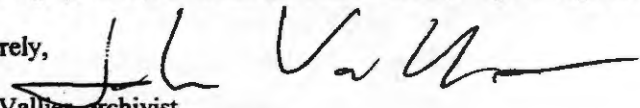
- a) Acknowledge bicycling as an important part Capital Programs' efforts to achieve UCLA's transportation, environmental, community health, and recreation goals and to maintain and improve the quality of campus life;
- b) Establish the improvement of bicycling infrastructure at UCLA and the expansion of bicycling among the campus community as top institutional priorities; and
- c) Stipulate that bicycle facilities (i.e., convenient and well-lighted bike parking, safe and interconnected *bike lanes*, and bathrooms with lockers and showers for bicyclists) be accommodated in the planning and design of new and renovated buildings at UCLA.

29-2

Please let me know how Capital Programs will revise the LRDP to respond to these issues. I will be following up with your office to ensure that bicycle planning is addressed in the final version of the LRDP.

29-3

Sincerely,


John Vallier, archivist
UCLA Ethnomusicology Archive
1630 Schoenberg Music Building, Box 951657
Los Angeles, California 90095-1657
phone (310) 825-1695 fax (310) 206-4738
<http://www.ethnomusic.ucla.edu/archive/>

Response to Comment Letter 29

Letter from John Vallier, dated December 20, 2002

Response to Comment 29-1

Bicycle commuting as an alternative form of transportation is an integral feature of UCLA's Transportation Demand Management Program (TDM). As discussed in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 through 4.13-18), TDM was adopted to achieve UCLA's goals of reducing the number of vehicle trips and parking demand on campus. A reduction in trips results in fewer vehicles driving to campus (especially during peak periods), and thus, fewer air pollutants are emitted on a daily basis. The TDM program also provides mobility options for students, faculty, and staff, such as bicycling, van and car pooling, and bus commuting. Therefore, the UCLA TDM program contributes to improvements in regional air quality and supports alternative modes of transportation. Refer to Topical Response D (Bicycling Commuting Conditions and Facilities) and Responses to Comments 25-2, 26-3, and 27-1 for a discussion of UCLA's commitment to bicycle commuting and the value of bicycle commuting in achieving transportation and air quality goals.

Response to Comment 29-2

The UCLA Transportation Services Department has consistently and incrementally addressed bicycle issues such as access and parking, however, a comprehensive approach or plan addressing bicycling, bicycling facilities, campus bicycle infrastructure and goals has not been developed. In response to this comment, the UCLA Transportation Services Department will work with student groups such as the UCLA Bicycle Advocacy Committee and the UCLA bicycling community to develop a bicycle long range plan. Also, refer to Response to Comment 27-1 regarding bicycling as an important effort to achieve the university's transportation goals and improvement to regional air quality.

The following responds to the three points raised in the comment.

- a) Acknowledge bicycling as an important part Capital Programs' efforts to achieve the university's transportation, environmental, community health, and recreation goals to maintain and improve the quality of campus life;*

Refer to Response to Comment 25-2 (i) regarding importance of bicycling and efforts to achieving the University's stated goals. Refer to Response to Comment 27-1 above regarding bicycling as an important effort to achieve the university's transportation goals and improvement to regional air quality. Refer to Topical Response D (Bicycling Commuting Conditions and Facilities) for discussion regarding on and off campus infrastructure improvements. Also, Topical Response D addresses the issue regarding bicycling as an integral component of the UCLA Transportation Demand Management (TDM) program, which focuses on the institution's goal to reduce vehicle trip generation and parking demand on campus.

- b) *Establish the improvement of bicycling infrastructure at UCLA and the expansion of bicycling among the campus community as top institutional priorities;*

Refer to Response to Comment 25-2 and to Topical Response D regarding discussion on the campus's commitment to prepare a bicycle long range plan that will address bicycle infrastructure and goals.

- c) *Stipulate that bicycle facilities (e.g., convenient and well-lighted bike parking, safe and interconnected bike lanes, and bathrooms with lockers and showers for bicyclists) be accommodated in the planning and design of new and renovated buildings at UCLA.*

Refer to Response to Comment 26-3 (3) regarding bicycle facilities.

Response to Comment 29-3

Responses to these comments will be available for review in the 2002 LRDP Final EIR on the UCLA Capital Programs Environmental Planning website and at two on-campus libraries and nine off-campus libraries.



DONALD C. SHOUP
PROFESSOR OF URBAN PLANNING
TEL: (310) 825-5705
FAX: (310) 206-5566
SHOUP@UCLA.EDU

DEPARTMENT OF URBAN PLANNING
SCHOOL OF PUBLIC POLICY AND SOCIAL RESEARCH
3250 PUBLIC POLICY BUILDING
UNIVERSITY OF CALIFORNIA
LOS ANGELES, CALIFORNIA 90095-1656

December 16, 2002

Mr. Curtis Zacuto
Principal Environmental Planner
UCLA Capital Programs
1060 Veteran Avenue
Los Angeles, CA 90095-1365

RE: SHOULD BRUINGO BE MADE PERMANENT?

Dear Mr. Zacuto:

I am writing to comment on the Draft Environmental Impact Report for UCLA's 2002 Long Range Development Plan. The EIR states that implementation of the Development Plan will substantially increase traffic congestion and vehicle emissions in Westwood. The EIR also states that continuing BruinGO is not a feasible strategy to mitigate these impacts: "*Transit subsidies for faculty and staff have previously been evaluated and have not been recommended because of the limited potential to reduce total parking demand.*" (page 4.13-47). The EIR does not even mention the option of continuing BruinGO for students.

The EIR's rejection of BruinGO as a traffic mitigation measure is completely at odds with the evaluations of BruinGO conducted by your traffic consultant and by UCLA's Institute of Transportation Studies.

BruinGO substantially increased bus ridership for commuting to campus during its first year (2000-2001). BruinGO is offered in partnership with the Santa Monica Blue Bus, and about 7,400 faculty and staff live within the Blue Bus service area (35 percent of all faculty and staff). For faculty and staff who live *inside* the Blue Bus service area, the bus mode share for commuting rose from 8.6 percent to 20.1 percent in the year after BruinGO began. The total number of faculty/staff bus commuters in the Blue Bus service area increased by 134 percent ($11.5 \div 8.6$), and 57 percent of all the bus riders were new

Faculty/staff bus share for commuting

	<u>Blue Bus Service Area</u>	
	<i>Inside</i>	<i>Outside</i>
<i>Before BruinGO</i>	8.6%	7.2%
<i>With BruinGO</i>	20.1%	7.6%
Difference	11.5%	0.4%
Percent change	134%	6%

Source: Crain & Associates (2002, Tables 3 & 4)

30-1

30-2

30-3

riders (11.5 ÷ 20.1). For those who live *outside* the Blue Bus service area, bus ridership remained essentially unchanged. These results were reported by your transportation consultant for the EIR, Crain and Associates, who evaluated BruinGO's performance during 2000-2001.¹

The shift to public transit significantly reduced solo driving to campus: 37 percent of the new bus riders were former solo drivers. Even commuters with parking permits occasionally rode the bus: among permit holders who live within the Blue Bus service area, 19 percent reported that they used BruinGO, and that they rode the bus to campus an average of two days a week.² The number of faculty/staff solo drivers to campus fell 9 percent among those who live inside the Blue Bus service area.

Another study examined the changes in travel patterns of the 17,000 students who live within the BruinGO service area (44 percent of all students).³ During BruinGO's first year, the students' transit ridership for commuting to campus increased by 43 percent, and solo driving decreased by 33 percent. Again, these changes are significant.

These increases in bus ridership and reductions in solo driving refer only to the changes that occurred during BruinGO's first year. During its second year (2001-2002), total BruinGO ridership increased by a further 27 percent, so its effectiveness has since increased.

Despite the large increases in bus ridership and declines in solo driving after BruinGO began, the EIR dismisses the option of continuing BruinGO. This rejection of BruinGO as a traffic mitigation strategy raises several questions.

Is more than doubling the number of faculty and staff who ride the bus to campus an insignificant change? Is a 9-percent reduction in solo driving to campus an insignificant change?

UCLA's total fare payments for faculty and staff during BruinGO's first year were \$160,000, which is equivalent to the cost of five new parking spaces in the IM Field Parking Structure. Is this too much for UCLA to pay to continue BruinGO for all faculty and staff?

Is the 43-percent increase in students' bus ridership to campus an insignificant change? Is the 33-percent reduction in solo driving an insignificant change? Why does the LRDP not even mention the option of continuing BruinGO for students?

PAYING FOR BRUINGO

Perhaps the EIR assumed that BruinGO costs too much to consider as a way to mitigate UCLA's traffic generation. What other reason would UCLA have for not continuing BruinGO? I will suggest two ways to pay for BruinGO, either of which can finance its full cost.

Option 1. Use some released parking spaces for daily sales

BruinGO caused more than 1,000 student, staff, and faculty commuters to give up their parking spaces and take the Blue Bus to UCLA. These released spaces did not remain vacant, of course, because UCLA can sell them to daily visitors or to students on the wait list for a parking

permit. Because the released spaces would not have been available to new users without BruinGO, the added revenue can be used to pay for BruinGO.

The UCLA Parking Service estimates that each daily-sales parking space generates \$1,200 per year more than a permit space.⁴ This occurs because visitors pay \$2 per hour or \$7 per day parking on campus, but most students, staff, and faculty pay only \$54 per month for permits.⁵ If only half the 1,000 spaces released by commuters who shifted from solo driving to transit were used for daily sales rather than permits, UCLA would earn an additional \$600,000 a year in parking revenue to pay for BruinGO. Beyond paying for BruinGO, increasing the number of spaces available for visitors will enable the university to welcome more people to its museums, libraries, concerts, lectures, plays, conferences, and athletic events. Students, staff, and faculty who regularly commute by bus will also find it easier to pay for parking on campus on days when they need their cars. This change will also help to counter UCLA's image as an ivory tower with parking as its moat.

Option 2. Use BruinGO to replace the Campus Express

In FY 2000-2001, UCLA paid the Blue Bus \$640,000 to carry 1.4 million BruinGO riders to and from campus (45¢ per trip), while it paid \$1.9 million to transport 1.3 million riders for much shorter trips on the Campus Express (\$1.41 per trip). Some universities have merged their campus shuttles with the local public transit systems to take advantage of the government subsidies that are available only for public transit. If UCLA merges its shuttle service into BruinGO, it would save the \$1.9 million a year it now spends for the Campus Express.

The Blue Bus could reroute two or three of its five lines that now stop at the edge of campus, and bring them on campus to follow the Campus Express routes. One Blue Bus line and one Culver City (Green Bus) line to UCLA already duplicate the Westwood Village-to-Ackerman Union route, so including the Green Bus in BruinGO could replace that route. Because most on-campus rides would be very short, and would occupy otherwise empty seats, the transit agencies could charge a low fare compared with UCLA's cost of \$1.41 per ride on the Campus Express.

The savings from merging the shuttle service into BruinGO should be more than enough to pay for BruinGO, and to expand the program to include the Green Bus. The total cost of BruinGO will increase because of the payments for all the on-campus shuttle rides, but each ride shifted from the existing shuttle service to BruinGO would save 96¢ (\$1.41 for the Campus Express but only 45¢ for BruinGO). For the current 1.3 million shuttle rides per year, the savings would be \$1.25 million per year, which should be enough to pay the full cost of the expanded BruinGO program.⁶

Campus Express Map

Merging the shuttle system with BruinGO will also provide better on-campus transit service. The Campus Express shuts down in the evening and on weekends and holidays, but the Blue Bus and the Green Bus operate in the evening and on weekends and holidays, so riders will enjoy more frequent service with extended hours. This strategy will also improve BruinGO itself, because bus riders could travel directly to the center of campus, rather than only to the

30-12

30-13

30-14

edge of campus. Because the Culver City Bus line to campus passes several off-campus student housing complexes, including it in BruinGO will also improve many students' access to campus. Bringing BruinGO onto campus would also respond to the nearby residents' complaints about the traffic, air quality, and noise at the Hilgard Avenue bus terminal.

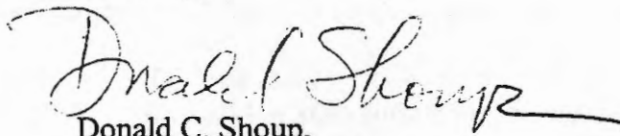
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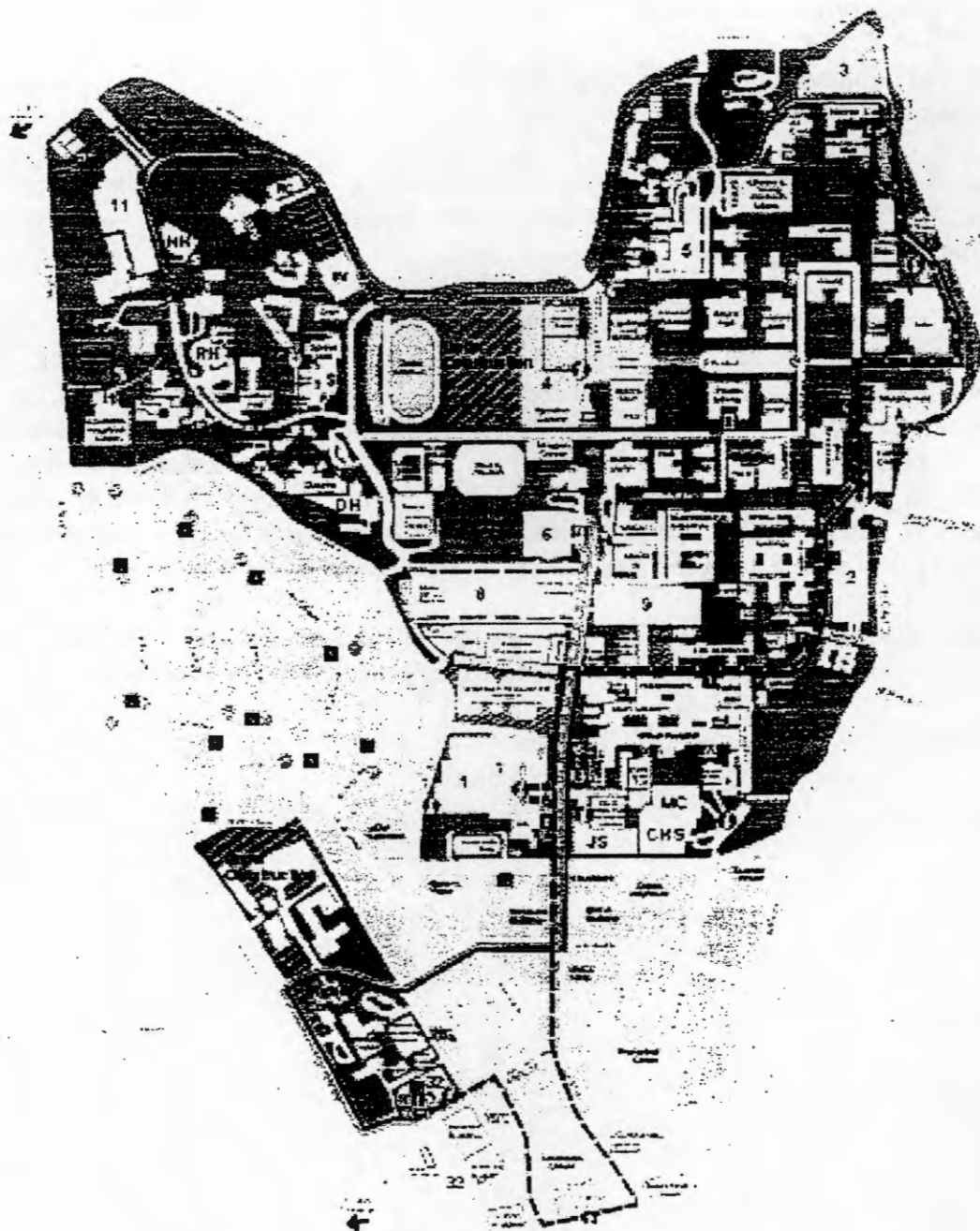
CONCLUSION

The evaluations conducted by both Crain and Associates and the Institute of Transportation Studies show that BruinGO is a feasible way reduce UCLA's traffic generation. The EIR's failure to seriously consider this mitigation strategy raises serious questions about the university's priorities. Chancellor Carnesale has told the Academic Senate that "our budget should reflect our strategy." UCLA plans to construct 4,149 new parking spaces but not to continue BruinGO. What transportation strategy does this budget reflect?

30-15

Sincerely,


Donald C. Shoup,
Professor of Urban Planning



ENDNOTES

1. Crain and Associates, "UCLA BruinGO! Transit Pass Program," Prepared by for UCLA Transportation Services, April 2002.
2. Permit Holders Survey of the BruinGO Transit Pass Program, UCLA Transportation Services, March 2002.
3. Boyd, Brent, Melissa Chow, Robert Johnson, and Alexander Smith. "University Transit Passes: An Evaluation." UCLA Master's degree client project prepared for the Los Angeles County Metropolitan Transportation Authority, 2002.
4. The Transportation Service reported to the Transportation Services Advisory Board that each *permit* converted to daily sales generates an additional \$897 in annual revenue. Because UCLA sells 1.35 permits per space, each *space* converted to daily sales generates an additional \$1,211 in annual revenue. Each space converted to meters will generate an even greater increase in revenue. This estimate is *extremely* conservative because it assumes that the each daily-sales space generates only \$7 per day. UCLA's *2002 Long Range Development Plan Draft Environmental Impact Report* states that each daily-sales space turns over 2.8 times per day, which implies that each space generates \$20 per day (see Table 4.13-6.)
5. Daily sales revenue comes both from the spaces reserved for daily sales, and from other spaces that are not used by permit holders in the evenings and on the weekends.
6. In 2002-2003 the fee that UCLA pays to the Blue Bus may increase to 60 cents per boarding. At this price, the savings from shifting riders from the Campus Express to BruinGO are 81 cents per boarding (\$1.41 - \$0.60), or \$1.1 million per year (\$0.81 x 1.3 million rides).

Response to Comment Letter 30

Letter from Don Shoup, dated December 16, 2002

Response to Comment 30-1

Comment acknowledged. Refer to Topical Response A (BruinGo Program), which clarifies that the 2002 LRDP Draft EIR did not reach any conclusion regarding the future of the program.

Response to Comment 30-2

Comment acknowledged. Refer to Topical Response A (BruinGo Program), which made clear that the 2002 LRDP Draft EIR did not reject BruinGo as a feasible mitigation measure.

Response to Comment 30-3

Comment acknowledged. Refer to Topical Response A (BruinGo Program), which indicates that continuation of the program has been proposed.

Response to Comment 30-4

Comment acknowledged. Refer to Response to Comment 30-3 and Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 30-5

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 30-6

No citation was provided by the comment to indicate the source of the data citing an increase in transit ridership in the second year of the BruinGo pilot program. If this comment refers to the study cited in Comment 30-5, as noted above, the University has not formally reviewed the results of the study prepared by the graduate students, and therefore cannot comment on the reported results. Refer also to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 30-7

Refer to Topical Response A (BruinGo Program), which reiterates that the 2002 LRDP Draft EIR did not reject BruinGo as a feasible mitigation measure.

Response to Comment 30-8

Refer to Response to Comment 30-3 and Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 30-9

As noted in Topical Response A (BruinGo Program), the campus has proposed to continue BruinGo.

Response to Comment 30-10

Refer to Topical Response A (BruinGo program) for a discussion of the BruinGo program.

Response to Comment 30-11

The EIR did not make any assumptions concerning the cost of BruinGo. As noted in the 2002 LRDP Draft EIR (Volume 1, page 4.13-46):

The campus has extended the BruinGo transit pass pilot program for another year and will further evaluate the potential of the program to cost-effectively reduce parking demand. The University will continue to search for strategies to reduce parking demand and trip generation that are both cost-effective and attractive to faculty, staff, and students.

Refer also to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 30-12

The comment does not provide a citation for the suggestion that 1,000 students, staff, and faculty gave up their parking spaces as a result of the BruinGo pilot program. If 1,000 spaces were to become available and those spaces were used to provide permits to students that currently do not have permits, then the income associated with those spaces would generally replace existing permit fees for those spaces.

The supply of on-campus visitor parking is provided based on historical patterns of visitor demand. Although there are times when visitor parking may not be available at some locations (e.g., the central campus mid-day on certain weekdays), the supply of visitor parking is considered adequate to meet demand, as space is usually available in other campus lots. There is no evidence to support the suggestion that visitor demand is sufficient to utilize half of the postulated 1,000 parking spaces, and thus the potential for increased visitor demand to generate sufficient income from daily sales to support the BruinGo program is speculative. Refer also to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 30-13

The suggestion that the University could save \$1.9 million a year by "merging" the Campus Express into the BruinGo program implies that such an action would be at no cost to the University. There is no evidence to support this contention. Further, the University considers the potential for the SMMBL to absorb the entire cost of such a merger as extremely remote. There is no evidence to support the

suggestion that such a merger would result in any cost savings, or that government subsidies would be available to offset a portion of operational costs.

Rerouting additional public transit lines onto the campus would result in several operational issues, including the need to identify layover zones (where buses wait while drivers take a break) and increased traffic congestion at some locations (because of the larger size of public transit buses and the potential for several buses to arrive at one point simultaneously). As noted in Topical Response A (BruinGo Program), the Culver City Municipal Bus Lines declined to participate in the BruinGo pilot program. There is no evidence to support the suggestion that public transit operators have an ability to charge differential fares based upon rider destination (e.g., a smaller fare for on-campus trips).

It should also be noted that in addition to providing shuttle service around campus, Campus Express drivers also offer information and direction to visitors to campus. It is unlikely that public transit drivers could offer a similar benefit to on-campus bus patrons.

The suggestion that merging the Campus Express into BruinGo would result in \$1.25 million savings per year is based on the previous fare of \$0.45 per ID card swipe. As of July 1, 2002, the fare on the Big Blue Bus increased from 45 to 62 cents per BruinGo rider and (from 50 to 75 cents for cash fares). As noted above, there is no evidence to support the suggestion that such a merger would result in any cost savings, or that government subsidies would be available to offset operational costs. Refer also to Topical Response A for a discussion of the BruinGo program.

Response to Comment 30-14

With eighteen existing bus routes currently providing service to the campus and routes that utilize Sunset Boulevard, Hilgard Avenue, Le Conte Avenue, and Gayley Avenue, a bus line is currently available only a relatively short distance from most locations on campus. Although extending two or three public transit routes onto campus might increase rider convenience, because some bus stops would be located in the center of campus rather than the edge of campus, as noted in Response to Comment 30-14, various operational and fiscal issues would need to be addressed.

The comment did not provide any evidence to support the suggestion that frequency of service would be improved. Currently, Campus Express shuttles operate with an approximate 7 to 10-minute headway during peak hours. As the SMMBL is currently the only transit operator participating in the BruinGo pilot program, current service frequency for those lines that provide service to campus can be used as an indicator of the potential frequency of service if two or three lines were extended on campus. Line 1 (Santa Monica Boulevard) currently operates with approximately 10 minutes between buses during daylight hours on weekdays. Lines 8 and 12 operate with 15-minute frequency, while Lines 2 and 3

operate with 20-minute frequency. Thus only 1 line operates at a frequency that is comparable to the existing Campus Express service. Bringing two or three lines into campus might result shorter headways on occasion (because of overlapping schedules), which could increase on-campus traffic congestion. In general, frequency of service would not be improved.

As noted by the comment, the Culver City Line 6 already passes by several existing UCLA student-housing complexes, and thus already provides direct access to campus. As the line currently terminates at Ackerman Union, it is unclear how access to campus could be further improved.

As noted above in Response to Comment 30-13, the comment did not provide any evidence that merging campus express with local public transit lines would result in cost savings. This comment provides no evidence that service would be improved by merging campus express into public transit lines. Therefore, the campus considers this suggestion as infeasible.

Refer also to Topical Response A (BruinGo Program) for a discussion of the BruinGo program and Topical Response B (Hilgard Bus Terminal) for a discussion of the Hilgard Bus Terminal.

Response to Comment 30-15

The comment does not provide any evidence that UCLA's traffic generation has been reduced as a result of the BruinGo pilot program.

Refer also to Topical Response A (BruinGo Program), which clarifies that the 2002 LRDP Draft EIR did not reject BruinGo as a feasible mitigation measure and that the campus has proposed to continue the BruinGo program.

The University has no plans to construct 4,149 parking spaces. As noted in the Draft 2002 LRDP and 2002 LRDP Draft EIR, the University plans to maintain the parking cap established in the 1990 LRDP at 25,169 spaces. As discussed in the 2002 LRDP Draft EIR (Volume 1, page 4.13-89):

Upon the completion of the Westwood Replacement Hospital, the Southwest Campus Housing and Parking, and the Intramural Field Parking Structure projects (which have been previously approved and/or are under construction and would add approximately 3,552 spaces), and the reduction of stack parking to approximately 597 spaces, the inventory would be maintained at or below the 25,169-space limit adopted in the 1990 LRDP. As required by PP 4.13-1(b), the parking space cap would be maintained under the 2002 LRDP.

When the Westwood Replacement Hospital, the Southwest Campus Housing and Parking, and the Intramural Field Parking Structure projects are completed, the supply of on-campus parking would be approximately 24,572 physical spaces, approximately 597 spaces below the parking cap of 25,169 spaces. The 2002 LRDP Draft EIR assumed that stack parking would be continued and would provide up to 597 spaces. The proposed NHIP would include 66 new parking spaces. During the planning

horizon of the 2002 LRDP, the University could propose construction of additional on-campus spaces (to replace stack parking spaces, subject to the parking cap limitation) or additional replacement spaces (if existing physical spaces are removed as a result of construction).

The campus's transportation strategy is discussed in the Draft 2002 LRDP and the 2002 LRDP Draft EIR. As noted in both documents, maintenance of a Transportation Demand Management program and adherence to the vehicle trip and parking space caps established in the 1990 LRDP are the central elements of that strategy.

UNIVERSITY OF CALIFORNIA, LOS ANGELES

UCLA

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3250 PUBLIC POLICY BUILDING
UNIVERSITY OF CALIFORNIA
LOS ANGELES, CALIFORNIA 90095-1656

December 18, 2002

Mr. Curtis Zacuto
Principal Environmental Planner
UCLA Capital Programs
1060 Veteran Avenue
Los Angeles, CA 90095-1365

RE: TRIP GENERATION RATES USED IN THE DRAFT ENVIRONMENTAL IMPACT
REPORT FOR UCLA'S LONG RANGE DEVELOPMENT PLAN

Dear Mr. Zacuto:

I am writing to comment on the trip generation rates used by the Draft Environmental Impact Report for UCLA's 2002 Long Range Development Plan. The EIR states, "current trip generation rates were developed. These rates are based upon current traffic counts from the Fall 2001 Cordon Count study conducted for UCLA and counts conducted during 1999/2000 and 2000/2001 academic years of trips in and out of individual parking structures." (2002 Long Range Development Plan Draft Environmental Impact Report Technical Appendices, p. 44).

31-1

BruinGO was implemented in Fall 2000. Therefore, the trip generation rates used to predict the effects of the LRDP refer to vehicle trips to and from campus *with BruinGO*. Your transportation consultant, Crain and Associates, examined the effects of BruinGO, and Tables 3 and 4 of their report are shown on the following two pages. Table 3 shows that, after BruinGO began, many faculty and staff who live in the Blue Bus service area began riding the bus to campus. Table 4 shows almost no change in transit ridership by faculty and staff who live outside the Blue Bus service area.

31-2

Crain's report is titled "UCLA BRUINGO TRANSIT PROGRAM" and it is available on line at: http://www.transportation.ucla.edu/bruingo/BruinGo_report.pdf. I have examined this report and would like the EIR to address the following questions:

31-3

Table 3

UCLA Employee Commute Mode Choice Summary (in percent)

For the SMMBL Service Area

UCLA Employee Commute Mode	SMMBL Service Area		
	Year: 2000 Prior to BruinGo!	Year: 2001 With BruinGo!	Mode Shift
Bicycled	3.6%	3.3%	-0.3%
2-Carpool	10.0%	7.1%	-2.9%
3-Carpool	2.4%	1.7%	-0.7%
4-Carpool	0.0%	0.1%	0.1%
6-Carpool	0.2%	0.2%	0.0%
Drove Alone	45.7%	41.6%	-4.1%
Motorcycled	0.7%	0.7%	0.0%
Vanpooled	2.7%	0.4%	-2.3%
Rode Bus	8.6%	20.1%	11.5%
Walked/Jogged	26.1%	24.8%	-1.3%
Sub Total:	100.0%	100.0%	0.0%

31-2

Table 4

UCLA Employee Commute Mode Choice Summary (in percent)

For the Non-SMMBL Service Area

UCLA Employee Commute Mode	Non-SMMBL Service Area		
	Year: 2000 Prior to BruinGo!	Year: 2001 With BruinGo!	Mode Shift
Bicycled	0.6%	0.4%	-0.2%
2-Carpool	11.4%	11.4%	0.0%
3-Carpool	2.7%	1.9%	-0.7%
4-Carpool	0.5%	0.2%	-0.2%
6-Carpool	0.2%	0.1%	-0.1%
Drove Alone	68.8%	67.9%	-0.9%
Motorcycled	1.1%	0.5%	-0.6%
Vanpooled	5.3%	6.6%	1.3%
Rode Bus	7.2%	7.6%	0.4%
Walked/Jogged	2.3%	3.3%	1.0%
Sub Total:	100.0%	100.0%	0.0%

31-2

1. Table 3 of the Crain report shows that, within the Blue Bus service area, transit ridership by faculty/staff for commuting to campus increased by 134 percent during BruinGO's first year. (20.1% ÷ 8.6%) 31-4
2. Table 3 shows that, within the Blue Bus service area, 57 percent of *all* faculty/staff transit commuters to campus during BruinGO's first year were *new* transit riders, and that 47 percent of these new transit riders were former solo drivers. (11.5% ÷ 20.1%) and (4.1% ÷ 11.5%) 31-5
3. Table 3 shows that, within the Blue Bus service area, 43 percent of faculty/staff transit commuters to campus during BruinGO's first year would have ridden transit *without* BruinGO, and that 57 percent of them are new transit commuters who began to ride transit after BruinGO began. (8.6% ÷ 20.1%) and (11.5% ÷ 20.1%) 31-6
4. Table 3 shows that, within the Blue Bus service area, solo driving by faculty/staff for commuting to campus decreased by 9 percent during BruinGO's first year. (4.1% ÷ 45.7%) 31-7
5. Table 4 shows that, outside the Blue Bus service area, transit ridership by faculty/staff for commuting to campus increased by only 3 percent during BruinGO's first year. (0.4% ÷ 7.2%) 31-8
6. Table 4 shows that, outside the Blue Bus service area, solo driving by faculty/staff for commuting to campus decreased by only 1 percent during BruinGO's first year. (0.9% ÷ 68.8%) 31-9

Are these interpretations of Tables 3 and 4 in the Crain report correct? 31-10

The contrast between large mode shifts inside the Blue Bus service area and almost no change outside it are striking. Because 35 percent of all UCLA faculty and staff live inside the Blue Bus service, these mode shifts substantially increased total bus ridership to campus. 31-11

The trip generation rates for the LRDP are based on data collected while BruinGO was operating. These trip generation rates are then used to predict the consequences of future development at UCLA. Nevertheless, the EIR also states that continuing BruinGO is not a feasible strategy to mitigate traffic impacts: "*Transit subsidies for faculty and staff have previously been evaluated and have not been recommended because of the limited potential to reduce total parking demand.*" (page 4.13-47). The EIR does not even mention the option of continuing BruinGO for students. 31-12

How can the EIR predict traffic impacts using trip generation rates based on data collected while BruinGO was operating and simultaneously announce that UCLA does not commit to continuing BruinGO? The EIR should either use trip generation rates that predict the traffic impacts in the absence of BruinGO, or commit to continuing BruinGO. 31-13

The data that Crain used to produce Tables 3 and 4 are derived from the highest quality transportation surveys available. I have attached the "Management Commitment Cover Letter" 31-14

that UCLA submitted to the South Coast Air Quality Management District" along with the 2001 survey that Crain used to produce Tables 3 and 4. Surely, no one can doubt that these data are "accurate and verifiable."

I would appreciate your response to the issues raised in this letter. I have also enclosed an evaluation of BruinGO that was conducted by UCLA's Institute of Transportation Studies. I request that this evaluation be included in the Final EIR to show that BruinGO substantially increases transit ridership and reduces vehicle trips. When decisions of the magnitude contemplated in the Long Range Development Plan are made, members of the UCLA and Los Angeles communities should be fully and accurately informed.

Sincerely,

Donald Shoup

cc: Councilman Jack Weiss
Supervisor Zev Yaroslavsky

MANAGEMENT COMMITMENT COVER LETTER

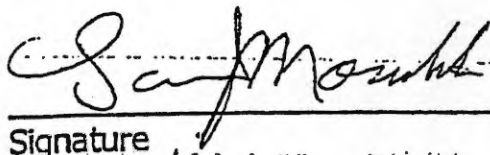
Ms. Carol A. Gomez, Manager
Transportation Programs
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765

RE: University of California, Los Angeles
Company/Worksite Name

Dear Ms. Gomez:

As the highest ranking official at the worksite, or the person responsible for allocating the resources necessary to implement the program, I attest that the attached Annual Analysis has been prepared, in accordance with the provisions of Rule 2202 Employee Commute Reduction Program Guidelines.

All strategies listed in the approved Employee Commute Reduction Program have been and are being offered to employees and all data in the program is accurate and verifiable to the best of my knowledge.



Signature

Sam J. Morabito

Date

(310) 794-6000

Please print or type name

Phone number

Associate Vice Chancellor - Business and Financial Services

Title

BruinGO: An Evaluation

Jeffrey Brown
Daniel Baldwin Hess
Donald Shoup

Institute of Transportation Studies
University of California, Los Angeles
Los Angeles, CA 90095-1656

December 12, 2002

Table of Contents

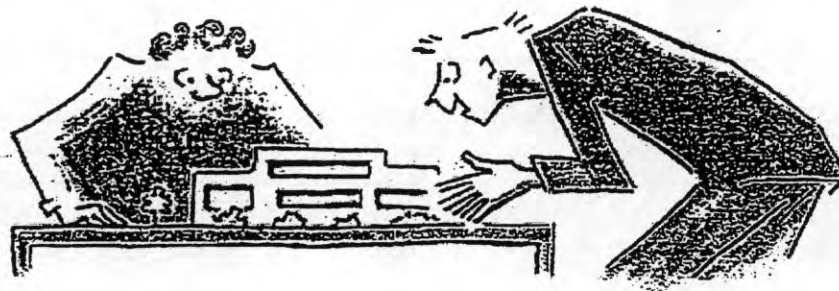
BRUINGO	2
EVALUATION METHODOLOGY	3
HOW DID BRUINGO AFFECT FACULTY/STAFF COMMUTING?	4
HOW DID BRUINGO AFFECT STUDENT COMMUTING?	6
FARE ELASTICITIES	6
HOW DID BRUINGO AFFECT PARKING DEMAND?	8
BRUINGO ALSO SERVES MANY NON-COMMUTE TRIPS	8
MEASURING THE COST AND BENEFITS OF BRUINGO	10
THE COST OF BRUINGO	10
THE BENEFITS OF BRUINGO	10
<i>Reduced fare payments</i>	10
<i>Reduced parking demand</i>	12
<i>External benefits</i>	13
COMPARING THE BENEFITS AND COSTS OF BRUINGO	14
DIFFICULTY IN PREDICTING RIDERSHIP AND COST	14
THREE WAYS TO PAY FOR BRUINGO	15
1. USE SOME RELEASED PARKING SPACES FOR DAILY SALES	16
2. USE BRUINGO TO REPLACE OTHER TRANSPORTATION PROGRAMS	17
3. USE BRUINGO TO REPLACE FUTURE PARKING CONSTRUCTION	18
CONCLUSION	19
APPENDIX: THE COST AND PRICE OF CAMPUS PARKING	20
REFERENCES	23
ENDNOTES	25

BruinGO: An Evaluation

Abstract

Universities and public transit agencies in the United States have together invented an arrangement—called Unlimited Access—that provides fare-free transit service for all students (and, on some campuses, faculty and staff as well). Unlimited Access is not free transit. Instead, it is a new way to pay for transit. The university pays the transit agency for all rides taken by eligible members of the campus community. This paper evaluates the results of the Unlimited Access pilot program that UCLA began in Fall 2000. Bus ridership for commuting to campus increased 56 percent, solo driving decreased 20 percent, and more than 1,000 solo drivers gave up their parking spaces after the program began. The program cost \$1.27 per eligible rider per month, and the benefit-cost ratio was 4 to 1.

CAMPUS ARCHITECTS IN THE 21st CENTURY



"I did it! I had to drop the classroom space and the offices, but this plan has a parking space for every single car they'll bring to campus!"

BruinGO: An Evaluation

Jeffrey Brown, Daniel Baldwin Hess, and Donald Shoup

Despite the increases in federal, state, and local government aid to public transit during the past decade, the share of commuters taking public transit fell from 5.3 percent in 1990 to 4.7 percent in 2000. Transit now serves less than 2 percent of all trips, and passengers occupy only 27 percent of the seats available on public transit buses.¹ At the same time, auto use is increasing, and American motor vehicles now consume one-eighth of the world's total oil production.²

But there is also some good news. A small, but growing, number of transit agencies and universities have joined forces to offer a new program that provides fare-free transit for more than a million people. This program is generically known as Unlimited Access, and it has spread rapidly during the past decade.³ Unlimited Access programs do not provide free transit; instead, they are a new way to pay for transit. The university pays the transit agency, and all eligible members of the university community ride free.

The rapid spread of Unlimited Access suggests that it is meeting a market test: universities are willing to pay for it. Nevertheless, there have been few evaluations of its performance. Michael Williams and Kathleen Petrait (1993) found that when the University of Washington began its fare-free program in 1991, bus ridership by faculty, staff, and students for commuting to campus increased by 57 percent, and solo driving fell by 30 percent. James Meyer and Edward Beimborn (1998) found that when the University of Wisconsin-Milwaukee began its program in 1994, the number of students who commuted to campus by bus increased by 117 percent, and the number who drove alone fell by 24 percent. In his study of transportation on university campuses, James Miller (2001) found that the first-year ridership increases at universities with Unlimited Access programs ranged from 50 percent at the University of Florida to 200 percent at the University of Colorado at Boulder.

This paper evaluates UCLA's Unlimited Access program, called BruinGO (the Bruin is UCLA's mascot), and it builds on our previous survey of the Unlimited Access programs at 35 American universities (Brown, Hess, and Shoup 2001). UCLA's pilot program was designed to evaluate the effects of introducing fare-free transit at UCLA, and it is offered with one of the

three transit agencies that serve UCLA, but not with the other two agencies. This experimental design allows us to compare the travel behavior of the faculty, staff, and students who live inside the area served by BruinGO, and those who live outside it, both before and after BruinGO began.

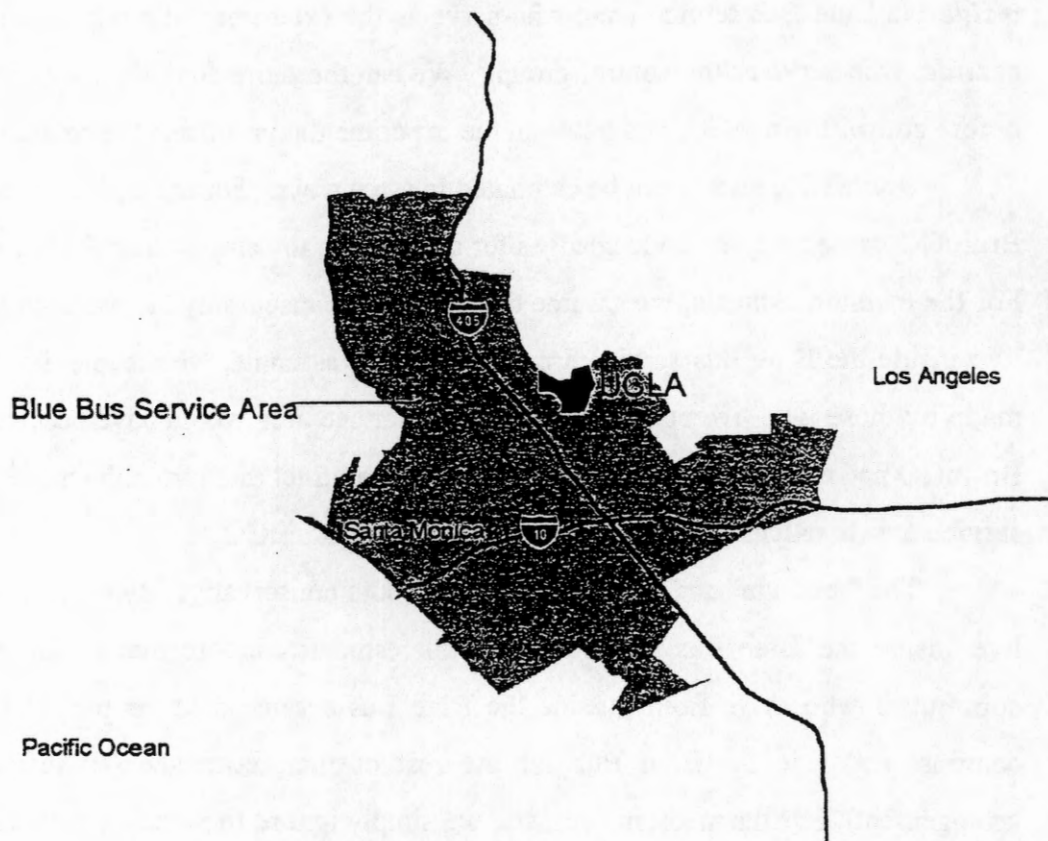
BRUINGO

UCLA is located on the west side of Los Angeles. Three major transit agencies serve the campus, but BruinGO includes only the Santa Monica Municipal Bus Lines (the Blue Bus), which serves all of Santa Monica and much of West Los Angeles (see Map). Five of the Blue Bus's 13 lines come directly to UCLA. Students, staff, and faculty swipe their university ID card through an electronic reader when they board any Blue Bus, and the university pays the fare of 45¢ per ride. The total fare payment for the eight-month pilot program (October 2000 to June 2001) was \$640,000 for 62,700 eligible riders (36,900 students, and 26,800 staff and faculty), or \$1.27 per person per month.⁴

[Map]

BruinGO ridership during the pilot program was 1.4 million rides, or 6 percent of the 23 million rides made on the Blue Bus in 2000. Because fare-free transit was offered to only a small percentage of all Blue Bus riders, overcrowding did not become a problem. This sets BruinGO apart from traditional proposals to make transit free for *all* riders. If a transit agency offers free rides to everyone, total ridership can increase substantially. Beyond the resulting overcrowding, the agency loses all its existing fare revenue from current riders, and receives no revenue from the new riders. With BruinGO, the Blue Bus continues to receive all the revenue from its current riders *and* gains additional revenue from the new riders. From the transit agency's point of view, the main effect of BruinGO is that UCLA pays the fares for its own riders, so the transit agency loses nothing from the program.

Because BruinGO includes only the Blue Bus, it is a natural experiment. UCLA faculty, staff, and students who live *outside* the Blue Bus service area are not offered an equivalent program, and they therefore serve as a control group for our analysis. We can estimate BruinGO's effects on travel choices by comparing the commuting behavior of those who live *inside* and *outside* the Blue Bus service area. For our analysis, we define the Blue Bus service area as all of the zip codes that include a Blue Bus route to UCLA.⁵ About 35 percent of all faculty and staff, and 46 percent of students, live inside the Blue Bus service area.



Blue Bus Service Area

EVALUATION METHODOLOGY

UCLA conducted transportation surveys of employees (faculty and staff) and of students before BruinGO began, and again after it had operated for six months. The total number of respondents was 4,565 faculty, staff, and students in 2000, and 3,614 in 2001. Because the respondents provided their addresses, they can be divided into two sub-groups: (1) those who live *inside* the Blue Bus service area, who serve as the experimental group, and (2) those who live *outside*, who serve as the control group.⁶ We can therefore compare the commute mode shares before and with BruinGO, and between the experimental group and the control group.

BruinGO's effects can be estimated in three ways. For the high estimate, we assume that BruinGO caused all the mode changes for commuting to campus after the Blue Bus became free. For the medium estimate, we assume that BruinGO caused only the mode changes by those who live inside the Blue Bus service area. For the low estimate, we assume that the mode changes made by those who live outside the Blue Bus service area would have occurred inside it even if BruinGO had not been in place, and we therefore subtract them from the mode changes inside the service area to calculate the changes caused only by BruinGO.

The "medium" and "low" estimates are both conservative. By focusing only on those who live inside the Blue Bus service area, both estimates ignore mode changes made by those commuters who drive from outside the Blue Bus service area for part of their trip, park off campus, and ride the Blue Bus for the rest of their commute (an informal park-and-ride arrangement). For the medium estimate, we simply ignore these new riders who live outside the Blue Bus service area. For the low estimate, we penalize BruinGO for the new "outside" Blue Bus riders by subtracting them from the medium estimate.⁷

Three estimates of BruinGO's effects on commute mode shares		
<u>High</u>	<u>Medium</u>	<u>Low</u>
BruinGO caused all mode share changes	BruinGO caused all mode share changes inside the BB service area	BruinGO caused all mode share changes inside the BB service area, less what occurred outside

Some of these new "outside" riders, however, were riding the Blue Bus. A survey of BruinGO commuters found that 20 percent of them park on the street near a bus stop, and then take the Blue Bus the rest of the way to campus.⁸ The survey also found that 16 percent of BruinGO commuters live outside the Blue Bus service area.⁹ For our low estimate of BruinGO's

effects we thus include 16 percent of Blue Bus riders in the control group (those who live outside the Blue Bus service area), and therefore subtract some new riders from the test group (those who live inside the Blue Bus service area) when we should be adding them. Our low estimate of BruinGO's effects is therefore extremely conservative.

UCLA set three goals for BruinGO: (1) increase bus ridership to campus, (2) reduce vehicle trips to campus, and (3) reduce parking demand on campus.¹⁰ We examine whether BruinGO met these goals for two groups: employees (faculty and staff) and students.

HOW DID BRUINGO AFFECT FACULTY/STAFF COMMUTING?

Southern California has the worst air quality in the nation, and as part of its air quality management plan the South Coast Air Quality Management District (SCAQMD) requires employers of 250 or more employees to reduce their employees' vehicle commuting to work. To fulfill this requirement, employers conduct annual surveys of their commute choices, and report the results in a standard format, similar to an income-tax return.¹¹ We can use these surveys to examine how BruinGO changed faculty/staff commuting behavior.

Figure 1 shows the recent history of faculty/staff bus ridership. Between 1995 and 2000, the bus share for faculty/staff commuting declined in every year but one, and it fell from 9.2 percent in 1995 to 7.6 percent in 2000. In contrast, the share of *all* faculty and staff (both inside and outside the Blue Bus service area) who commute by bus jumped from 7.6 percent in 2000 to 13.1 percent in 2001—a 73-percent increase in just one year.¹²

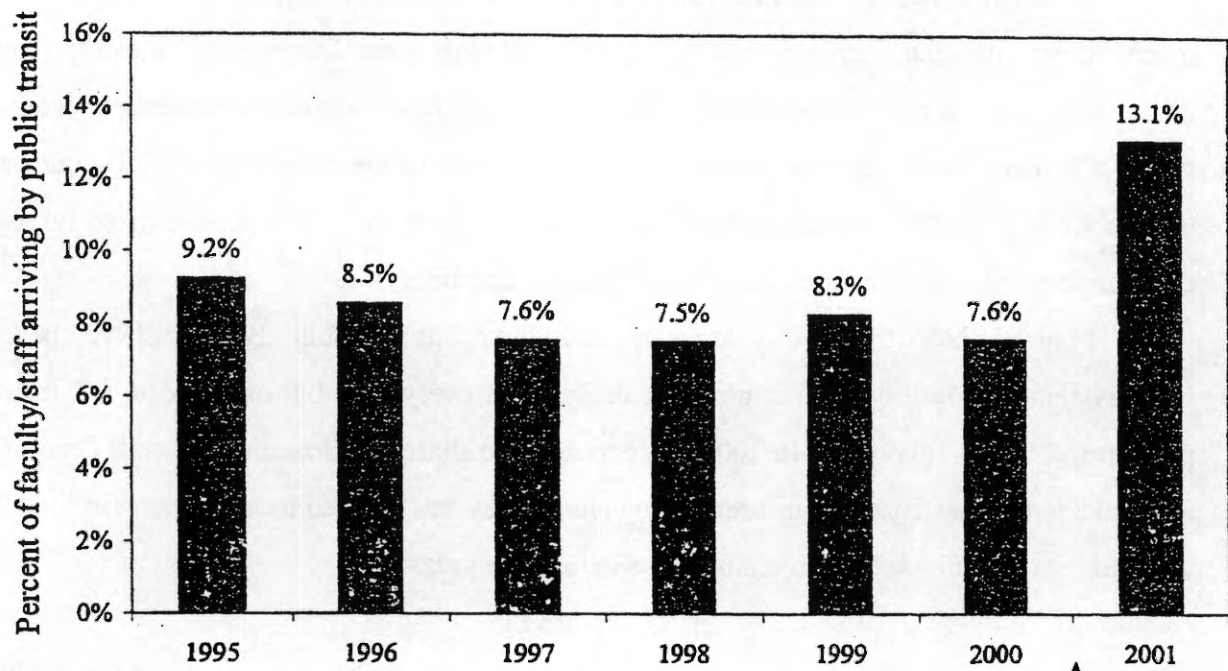
[Figure 1]

Do regional factors (such as gasoline prices) explain the large increase in bus ridership to UCLA between 2000 and 2001? Bus ridership was relatively unchanged at four nearby universities, while it increased substantially at UCLA (see Figure 2).¹³ The decline in bus ridership at Santa Monica College, a 29,000-student community college also located in the Blue Bus service area, is particularly striking. These comparisons suggest that BruinGO caused the large increase in bus ridership at UCLA.

[Figure 2]

Because the bus share for commuting to UCLA increased by 5.5 percentage points between 2000 and 2001, and because 21,149 employees reported to work during the survey period in 2001, there were about 1,163 new bus riders to campus in 2001 ($21,149 \times 5.5\%$). This

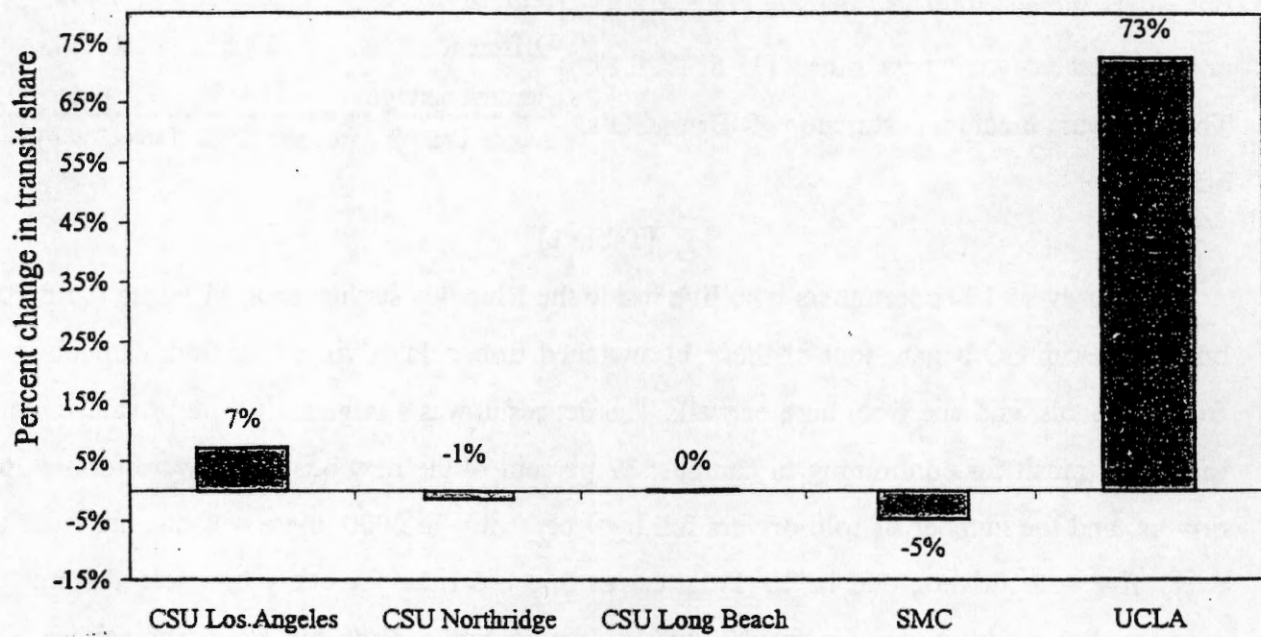
FIGURE 1. Share of faculty and staff commuting by bus
(1995 - 2001)



Source: UCLA Transportation Services (1995-2001). Employee Commute Reduction Program Plans submitted to the South Coast Air Quality Management District.

BruinGO
begins

FIGURE 2. Change in faculty/staff transit share at five universities in Southern California (2000 to 2001)



Source: Employee Commute Reduction Program Plans submitted by each university to the South Coast Air Quality Management District.

is the high estimate of BruinGO's effects: it attributes all of the bus ridership increase to BruinGO. Some commuters who live outside the service area park off campus and take the Blue Bus the rest of the way, but ridership to campus on non-Blue-Bus lines may also have increased. To be conservative, we will not consider this high estimate further. For the medium and low estimates of BruinGO's effects, we will examine only the increase in ridership *inside* the Blue Bus service area.

For UCLA faculty/staff commuters who live *inside* the Blue Bus service area, the bus mode share rose from 8.6 percent to 20.1 percent (see Table 1). The total number of faculty/staff bus riders increased by 134 percent ($11.5 \div 8.6$), and 57 percent were new riders ($11.5 \div 20.1$). This is our medium estimate of BruinGO's effects.

	Faculty/staff bus share for commuting	
	<i>Blue Bus Service Area</i>	
	<i>Inside</i>	<i>Outside</i>
<i>Before BruinGO</i>	8.6%	7.2%
<i>With BruinGO</i>	20.1%	7.6%
Difference	11.5%	0.4%
Percent change	134%	6%

Source: Crain & Associates (2002, Tables 3 & 4)

[Table 1]

For every 100 commuters who live inside the Blue Bus service area, 11 began to ride the bus after BruinGO began; four of these 11 switched from solo driving, four from carpools, two from vanpools, and one from bike or walk. The net result was a large shift from private vehicles to public transit for commuting to campus: 37 percent of the new bus riders were former solo drivers, and the number of solo drivers fell by 9 percent. In 2000, there was one bus rider for every five solo drivers, and in 2001 there was one bus rider for every two solo drivers. In contrast, the mode shares for faculty and staff who live *outside* the Blue Bus service area remained within 1 percentage point of their 2000 values. This suggests that BruinGO caused almost all of the mode changes that occurred inside the Blue Bus service area.

Perhaps some of these mode changes inside the Blue Bus service area would have occurred without BruinGO. Mode shares for those who live outside the Blue Bus service area changed slightly, and we can subtract these "outside" changes to develop a low estimate of the "inside" changes caused by BruinGO. Doing so produces our low estimate that BruinGO increased faculty/staff bus ridership by 128 percent, and reduced solo driving by 8 percent.¹⁴

Table 1. Effects of BruinGO on commute mode shares

	<i>Outside Blue Bus Service Area</i>				<i>Inside Blue Bus Service Area</i>				
	Before	With		Percent	Before	With		Percent change	
Mode	BruinGO	BruinGO	Difference	change	BruinGO	BruinGO	Difference	Medium estimate	Low estimate
<i>Faculty and staff</i>									
Bus	7%	8%	0%	6%	9%	20%	12%	134%	128%
Drive alone	69%	68%	-1%	-1%	46%	42%	-4%	-9%	-8%
Carpool	15%	14%	-1%	-8%	13%	9%	-4%	-28%	-20%
Vanpool	5%	7%	1%	25%	3%	0%	-2%	-85%	-100%
Bike	1%	0%	0%	-33%	4%	3%	0%	-8%	25%
Walk	2%	3%	1%	43%	26%	25%	-1%	-5%	-48%
<i>Students</i>									
Bus	11%	14%	3%	30%	17%	24%	7%	43%	13%
Drive alone	64%	59%	-5%	-8%	17%	12%	-6%	-33%	-26%
Carpool	15%	11%	-4%	-24%	5%	4%	-1%	-16%	9%
Bike	1%	1%	0%	43%	5%	3%	-2%	-42%	-85%
Walk	4%	5%	2%	38%	43%	45%	1%	3%	-35%

Sources: The data are taken from the Spring 2000 and Spring 2001 Student Transportation and Employee Commute Reduction Program Plan surveys conducted by UCLA Transportation Services.

HOW DID BRUINGO AFFECT STUDENT COMMUTING?

UCLA Transportation Services surveyed students about their commuting choices in May 2000 (before BruinGO began) and again in May 2001, after BruinGO had operated for seven months. We can compare the results to estimate how BruinGO changed students' commuting behavior. The bus share for students who live inside the Blue Bus service area rose from 17 percent to 24 percent, while the drive-alone share fell from 17 percent to 12 percent. For every 100 students who live inside the Blue Bus service area, seven began to ride the bus and two began to walk; five switched from solo driving, two from bicycles, and one from carpools. The net result was a shift from private vehicles to public transit and walking. In 2001, 29 percent of student bus riders were new riders, and 71 percent of these new riders were former solo drivers. The number of student bus riders increased 43 percent, and the number of solo drivers fell 33 percent.¹⁵ This is our medium estimate of BruinGO's effects. In 2000 there was one bus rider for every solo driver, and in 2001 there were two bus riders for every solo driver within the Blue Bus service area.

Some of the mode changes by students who live inside the Blue Bus service area might have occurred without BruinGO. The mode shares for students who live outside the Blue Bus service area also changed, and we subtract these "outside" changes from the "inside" changes to develop a low estimate equivalent to our low estimate for faculty and staff. Bus ridership increased 13 percent, and solo driving declined 26 percent (see Table 1).¹⁶ Our low estimate is therefore that BruinGO increased student bus ridership inside the Blue Bus service area by 13 percent, and reduced student solo driving by 26 percent.

FARE ELASTICITIES

The large increases in bus ridership and decreases in solo driving during BruinGO's first year are consistent with the results at other universities that offer Unlimited Access programs. For example, consider what happened at the University of Washington, which is very similar to UCLA in its urban location, size, and range of functions. When the university began its U-Pass program in 1991, the number of commuters who rode the bus to campus increased by 57 percent, and the number who drove alone fell by 30 percent.¹⁷

We can use the ridership increases at UCLA to estimate the fare elasticity of demand for transit commuting. Among those who live *inside* the Blue Bus service area, the fare elasticity of

transit demand is between -0.67 and -0.64 for faculty and staff, and between -0.22 and -0.07 for students.¹⁸ The lower initial bus share for faculty/staff commuters before BruinGO began—only 9 percent—may help explain their higher fare elasticity.

The number of drive-alone trips to campus decreased by between 8 and 9 percent for faculty and staff, and by between 26 and 33 percent for students (see Table 2). We can use these data to calculate the cross-elasticity between the fare for public transit and the number of drive-alone trips to campus. The cross-elasticity is between $+0.04$ and $+0.5$ for faculty and staff, and between $+0.13$ and $+0.17$ for students.¹⁹ These values may seem low, but they lead to large absolute decreases in the number of drive-alone trips because both the fare reduction and the initial number of vehicle trips are large. Reducing the transit fare to zero increased bus ridership by at least 33 percent, and reduced drive-alone trips by at least 16 percent.²⁰

[Table 2]

These results are for BruinGO's first year. During its second year (2001–2002), BruinGO ridership increased an additional 27 percent.²¹ This large second-year ridership increase echoes the experiences at other universities with Unlimited Access programs. For example, UC Davis experienced average transit ridership increases of 10 percent per year during the decade following the creation of its program in 1990 (Brown, Hess, and Shoup 2001). Three factors associated with Unlimited Access programs explain these long-term ridership increases.

First, because ridership increases, the transit agencies receive more revenue, and they can improve their service to campus. The more convenient and reliable service then attracts more riders than would be expected from the fare reduction alone. The added demand and fare revenue created by BruinGO allowed the Blue Bus to schedule 16 new buses on two of its lines to campus, while the new riders on the three other lines were carried with the existing capacity. With the added service, 304 scheduled Blue Buses arrive at UCLA every weekday.²²

Second, because BruinGO provides everyone with a transit pass, more people have an incentive to learn where buses can take them. Most travelers know little about the modes they do not use, but as they become more familiar with the transit system, they begin to use it for trips they previously believed it would not serve.

Third, and perhaps most important over the long term, students adjust their housing choices to take advantage of fare-free transit. Advertisements for student apartments now often

Table 2. Effects of BruinGO on commuting from inside the
Blue Bus service area

	<i>Medium estimate</i>		<i>Low estimate</i>	
	<u>% change</u>	<u>Number</u>	<u>% change</u>	<u>Number</u>
Faculty/staff bus riders	+134%	+854	+128%	+818
Student bus riders	+43%	+1,248	+13%	+384
Total bus riders	+56%	+2,102	+33%	+1,202
Faculty/staff solo drivers	-9%	-304	-8%	-260
Student solo drivers	-33%	-992	-26%	-760
Total solo drivers	-20%	-1,296	-16%	-1,020

emphasize "Blue Bus accessibility" as a selling point. As the share of students with easy access to public transit grows, ridership continues to increase.

In summary, the ridership increases associated with Unlimited Access programs not one-shot occurrences, but rather the beginning of a long-term trend. BruinGO has fundamentally shifted the way many UCLA students, staff, and faculty view public transportation.

HOW DID BRUINGO AFFECT PARKING DEMAND?

Before BruinGO began, 3,400 faculty and staff, and 3,000 students drove to campus alone from within the Blue Bus service area. With BruinGO, 3,100 faculty and staff, and 2,000 students drove to campus alone. Therefore, more than 1,000 solo drivers gave up their parking spaces after BruinGO began (see Table 2). These spaces do not remain vacant, of course, because UCLA can sell them to daily visitors or to students on the wait list for a parking permit.

UCLA's wait list for student permits confirms that BruinGO reduced campus parking demand. Students who apply for but do not receive a parking permit are put on a wait list, and UCLA considers the list an indicator of the "unmet need" for campus parking. The wait list declined from 3,969 students in Fall Quarter 1999 (before BruinGO began) to 2,637 students in Fall Quarter 2000 (during BruinGO's first year). Therefore 1,332 students left the parking wait list after BruinGO began. Some of these students may have received a permit given up by a new bus rider, and others may have decided not to apply for a permit because of BruinGO.

BRUINGO ALSO SERVES MANY NON-COMMUTE TRIPS

Our evaluation has focused on commute trips, but students, staff, and faculty also use BruinGO for many non-commute trips. For example, staff and faculty ride the Blue Bus to off-campus worksites, an option that is especially useful for the many vanpool commuters who do not have a car available during the day. Even for those who do have cars available, riding the bus saves the time for parking and unparking at both ends of a trip, and this can make the bus faster than driving for short trips. As part of the pilot program evaluation, UCLA Transportation Services requested comments on BruinGO from the university community. More than 2,500 students, staff, and faculty responded, and we can look at their own words to see why they ride the Blue Bus for university business trips.²³

My job requires a lot of travel around campus and Westwood in general. Since the BruinGO program started, my job has been made easier.

When I travel between offices, taking the Blue Bus for free saves my time and UCLA's time.

I use the Blue Bus for meetings in the Wilshire Center at least 3 days a week. BruinGO saves a lot of time since I don't have to find parking and also saves UCLA money because I don't need validation. Not to mention the Wilshire traffic!!

Students also use BruinGO for many non-commute trips. Students report that they ride free to the Getty Museum, their internships, volunteer work, the beach, or anywhere else they want to go. Whole classes take the bus to museums or public meetings. Again, comments sent to UCLA Transportation Services explain how BruinGO gives students access to many valuable social, educational, and job opportunities in Los Angeles.

I am more likely to attend cultural events, concerts, and club meetings since I know that transportation will be so easy. BruinGO allows me to get much more out of my education besides simply taking classes.

I feel like the whole city is laid out before me. I use my Bruin Card to go to my internship at Loyola Marymount University.

As a teaching assistant, I believe that expanding learning outside the classroom (to museums) has always been a worthwhile experience. Now, with BruinGO, it is a great deal easier for students to expand their horizons beyond campus and Westwood.

As an international student at UCLA, I have found it extremely reassuring and welcoming to be able to negotiate the landscape of Los Angeles with the help of BruinGO. I arrived in LA without a car, and BruinGO facilitated the process of getting to know the city and the UCLA campus.

These comments by students, staff, and faculty show that BruinGO does much more than change the way they commute to campus. It helps students become more engaged with the city, and it helps staff and faculty to be more productive in their work.

MEASURING THE COST AND BENEFITS OF BRUINGO

BruinGO increased transit ridership, reduced solo driving, and caused more than 1,000 solo drivers to give up their parking spaces. Are these benefits sufficient to justify BruinGO's cost?

Some costs and benefits of BruinGO accrue to the university, some to the transit agency, and some to society as a whole. We have estimated the costs and benefits of BruinGO from the perspective of the campus community, because this is the population being asked to decide whether or not to continue the program.²⁴ We allocated the costs and benefits among four groups within the campus community: students, faculty and staff, university departments, and campus visitors.

The cost of BruinGO

BruinGO is funded entirely from parking revenue, which is derived from both daily parking fees and the sale of monthly parking permits. Of the total parking revenue, students pay 17 percent, faculty and staff pay 25 percent, university departments pay 4 percent (for university guests), and campus visitors pay 54 percent.²⁵ We multiply these percentages times BruinGO's \$810,000 total cost to allocate this cost, and the top panel of Table 3 shows the distribution.²⁶

[Table 3]

The benefits of BruinGO

BruinGO provides many benefits to the campus community, but some are difficult to quantify. For example, BruinGO helps the university recruit and retain employees and students, and it enhances the educational experience of students by providing access to local educational and cultural sites. BruinGO also provides two benefits that we *can* quantify: reduced fare payments for riders, and reduced parking demand.

Reduced fare payments

BruinGO subsidizes individual riders, not the Blue Bus. The university pays the Blue Bus for each BruinGO ride, but students, staff, and faculty receive all the money.²⁷ Riders do not reach into their own pocket to pay the fare when they board the bus, but into the university's pocket. For those who were riding the bus before BruinGO began, the fare payment is a transfer payment to students, staff, and faculty, because it replaces expenditures they would have made

Table 3. Measured annual costs and benefits of BruinGO

Distribution of costs						
Costs	Students	Faculty and staff	University depts.	Campus visitors	Total	Share
BruinGO rides	\$108,800	\$160,000	\$25,600	\$345,600	\$640,000	79%
BruinGO administration	\$28,900	\$42,500	\$6,800	\$91,800	\$170,000	21%
Total cost	\$137,700	\$202,500	\$32,400	\$437,400	\$810,000	100%
Percent of total cost	17%	25%	4%	54%	100%	
Distribution of benefits						
Benefits	Students	Faculty and staff	University depts.	Campus visitors	Total	Share
Reduced fare payments	\$399,000	\$125,000			\$524,000	16%
Reduced parking demand	\$463,000	\$682,000	\$109,000	\$1,472,000	\$2,726,000	84%
Total benefits	\$862,000	\$807,000	\$109,000	\$1,472,000	\$3,250,000	100%
Percent of total benefits	27%	25%	3%	45%	100%	
Comparing the benefits and costs						
Benefit-cost measure	Students	Faculty and staff	University depts.	Campus visitors	Total	
Net benefits (benefits – costs)	\$724,000	\$605,000	\$77,000	\$1,035,000	\$2,440,000	
Benefit/cost ratio	6.3	4.0	3.4	3.4	4.0	

without the program. These existing riders made 909,000 rides using BruinGO, and we valued their fare reduction benefit at 45¢ per ride.²⁸ The riders' benefit for the existing rides is thus \$409,000 (909,000 rides x 45¢ per ride). For the new bus rides induced by BruinGO, the value to the riders is presumably less than 45¢ a ride, because they were unwilling to pay the fare before the program began. If we assume that the demand curve is linear (as shown in Figure 3), the value to riders is the area under the demand curve (the consumer surplus) for the 512,000 new rides, and the average value (to the rider) per ride is one-half the fare payment, or 22.5¢ per ride. The total value of the new rides is therefore \$115,000 (512,000 rides x 22.5¢ per ride).²⁹ The combined fare reduction benefit, or increase in consumer surplus, for the existing and new riders is worth \$524,000 (\$409,000 + \$115,000). Because students made 73 percent of the BruinGO rides, while faculty and staff made 27 percent, we allocate 73 percent of the fare reduction benefit to students, and 27 percent to faculty and staff.

[Figure 3]

Because we count UCLA's fare payment to the Blue Bus as a cost, we must also count the fare savings for UCLA's riders as a benefit. Most of the university's spending for BruinGO becomes direct financial aid for students or a tax-exempt fringe benefit for staff and faculty. Students sent many comments to UCLA Transportation Services describing this benefit.

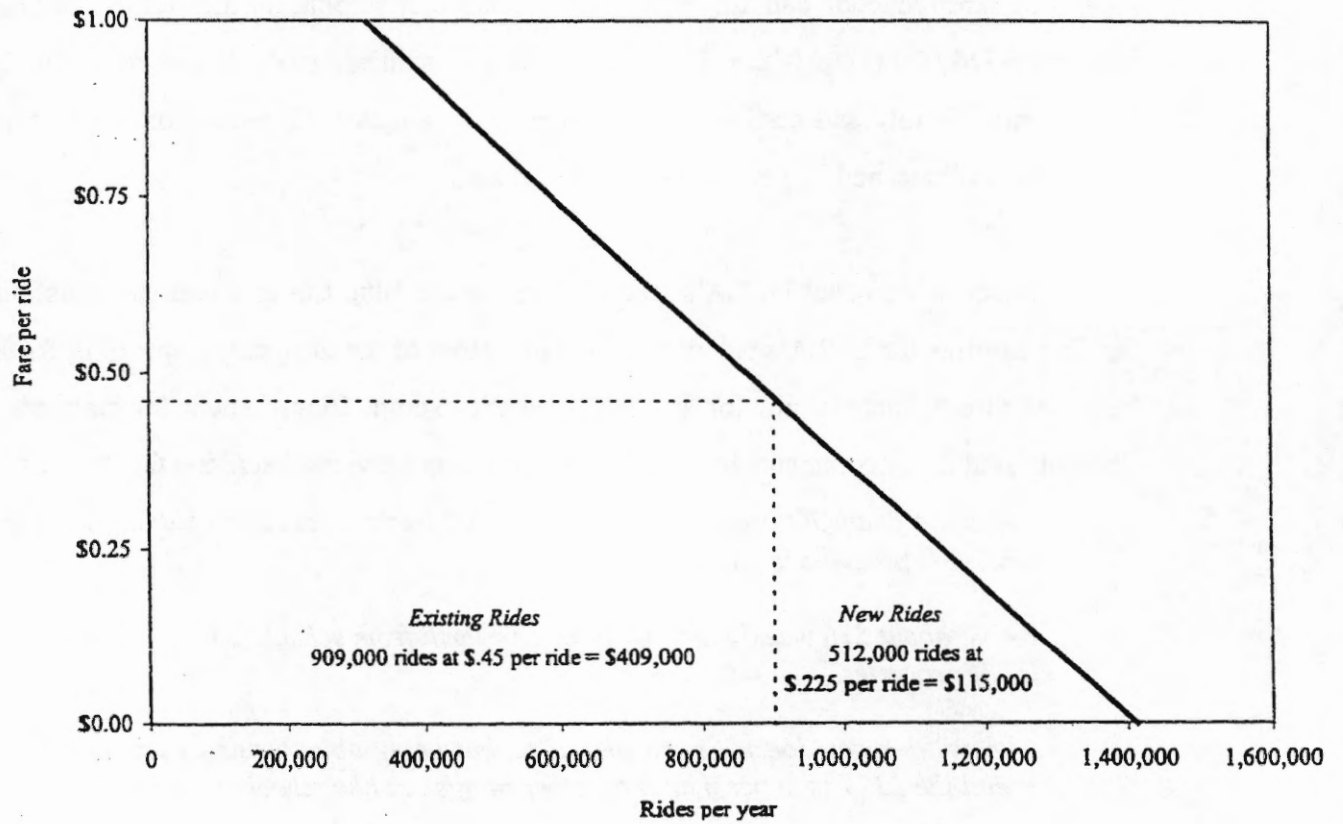
I love the BruinGO program. I have like 700 bucks total . . . no kidding, and the BruinGO program is like my lifeline.

I save about \$10 weekly, getting back and forth from school. \$40 a month buys a lot of groceries.

I know \$1 a day doesn't seem like a lot, but being able to ride free means I can spend the \$25 I save per month on other things . . . like schoolbooks.

A survey of student BruinGO riders in April 2002 found that 76 percent of them received financial aid from the university, so their fare subsidy increases their financial aid packages.³⁰ Some riders also save far more than their bus fares. The survey found that 56 percent of riders own a car. When asked why they did not drive to campus, most of them said that they did not receive a parking permit or that a permit costs too much, but several volunteered that another person in the household had the car. One said: "BruinGO is our second car." If BruinGO convinces a family that they can live with only one car, the money saved by forgoing a second car

FIGURE 3. Benefit of fare savings for BruinGO riders



can amount to several thousand dollars a year for fuel, maintenance, insurance, parking, and other ownership costs avoided.

Reduced parking demand

BruinGO riders save money, but they are also led, as if by an invisible hand, to promote another goal: reduce parking demand. Paying the fare for a bus rider to campus costs far less than building a parking space on campus, so avoiding the expense of new parking spaces is one of BruinGO's major benefits. BruinGO allows the university to satisfy parking demand with a smaller parking supply.

More than 1,000 former solo drivers who began to ride the bus after BruinGO began vacated the parking spaces they previously occupied, and these spaces are made available to new users. For these new users, the parking spaces vacated by former solo drivers are perfect substitutes for newly constructed spaces. We can therefore value the benefit of reducing parking demand by comparing it with the cost of increasing the parking supply. A new 1,500-space parking structure being built on campus will cost \$47.3 million, or \$31,500 per space.³¹ Because UCLA is willing to pay \$31,500 per new parking space, we can use this figure to represent value to UCLA of making another space available. BruinGO "buys back" parking spaces from existing users, as opposed to building new spaces. BruinGO reduced the demand for parking by at least 1,020 spaces (see Table 2). At a value of \$31,500 per space, this reduction in parking demand is worth \$32.1 million (1,020 spaces x \$31,500 per space).

The debt service of \$2,414 per space per year for the capital borrowed to finance the parking structure shows the annual value of the one-time capital cost of a new parking space. When the operating cost is added, the annual capital and operating cost per new parking space is \$2,673 per year (or \$223 per month).³² At this rate, the annual cost of 1,020 new parking spaces is \$2.7 million (1,020 spaces x \$2,673 per space). Because UCLA is willing to pay \$2.7 million per year to increase the campus parking supply by 1,020 new parking spaces, we assume that reducing campus parking demand by 1,020 spaces is also worth \$2.7 million per year. And because UCLA increases parking fees to finance new campus parking spaces, we allocate the avoided cost of new spaces in proportion to the sources of campus parking revenue (see Table 3).

Even those who pay for parking receive a net benefit from BruinGO because it avoids the high cost of increasing the parking supply. Drivers enjoy the financial benefit of reduced parking

demand in the form of lower parking fees. This benefit is worth \$2.7 million, while BruinGO cost \$810,000. Therefore, the benefit-cost ratio for drivers who pay to park is 3.4 to 1 ($\$2.7 \text{ million} \div \$810,000$). Because BruinGO is financed entirely by parking fees, drivers pay for bus riders, but *both* drivers and bus riders are better off.

Many students, staff, and faculty members wrote to UCLA Transportation Services to report that BruinGO reduced their demand for parking:

I LOVE the BruinGO system. I gave up my parking permit because of it.

Because of BruinGO, I have mothballed my car and take the bus to school every day, so BruinGO has been a tremendous benefit to me (and has stopped me from applying for a parking permit).

I never plan to apply for a parking permit again.

New drivers who were formerly wait-listed for a parking permit, and campus visitors who are able to find a parking space more easily, are unlikely to write to Transportation Services about BruinGO, but they also benefit from the spaces vacated by former solo drivers.

By reducing the demand for parking, the university avoids building new parking structures on campus, makes parking more affordable and available for those who must commute to campus by car, and can use the land that might have been devoted to new parking for other purposes. By encouraging some students, staff, and faculty to give up their spaces, BruinGO also makes more parking available for campus visitors, allows more members of the Los Angeles community to take advantage of the campus's cultural and educational resources, and helps counter UCLA's image as an ivory tower with parking as its moat.

External benefits...

Beyond its direct benefits to UCLA, BruinGO also produces benefits to all of Los Angeles. By diverting trips from cars to public transportation, BruinGO reduces vehicle trips and vehicle emissions. This is an important byproduct of fare-free transit, because Los Angeles has the worst traffic congestion and air pollution in the US. We have not attempted to put a dollar value on the social benefits of reduced traffic congestion and air pollution, but we can suggest their magnitude by comparing BruinGO with the alternative strategy of building new parking structures. The Environmental Impact Report (EIR) for UCLA's new 1,500-space, \$47-million parking structure shows that it will generate 1.5 million additional vehicle trips to and from UCLA every year. A parking structure does not, by itself, generate vehicle trips; rather, where

there is a shortage of parking, a new parking structure will enable more vehicle trips. According to the EIR, these additional vehicle trips will exhaust 87 tons of carbon dioxide, 9 tons of nitrogen oxide, 14 tons of reactive organic gases, and 7 tons of particulates into the region's air every year.³³ By reducing the demand for vehicle trips, BruinGO can create substantial environmental benefits for the entire region.

Comparing the benefits and costs of BruinGO

We can now compare the measured benefits and costs of BruinGO. BruinGO's benefit/cost ratio exceeds 1.0 for every group considered. The students' exceptionally high benefit/cost ratio of 6.3 to 1 helps explain the many enthusiastic comments that students have sent to UCLA Transportation Services about BruinGO:

BruinGO is one of the smartest things UCLA has done in years. With this program, I feel UCLA is finally showing it cares for students.

I am a first year graduate student and I do not have the words to adequately describe how wonderful it is to have a free transportation system available to me.

BruinGO makes me feel proud to be a Bruin.

The bottom panel of Table 3 shows that BruinGO's measured benefits are \$3.3 million a year (for fare savings and reduced parking demand), and its costs are \$810,000 a year (for fare payments and administration). Even when the unmeasured benefits are neglected, the net benefit is \$2.4 million a year, and the overall benefit/cost ratio is 4 to 1.

DIFFICULTY IN PREDICTING RIDERSHIP AND COST

The pilot program for BruinGO proved to be a success. But because Unlimited Access is a novel concept, many people have difficulty understanding how it will work, and predicting the ridership and cost is difficult. We can show this difficulty by comparing the predictions made before BruinGO began with the results observed during the pilot program in 2000-2001 (see Table 4).

(Table 4)

In 1998, UCLA hired a transportation consultant to predict the ridership and cost of a transit-pass program for faculty and staff. The consultant predicted that fare-free transit for faculty and staff would cost \$170,000 per month (exclusive of administrative costs). BruinGO's

Table 4. Predicted and realized results of a transit-pass program
for faculty and staff

	Consultant prediction	BruinGO result	Result as % of prediction
	(1)	(2)	(3)=(2)/(1)
Fare subsidy (\$ per month)	\$170,000	\$19,200	11%
Transit ridership increase (riders per day)	315	818	260%
Reduction in parking demand (spaces per day)	150	260	173%

Source: Consultant's predictions are from Crain & Associates (1998). Results are taken from the low estimates discussed earlier.

actual cost for faculty and staff amounted to only \$19,200 per month in 2000-2001, or 11 percent of the predicted cost.³⁴

Why did the consultant overestimate BruinGO's cost? The main reason seems to be a misunderstanding of how a university transit-pass program works. The consultant assumed that UCLA would buy a regular transit pass (at a cost of \$42 per month) for all employees who do not have a UCLA parking permit. The consultant also assumed that most employees who receive these transit passes would not use them. This misunderstanding helps to explain why the consultant overestimated BruinGO's actual cost by 885 percent. Although BruinGO gives free transit to everyone at UCLA (not just to those without a parking permit), it costs 89 percent less than the consultant predicted.³⁵

The consultant also predicted that fare-free transit would attract only 315 new faculty/staff riders, but BruinGO attracted at least 800 new riders, or more than 260 percent of what was predicted.³⁶ What explains this error? The consultant assumed that the fare elasticity of demand for transit ridership would be only -0.18 , which is extremely low. In reality, the fare elasticity for faculty and staff turned out to be between -0.67 and -0.64 , more than three times greater.³⁷ The consultant also used the *point* elasticity rather than the *arc* elasticity that economists recommend for predicting the effects of large fare changes (in this case a 100-percent reduction); this arithmetic error reduced the predicted ridership by another 50 percent.

These difficulties in predicting the effects of BruinGO show the value of UCLA's decision to offer a pilot program. UCLA, the Big Blue Bus, and the riders themselves could not fully understand how a transit-pass program works without the actual trial run. BruinGO's high ridership and low cost are a welcome departure from many transportation investments that attract fewer riders and cost more than consultants predict.

THREE WAYS TO PAY FOR BRUINGO

The pilot program shows that BruinGO is worth doing, but if it is to continue, UCLA must find a permanent way to pay for it. Here are three suggested ways to pay for BruinGO: (1) use some of the released permit parking spaces for daily sales; (2) use BruinGO to replace more expensive transportation programs; or (3) use the savings from avoided new parking construction.

1. Use some released parking spaces for daily sales

BruinGO reduced at least 1,000 solo-driver trips a day for commuting to campus, and therefore made at least 1,000 parking spaces available for other drivers. Even commuters with parking permits occasionally rode the bus: among permit holders who live within the Blue Bus service area, 19 percent reported that they used BruinGO, and that they rode the bus to campus an average of two days a week.³⁸ Because BruinGO releases parking spaces occupied by former solo drivers who shift to the Blue Bus, making these spaces available for meters and daily sales is an appropriate way to finance BruinGO. There is a chronic shortage of parking spaces available to daily users, and the spaces released by BruinGO would not have been available to new users without BruinGO. The additional daily-sales revenue can therefore be used to pay for BruinGO.

Although UCLA now allocates only 10 percent of its parking spaces to meters and daily sales, the meters and daily sales earn about 50 percent of total parking revenue of \$30 million a year. This occurs because visitors pay \$2 per hour or \$7 per day for parking on campus, but most students, staff, and faculty pay only \$54 per month for permits.³⁹ UCLA can therefore pay at least part of the cost for BruinGO by using the reduction in commuter parking demand to increase the number of spaces available for meters and daily sales. One solo driver who pays \$7 for parking on campus will finance seven round trips to campus by bus riders (at 90¢ per trip). And because the daily sales revenue was \$14.8 million in FY 2001-2002, an increase of only 5 percent would yield \$740,000 a year, which is more than UCLA's total fare payments of \$640,000 during BruinGO's first year.

The UCLA Parking Service estimates that each daily-sales parking space generates \$1,200 per year more than a permit space.⁴⁰ If only half the 1,000 spaces released by commuters who shifted from solo driving to transit were used for daily sales rather than permits, they would generate an additional \$600,000 a year. Beyond paying for BruinGO, increasing the number of spaces available for visitors will enable the university to welcome more people to its museums, libraries, concerts, lectures, plays, conferences, and athletic events. Students, staff, and faculty who regularly commute by bus will also find it easier to pay for parking on campus on days when they need their cars.

2. Use BruinGO to replace the on-campus shuttle buses

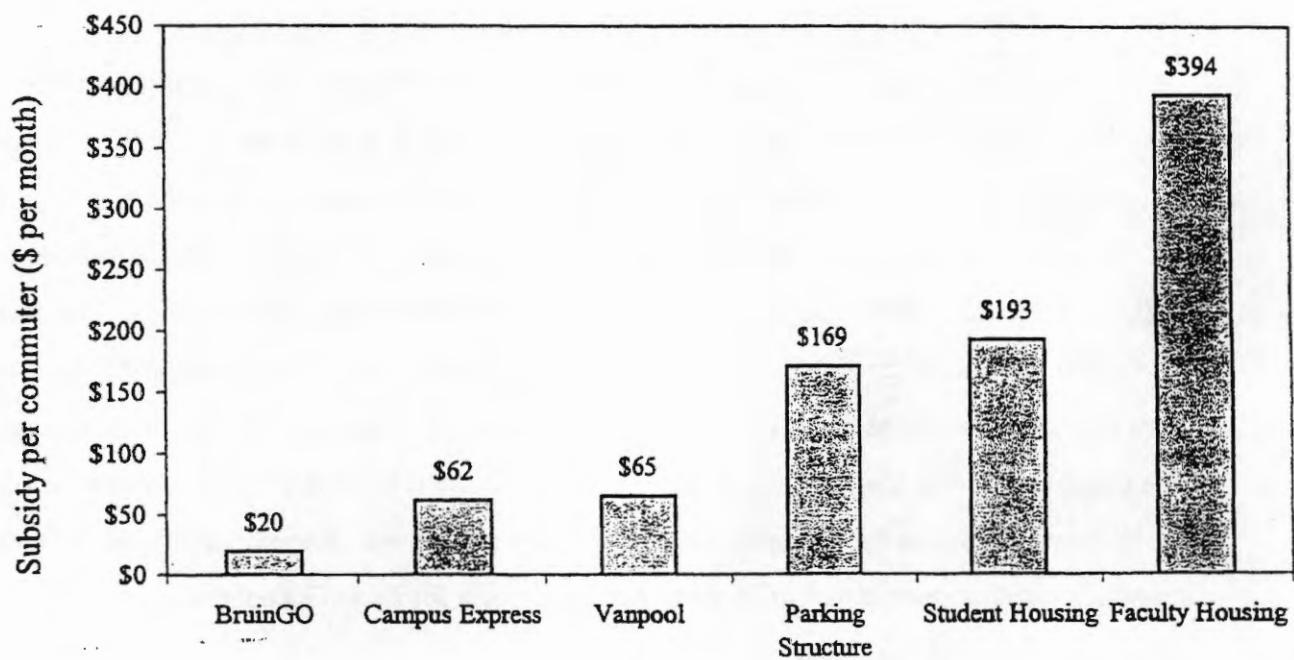
UCLA can also shift money from other campus transportation programs to pay for BruinGO. UCLA funds five campus transportation programs in addition to BruinGO: the on-campus shuttle (Campus Express), vanpools, two shuttles to off-campus housing, and, of course, the construction of new parking spaces. UCLA pays less than \$20 a month for each commuter who rides the Blue Bus to campus every day. The monthly costs for commuters who use the other transportation programs every day are much higher: \$62 per rider for the Campus Express, \$65 per rider for the vanpool program, \$169 per driver for new parking spaces, and more than \$193 per rider for the off-campus housing shuttles (see Figure 4).⁴¹ BruinGO is surprisingly cheap when compared with other campus transportation programs.

[Figure 4]

In FY 2000-2001, UCLA paid the Blue Bus \$640,000 to carry 1.4 million BruinGO riders to and from campus (45¢ per trip), while it paid \$1.9 million to transport 1.3 million riders for much shorter trips on the Campus Express (\$1.41 per trip). Because it is a public transit agency, the Blue Bus receives federal, state, and local operating subsidies; the Campus Express does not qualify as a public transit agency, and therefore does not receive any subsidy. The lack of government subsidies for the Campus Express helps explain why a short shuttle trip on campus costs UCLA almost three times more than a public transit trip from all the way home to campus. The Campus Express also has a high cost per trip because it often runs empty during vacations. UCLA pays to operate the Campus Express whether people ride it or not, and pays for parking structures whether people park in them or not, but it pays for BruinGO only when students, staff, and faculty board the Blue Bus.

In his survey of transportation on university campuses, James Miller (2001, 16) reports that some universities have merged their campus shuttles with the local public transit systems to take advantage of the government subsidies that are available only for public transit. If UCLA merges its shuttle service into BruinGO, it would save the \$1.9 million a year it now spends for the Campus Express. The Blue Bus could reroute two or three of its five lines that now stop at the edge of campus, and bring them on campus to follow the Campus Express routes. One Blue Bus line and one Culver City (Green Bus) line to UCLA already duplicate the Westwood Village-to-Ackerman Union route, so including the Green Bus in BruinGO could replace that

FIGURE 4. BruinGO compared with other transportation programs
(subsidy per commuter per month)



Source: Transportation Services Advisory Board (1999).

route. Because most on-campus rides would be very short, and would occupy otherwise empty seats, the transit agencies could charge a low fare compared with UCLA's cost of \$1.41 per ride on the Campus Express.

Campus Express Map

Merging the shuttle system with BruinGO will also provide better on-campus transit service. The Campus Express shuts down in the evening and on weekends and holidays, but the Blue Bus and the Green Bus operate in the evening and on weekends and holidays, so riders will enjoy more frequent service with extended hours. This strategy will also improve BruinGO itself, because bus riders could travel directly to the center of campus, rather than only to the edge of campus. Because the Culver City Bus line to campus passes several off-campus student housing complexes, including it in BruinGO will also improve many students' access to campus.

The savings from eliminating UCLA's own shuttle service will be more than enough to pay for BruinGO, and to expand the program to include the Green Bus. The total cost of BruinGO will increase because of the payments for all the on-campus shuttle rides, but each ride shifted from the existing shuttle service to BruinGO will save 96¢ (\$1.41 for the Campus Express but only 45¢ for BruinGO). For the current 1.3 million shuttle rides per year, the savings will be \$1.25 million per year, which should be enough to pay the full cost of the expanded BruinGO program.⁴²

3. Use BruinGO to replace future parking construction

UCLA paid the Blue Bus \$71,000 per month for student, staff, and faculty rides, and BruinGO reduced daily parking demand by at least 1,000 spaces. Therefore BruinGO costs \$71 per month to reduce parking demand by one space ($\$71,000 \div 1,000$ spaces). The cost of a parking space in the new IM Field parking structure is \$223 per space per month (see Table 4), so BruinGO's cost is only 32 percent of the annualized cost of building a new parking space.⁴³

One reason for BruinGO's low cost in comparison with a new parking structure is that UCLA pays for BruinGO only when riders use it. Ridership falls sharply at night, on weekends, and during holidays and vacations, so UCLA pays almost nothing at those times. In contrast, UCLA pays for parking structures 24 hours a day, 365 days a year, even when they are empty. A parking structure is completely filled for only a few hours each weekday, and the high cost of substantial unused off-peak capacity drives up the average cost per user.

Because the parking supply is fixed in the short run, the spaces freed by BruinGO are released to provide additional permits for students or daily sales to visitors. In the long run, however, BruinGO can substitute for new construction. UCLA plans to build 2,368 spaces in three new structures over the next decade at a cost of \$55 million. Because BruinGO is cheaper than new parking spaces, it can be paid for with the money saved by building fewer or smaller parking structures.

CONCLUSION

The substantial mode shifts caused by BruinGO refute the common assumption that fare-free transit cannot entice commuters from their cars. Among UCLA faculty and staff who live in the Blue Bus service area, transit ridership for commuting to campus increased by 134 percent, and solo driving fell by 9 percent. Among students, bus ridership increased by 43 percent, and solo driving fell by 33 percent. Because these results were achieved in a city famous for its addiction to cars, they suggest that Unlimited Access programs would also work at many other universities. About 60 universities now offer fare-free transit, and their programs cover only 6 percent of the 14 million students enrolled in US universities, so the opportunity for growth in transit ridership is enormous.

The startling 134-percent increase in UCLA employees' transit ridership after BruinGO began has significant implications for the broader concept of fare-free transit programs offered by employers. These programs (often referred to as Eco Pass programs) allow any employer located within a transit agency's service area to purchase fare-free transit for all its employees at a bulk rate. Only six US transit agencies (Dallas, Denver, Portland, Salt Lake City, San Jose, Seattle) now offer Eco Pass programs, and the potential market for employer-based programs is much greater than for university-based programs. The large increase in transit ridership at UCLA shows that fare-free public transit for employees and students is a promising innovation with great potential.

APPENDIX: THE COST AND PRICE OF CAMPUS PARKING

Inefficient pricing causes UCLA's parking shortage. The price of parking is the same for all spaces on campus, regardless of their location or the time of day. Prices are set not to manage the supply efficiently, but only to cover the total cost of the parking system, and the resulting problems shouldn't surprise us. The demand for parking exceeds the supply during peak hours, and students who cannot obtain a permit place themselves on the wait list. The UCLA Transportation Service views this wait list as a measure of "unmet need," and responds by building new parking structures.

Because the price of a parking permit is far below the marginal cost of new parking spaces, drivers who park in a new structure pay only a small fraction of its cost. UCLA's newest 1,500-space parking structure costs \$31,500 per space, or \$223 per space per month, while the price of a permit to park in it is only \$52 per month (see Table 4). UCLA makes up the difference by raising the price of all parking on campus. Because the marginal cost of adding to the parking supply is so far above the average cost for the system, every addition to the parking supply drives up this average cost. Every time a new parking structure comes on line, the price of all permits jumps (see Figure 7). New structures open and permit prices increase, yet the shortage persists. Even after spending \$330 million (in 2002\$) to construct 18,000 parking spaces during the last 40 years, UCLA has not found a way to provide a parking space for every student who is willing to pay the system's average cost for a permit.

[Figure 7]

Given the current pricing system, UCLA will never have enough parking spaces, because the problem is not a shortage of spaces. Instead, the problem is the way UCLA charges for parking. Only two universities in the US have more parking spaces than UCLA. Ohio State University has 25,000 spaces, and the University of Florida has 24,000 spaces. Both are large campuses in towns with relatively low land values, while UCLA, with 21,000 spaces, is a much smaller campus in West Los Angeles, which has among the highest land values on earth. If UCLA reaches the parking cap of 25,169 parking spaces adopted in its Long Range Development Plan, it will have more parking spaces than any other campus in the country. But constructing expensive new parking spaces and undercharging for them is like feeding pigeons: the more spaces you build, the more cars will come to fill them, and there will always be a shortage.

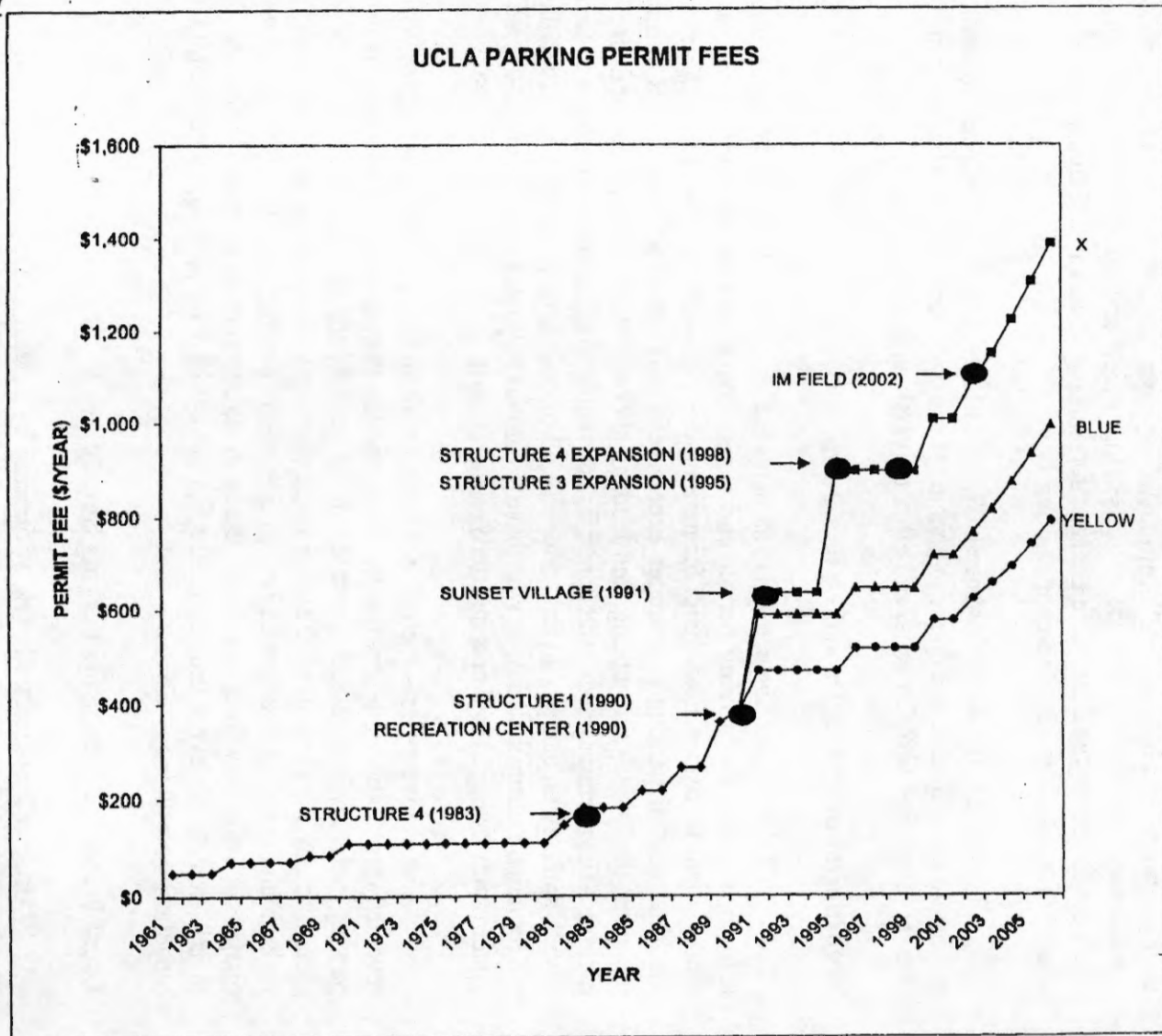
Instead of reaching for its parking cap, UCLA should reach for its thinking cap. The solution is *not* to charge \$223 a month—the marginal cost of a new parking space—for a permit to park on campus. Nor is the solution to build more parking structures. A more promising approach is to change the way the university allocates parking to students. Currently, UCLA uses a "need based" point system to allocate parking permits. Points are awarded for commuting distance to campus, and students with the highest number of points (longest commutes) are given the best parking spaces. Unfortunately, the "need-based" point system encourages students to falsify information on their parking applications to make their commutes seem longer and thus to "earn" a desired parking space. Students are led to believe that the only way to get parking at UCLA is to cheat the system, and this is notoriously easy to do. Students who live close to campus report their parents' addresses in Long

UCLA PARKING PERMIT FEES (\$/YEAR)

UCLA PARKING PERMIT FEES (\$/YEAR)

PERMIT TYPE

YEAR	ALL	X	BLUE	YELLOW
1961	\$50			
1962	\$50			
1963	\$50			
1964	\$72			
1965	\$72			
1966	\$72			
1967	\$72			
1968	\$84			
1969	\$84			
1970	\$108			
1971	\$108			
1972	\$108			
1973	\$108			
1974	\$108			
1975	\$108			
1976	\$108			
1977	\$108			
1978	\$108			
1979	\$108			
1980	\$108			
1981	\$144			
1982	\$180			
1983	\$180			
1984	\$180			
1985	\$216			
1986	\$216			
1987	\$264			
1988	\$264			
1989	\$360			
1990	\$384			
1991		\$636	\$588	\$468
1992		\$636	\$588	\$468
1993		\$636	\$588	\$468
1994		\$636	\$588	\$468
1995		\$900	\$588	\$468
1996		\$900	\$648	\$516
1997		\$900	\$648	\$516
1998		\$900	\$648	\$516
1999		\$900	\$648	\$516
2000		\$1,008	\$720	\$576
2001		\$1,008	\$720	\$576
2002		\$1,092	\$768	\$624
2003		\$1,152	\$816	\$660
2004		\$1,224	\$876	\$696
2005		\$1,308	\$936	\$744
2006		\$1,392	\$996	\$792



Beach or Anaheim as their own addresses, and they automatically get parking. Apart from the serious ethical problems this "need-based" system creates, it also creates serious economic inefficiency. The wait list for parking is used to justify the construction of additional parking spaces that cost far more than the price charged for parking in them, and many of the new spaces are allocated to students who live near campus.

Is there a better way to manage UCLA's parking supply—a lower cost alternative that is fair, economically efficient, and does not encourage the cheating that many believe runs rampant in the current point system? There is, and other universities already use it.

Transportation Prices Turned Upside Down

UCLA sells parking permits to students either for the quarter or the year. Students thus pay a fixed cost for the parking permit and a zero marginal cost for parking on each trip. This arrangement increases the demand for parking once students have bought their permits. The zero marginal cost of parking encourages excessive use of scarce parking spaces during peak hours, increases the "need" for parking, and leads to shortages that generate demands for more campus parking. The permit system is designed for conventional commuters who come to campus five days a week and stay on campus all day. Students who come to campus only on certain days, or who do not remain on campus all day, or who drive to campus only occasionally, are ill-served by the permit system with its high fixed cost and zero marginal cost.

Some universities—such as the University of Oregon and the University of Wisconsin—have reversed this relationship between the fixed and the marginal costs of parking by using in-vehicle parking meters (which resemble debit cards) to pay for parking. Students can use in-vehicle parking meters to pay for parking by the hour in all parking structures and lots (see box). They pay for parking on every trip, and they pay only for the exact parking time they use—no more, no less. This marginal-cost-but-no-fixed-cost arrangement gives everyone an incentive to consider the alternatives to solo driving for every trip. Students can always save on parking by carpooling, riding transit, bicycling, or walking.

Using Prices to Manage the Parking Supply

BruinGO has reduced parking demand by at least 1,000 campus spaces, and the IM Field Parking Structure will increase the parking supply by 1,500 spaces in Fall 2002. Rather than allocate all of the new spaces to students on the wait list for permits, we can price more parking spaces by the hour, and use the revenue to fund BruinGO. But if we make additional spaces available for hourly parking, what price should be charged for them? Prices should be set not to recover a fixed cost, but to match demand with the available supply. This means charging "market-clearing" prices for parking. Everyone who already has a parking permit can keep it at the current price, but we can charge flexible prices for the vacancies that BruinGO makes available.

What is the “right” price for parking? It is the price that balances the demand for parking—which varies over time—with the fixed supply of spaces. If prices are just high enough to keep a few curb spaces vacant at every location, drivers can always find a vacant space near their destination. The right price may be high or low, but there won’t be a shortage of parking spaces, or an excess supply. The purpose of charging the right price for parking is to ration a scarce resource, *not* to finance the cost of providing it. Public agencies often price at cost regardless of the market, but parking should be priced at market regardless of cost.

If the goal of right pricing is to achieve a vacancy rate that allows drivers to park anywhere, what is this vacancy rate? Traffic engineers usually recommend that at least 15 percent of spaces should remain vacant to ensure easy access and egress. The cushion of vacant spaces eliminates the need to search for a place to park. If we accept this recommendation, the right price for parking should vary through the day to produce a stable vacancy rate of about 15 percent. When the price is *not* right, too many spaces will be empty (the price is too high), or shortages will appear (the price is too low).

Figure 12-1 illustrates this “market-clearing” price for parking (the price at which demand equals supply). The supply of spaces at any site is fixed, so a vertical line positioned at the 85-percent occupancy rate represents the supply of spaces available with a 15-percent vacancy rate. The demand curve for parking slopes downward, and the point where this demand curve intersects the vertical supply curve shows the price that will clear the market for spaces. For example, when demand is high (demand curve D_1), a price of 60¢ an hour produces a 15-percent vacancy rate. When demand is moderate (demand curve D_2), a price of 20¢ an hour produces a 15-percent vacancy rate. When demand is low (demand curve D_3), the vacancy rate is 50 percent even with free parking, so the right price of parking is zero.

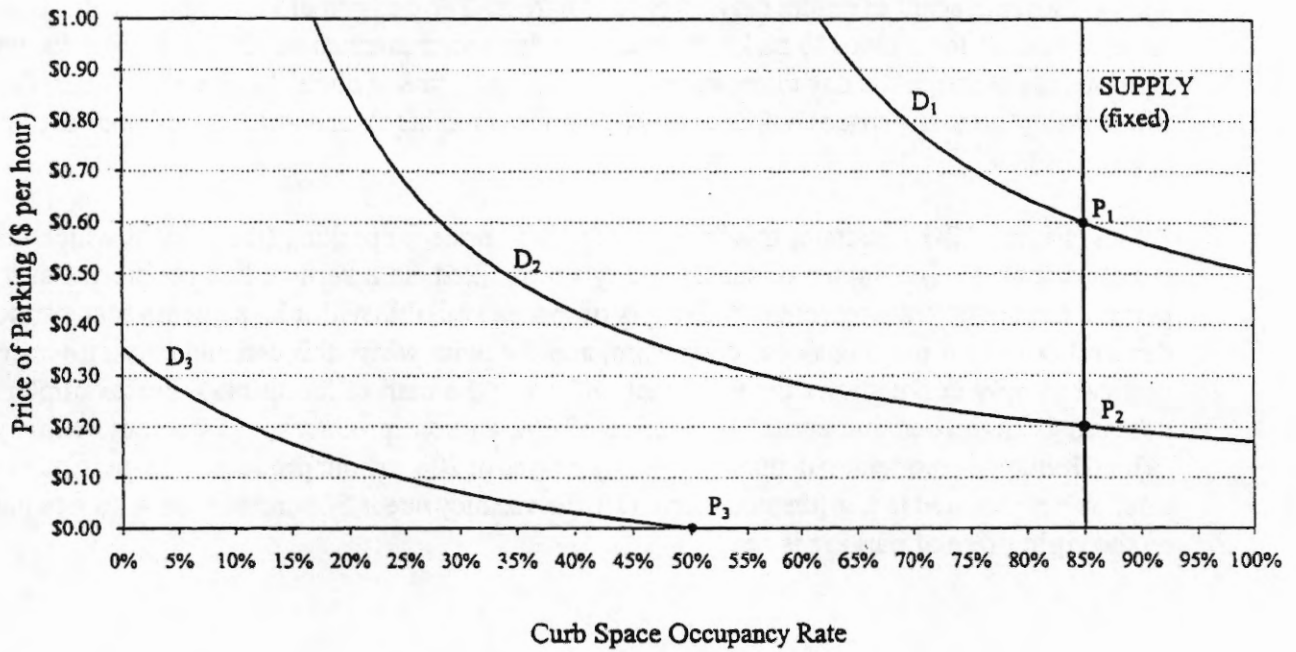
Figure 12-1

We can rely on prices alone to maintain a few vacancies and to create turnover. The parking supply is fixed, but demand rises and falls during the day, so demand-responsive parking prices will necessarily rise and fall to maintain the desired vacancy rate. If the price is too low, overcrowding results. If the price is too high, many spaces remain vacant and a valuable resource is underused. Obviously, prices can’t constantly fluctuate to maintain a vacancy rate of *exactly* 15 percent, but they can vary sufficiently to avoid chronic overcrowding or underuse.

A variable price for parking may seem impractical at first, but the price of most commercial parking varies by time of day and day of the week. Parking lot operators instinctively raise prices when their occupancy rates approach 100 percent, and some operators claim they don’t own a “full” sign because they never need one. To set the prices for on-street parking, UCLA could use the traditional four-step process that commercial operators use to set prices for off-street parking:

1. Look to see if your lot is full or empty.
2. Then check your competition.

FIGURE 12-1
THE MARKET PRICE OF CURB PARKING



3. If you are full and they are empty, raise your price.
4. If you are empty and they are full, lower your price.

Campus parking should *not* be priced like a private parking lot, however, because commercial operators aim to maximize private profits, not social benefits. Nevertheless, this example does show that we can vary the price of parking to create vacancies. The purpose of "right-priced" parking is *not* to gouge drivers or to maximize revenue. Instead, *the right price of parking is the lowest price that will avoid shortages.*

The price of campus parking for those who pay by the hour should vary according to (1) location on campus, (2) time of day, (3) day of the week, and (4) time of year. The price of parking for those using in-vehicle meters should be set to clear the market for the number of spaces made available to these users in each structure. That is, the price of parking should be set to match the quantity demanded with the available supply, at each location and time. Prices should be lower in the less convenient locations and at off-peak hours. Parking could even be free on weekends and during vacations when there is excess capacity even at a zero price, and this would encourage travel to campus during uncrowded times.

Parking spaces priced by the hour can be introduced as a demonstration project, perhaps for a small sample of students, staff, and faculty who choose not to buy a conventional permit. Offering a few hundred market-priced spaces on an hourly basis will show how the new option works, and if the users prefer them to monthly permits, the option can be expanded incrementally to meet the demands of other non-permit holders. The results of the demonstration project can be carefully evaluated before proceeding to more widespread adoption.

Advantages of a Market-Priced Parking Program

1. All students will be able to obtain parking at UCLA, while only one out of six students now obtains a permit under the point system.
2. By encouraging more rapid turnover of the better-located parking spaces, the existing parking supply can serve more students.
3. All students will be treated the same. The Parking Service will not judge whether a student "needs" parking.
4. Low-income students can be allocated financial aid to help them with their transportation needs. The existing need-based "point" system gives no preference to low income students.
5. Students will pay only for the exact parking time they use—no more or no less. Charging only for the parking time actually used on each trip will give everyone an incentive to consider alternatives to solo driving for every trip to campus. Students will always save money by carpooling, by parking in a peripheral location, or by riding transit, bicycling, or walking. Under the point system, once a student has paid the fixed cost of a parking permit, the marginal cost of parking is free for every trip to campus, and this leads to overuse.
6. Students will have more flexibility. Students can pay extra to park in the more central spaces on days when they are in a hurry. On days when they have time to space they can save

money by parking in the peripheral spaces. All students can park in the more convenient locations at off-peak times. Moreover, students want flexibility in parking location because their specific destinations on campus can change from day to day. With the point system, students are assigned a permanent parking location that they must use for every trip to campus.

7. Students will tend to choose the higher-priced central campus spaces on days when they want to park for only a short time, and the cheap peripheral spaces on days when they want to park for a long time. Under the point system, students must park in the same location every day, regardless of how long or how short a time they want to park on different days. Students who want to spend only a short time on campus—such as a quick trip to the library—will not have to spend a long time walking from their “assigned” parking space to their final destinations. The faster turnover of the most convenient central parking spaces will make them available to more students.
8. Areas where high parking demand leads to high parking prices will signal where new parking spaces should be made available to students. This will create a dynamic, self-correcting parking system that shows when and where new parking spaces should be built.
9. Lower off-peak prices will draw people to campus during the summer, in the evenings, and on weekends when the university has empty parking spaces waiting to be used. The result will help to make UCLA a 12-month-a-year institution.
10. Students with disabilities can be offered transportation allowances to park in the best-located spaces, enhancing their access to the campus and their overall mobility.
11. Highly-recruited students can be offered transportation allowances to be used for parking on campus or for any other purpose. By rewarding academic excellence, the transportation allowance can further the academic mission of the university.
12. In-vehicle parking meters are already effective in managing the parking supply at other universities.
13. Any additional revenue raised by the metered-parking program can be used to provide new transportation services for students, *including BruinGO*.

In conclusion, right pricing should be considered as a practical and theoretically appealing alternative to the current point system for allocating parking spaces to students, staff, and faculty who do not buy monthly permits. In-vehicle parking meters will allow a market to match parking supply with parking demand. Flexible prices will introduce fairness, efficiency, and honesty into the parking space allocation process.

In combination, in-vehicle meters for parking *and* BruinGO for transit will change the price of travel to campus in two important ways. First, the meters will shift the price of parking to a marginal cost with no fixed cost. Second, BruinGO shifts the price of transit to a fixed cost with no marginal cost. These price reforms will make it cheaper for students to drive to campus when they carpool, or intend to stay for only a short time, and will encourage students to ride the bus when they want to stay on campus all day. In-vehicle meters for parking *and* BruinGO for transit will together have a much greater impact on travel behavior than will either one acting alone. In combination, they will turn transportation prices upside-down.

Endnotes

1. The transit mode share data come from the 1990 and 2000 US census, available at <http://www.census.gov>. We calculated the average bus occupancy using data from the National Transit Database. In 2000, transit patrons traveled 18.8 billion passenger miles by bus, and transit agencies provided 1.7 billion vehicle revenue miles of service. Dividing the 18.8 billion passenger miles by the 1.7 billion vehicle revenue miles gives an average bus occupancy of 10.7 passenger miles per bus mile ($18.8 \div 1.7 = 10.7$). Dividing the average bus occupancy of 10.7 passengers by the average bus capacity of 40 seats gives an average bus occupancy of 27 percent ($10.7 \div 40 = 27$ percent). See Federal Transit Administration (2001).
2. Transportation accounted for 66.4 percent of US oil consumption in 1996, and highway transportation accounted for 78.3 percent of US oil consumption for transportation. Therefore, highway transportation accounted for 52 percent of US oil consumption ($66.4\% \times 78.3\%$). The US also consumed 25.7 percent of the world's oil production in 1996. Therefore, highway transportation in the US consumed 13.4 percent (slightly more than an eighth) of the world's total oil production ($52\% \times 25.7\%$). Highway transportation refers to travel by cars, trucks, motorcycles, and buses. See Stacy Davis (2000, Tables 1.3, 2.10, and 2.7) for the data on energy consumption in the US.
3. Universities have given their programs a variety of names—such as BruinGO, ClassPass, SuperTicket, and UPass. We refer to these programs collectively as Unlimited Access. See Brown, Hess, and Shoup (2001) for a survey of 35 Unlimited Access programs. There were more than sixty programs by 2002.
4. BruinGO was launched as an eight-month pilot program. UCLA paid \$640,000 for student, staff, and faculty rides, and spent an additional \$170,000 in administrative and marketing expenses, for a total cost of \$810,000. BruinGO is funded entirely from parking revenue, which is derived from both daily parking fees and the sale of monthly parking permits. UCLA and the Blue Bus renewed the program for the 2001-2002 and 2002-2003 school years.
5. The Blue Bus service area is defined as the zip codes that include the five Blue Bus lines that serve UCLA: 90024, 90025, 90034, 90035, 90049, 90064, 90066, 90291, 90401, 90402, 90403, 90404, and 90405. Crain and Associates (2002, 21) report that 7,424 of the 21,149 employees (35%) surveyed in 2001 live inside the Blue Bus service area. Boyd et al. (2002) report that 17,102 of the 36,084 students (44%) live inside the Blue Bus service area.
6. Crain and Associates (2002, Tables 3 and 4) report the separated results for faculty and staff, while Boyd et al (2002) report the results for students.
7. The medium and low estimates are also conservative because, over time, people may relocate their residences to take advantage of BruinGO. Students are often new to the

community, and they move often, so they can easily adjust their housing locations in response to the free public transit.

8. Santa Monica Municipal Bus Lines (2002, Table 5-1). The sample size was 763 BruinGO riders.

9. Santa Monica Municipal Bus Lines (2002, Table 3-1). Some commuters who live inside the Blue Bus service area probably park and ride because, although they live in a zip code served by the Blue Bus, they do not live within walking distance of a bus stop.

10. UCLA Transportation Services Advisory Board (1999) reports BruinGO's goals.

11. The SCAQMD requires employers of 250 or more employees to conduct employee travel surveys during the four-hour peak-arrival period of 6 a.m. to 10 a.m. from Monday to Friday. UCLA had 27,644 employees who reported to work between 6 a.m. and 10 a.m. in 2001, and 77 percent of them, or 21,419 employees, commuted to campus on an average day. The text of the SCAQMD's regulation is available online at <http://www.aqmd.gov/trans/doc/rule/index.html>.

12. The share of UCLA employees who commute by public transit rose from 7.6 percent in 2000 to 13.1 percent in 2001, a 5.5 percentage-point increase. The number of daily transit trips increased from 1,625 before BruinGO (2000) to 2,805 with BruinGO (2001), an increase of 1,180 daily transit trips. This is a 73-percent increase in transit ridership in one year. Campus parking fees increased by 11 percent in July 2000, and this may have contributed to the increase in transit ridership to campus in 2001. But the prices of campus parking permits also increased by between 22 and 66 percent in 1991, while transit ridership fell by 1 percent the following year. And the prices for permits increased by 10 percent in 1995, while transit ridership fell by 7 percent in the next year. Therefore, the 11-percent increase in parking fees in 2000 is unlikely to have caused the 73-percent increase in transit ridership in 2001.

13. The four universities are: California State University, Los Angeles; California State University, Northridge; California State University, Long Beach; and Santa Monica College.

14. An example shows how we calculated the low estimate. Consider the case of faculty/staff bus ridership. The employee survey shows there were 638 faculty/staff bus riders before BruinGO, and 1,492 with BruinGO, an increase of 854 riders, or 134 percent. There was a 6 percent increase in faculty/staff bus riders *outside* the Blue Bus service area. We might expect that bus ridership *inside* the Blue Bus service area would have increased 6 percent without BruinGO; this would have resulted in approximately 35 new bus riders ($638 \times 6\% = 35$). Thus, we assume that BruinGO is responsible for 818 new riders ($854 - 35 = 818$), or a 128 percent increase in bus ridership ($818 \div 638$). By contrast, the high estimate discussed earlier showed that overall bus ridership to campus increased by 1,163 new riders in 2001.

15. Parking permit holders also use BruinGO. UCLA Transportation Services surveyed a random sample of 2,473 parking permit holders during February 2002 to learn about their

BruinGO use. The survey found that 9.6 percent of all parking permit holders used BruinGO for commuting to or from campus during the previous week, and they used BruinGO for an average of 4.0 one-way commute trips per week. Among permit holders who live within any zip code served by the Blue Bus, 18.7 percent rode the bus to or from campus during the previous week, and they made an average of 3.8 trips per week.

16. The bus share for students who live *outside* the Blue Bus service area rose from 11 percent to 14 percent, the drive-alone share fell from 64 percent to 59 percent, and the carpool share fell from 15 percent to 11 percent. The large increase in bus ridership could be a function of students' propensity to park off campus and ride the Blue Bus the rest of the way to campus. The large increases in walking and bicycling are probably a function of the small sample size.

17. Williams and Petrait (1993, Figure 2). Miller (2001, 33) reports that the first-year ridership increases at other campuses with Unlimited Access programs ranged from 50 percent at the University of Florida to 200 percent at the University of Colorado at Boulder.

18. Elasticity measures the percent change in ridership divided by the percent change in fare. When fare changes are large, as with BruinGO, the preferred measure of elasticity of demand is the logarithmic arc elasticity. But the logarithmic arc elasticity is undefined when the fare is reduced to zero. Therefore, the fare elasticities for BruinGO are calculated as the linear arc elasticity, or "midpoint" elasticity, which approximates the average elasticity between two points along a demand curve. To calculate the midpoint elasticity, the percent change in fare is defined as the absolute change in fare divided by the average of the two fares between which elasticity is measured. Similarly, the percent change in ridership is defined as the absolute change in ridership divided by the average of the two riderships between which elasticity is measured. See Samuelson and Nordhaus (1989, 425) for an explanation of the midpoint formula. The range of fare elasticities refers to the medium and low estimates of responses to BruinGO.

19. The ranges refer to the medium and low estimates of the responses to BruinGO. The cross-elasticity is the percent change in drive-alone vehicle trips divided by the percent change in transit fare, again calculated as the arc elasticity. The cross-elasticity is positive because public transit and solo driving are substitutes.

20. We combined the student data with the faculty and staff data to calculate these numbers. The combined survey and swipe data show there were 909,000 bus riders per year before and 1.4 million bus riders per year after BruinGO, an increase of 56 percent. The survey data also show there were 6,369 solo drivers per day before and 5,072 solo drivers per day after BruinGO, a decrease of 20 percent. These results are close to those observed when the University of Washington began its U-Pass Program: a 57 percent increase in bus ridership and a 30 percent decrease in solo drivers.

21. The number of rides increased from 1,383,479 in the first year to 1,750,640 in the second year (communication from UCLA Transportation Services, November 27, 2002). This shows that the one-year fare elasticities reported in the text underestimate BruinGO's longer-run effects.

22. Additional unscheduled "booster" buses are also run during peak hours and days when overcrowding would otherwise occur. These booster buses are deleted during university holidays, when demand is low. The first scheduled bus arrives on campus at 5:53 a.m., and the last one leaves at 12:08 a.m. The route structure and timetables for the Blue Bus are available online at <http://www.bigbluebus.com/home/index.asp>.

23. The comments on this and the following page are taken from a survey of UCLA students, staff, and faculty. The comments are available at <http://www.sppsr.ucla.edu/its/bruingo.pdf>.

24. The program clearly provides net benefits to the transit agency, or it would not participate. BruinGO also produces significant benefits for the community because it reduces solo driving to UCLA, and in turn reduces traffic congestion and vehicle emissions.

25. UCLA Transportation Services provided the data on the shares of total permit revenue paid by faculty, staff, and students, and on the shares of total daily sales revenue paid by faculty, staff, students, university departments, and visitors. Many visitors attend athletic events, concerts, lectures, theatrical performances, and other events on campus. Because they pay for parking by the hour or day, visitors account for a disproportionate share of total parking revenue.

26. This cost includes \$640,000 for BruinGO rides and \$170,000 for administration and marketing.

27. For *financing* BruinGO, both the administrative cost (\$170,000) and the fare payments (\$640,000) are the same: UCLA must cover both. But for *evaluating* BruinGO, these two costs are utterly different. The administrative costs represent a consumption of resources (mainly UCLA staff time), while the fare payments represent an income transfer to students, staff, and faculty.

28. Most riders paid the cash fare of 50¢ per ride before BruinGO began, so valuing the existing riders' fare reduction benefit at UCLA's price of 45¢ per ride is a conservative estimate of BruinGO's benefit to the existing riders. UCLA paid the Blue Bus for 1.4 million BruinGO rides. According to the swipe data, students made 73 percent of the rides (1.4 million x 73 percent = 1,038,222 rides) and faculty and staff made 27 percent (1.4 million x 27 percent = 384,000 rides). The swipe data do not allow us to break these numbers down into new and existing rides, but the transportation surveys do. The student survey showed that the bus mode share for those who live inside the Blue Bus service area was 17 percent before and 24 percent after BruinGO. Therefore, those who rode the bus before BruinGO made 71 percent ($17 \div 24$) of student rides and new riders made 29 percent ($7 \div 24$). Existing student riders thus made 737,138 rides (1,038,222 rides x 71 percent), and new student riders made 301,084 rides (1,038,222 rides x 29 percent). The faculty/staff survey showed that the bus mode share for those who live inside the Blue Bus service area was 9 percent before and 20 percent after BruinGO. Therefore, those who rode the bus before BruinGO made 45 percent ($9 \div 20$) of faculty/staff rides and new riders made 55 percent ($11 \div 20$). Existing faculty/staff riders thus made 172,800 rides (384,000 rides x 45 percent), and new faculty/staff riders made 211,200 rides (384,000 rides x 55

percent). Existing riders made a total of 909,938 rides (737,138 + 172,800), and new riders made a total of 512,284 (301,084 + 211,200) rides.

29. This area under the demand curve for the new rides is the consumer surplus enjoyed by the riders (Friedman 2002, 202).

30. From a parking-centered view of BruinGO, the fare payments are money down the drain (because in this view BruinGO's only purpose is to reduce parking demand). From a broader university-centered point of view, however, the spending for bus fares becomes additional income for students, staff, and faculty.

31. Memo from the UC Office of the President to the UC Regents, November 7, 2001.

32. The structure cost \$47 million for 1,500 spaces, or \$31,500 per space. UCLA borrowed the money to finance the structure at 6.125% for 27 years, and incurred an annual debt service of \$2,414 per debt-financed space. When the annual operating cost of \$259 per space is included, the annual total cost per debt-financed space is \$2,673, or \$223 per space per month. This high cost of structured parking is not unique to UCLA. The Parking and Transit Services department at the University of Colorado at Boulder reports that the estimated debt service for a new parking structure on campus is \$227 per month for each parking space added by the structure.

33. Intramural Field Parking Structure Final Environmental Report, May 2001, Vol. I, Table IV.I-4. The EIR reports the vehicle trips and emissions per day. To obtain the annual values, the daily values are multiplied by the number of weekdays per year (excluding all trips on the weekends).

34. UCLA's fare subsidy was \$640,000 for nine months (see Table 3), and faculty/staff accounted for 27 percent of all BruinGO rides, so the fare subsidy for faculty/staff was \$19,200 per month ($\$640,000 \times 0.27 \div 9$).

35. BruinGO offers free transit only to Blue Bus riders, while the consultant estimated the cost of transit passes for all bus lines to campus. Nevertheless, the Blue Bus carries most of the transit riders to UCLA, and extending it to the other lines would not greatly increase the cost. BruinGO offers free transit to *all* of UCLA's 31,000 employees, not merely to those without a parking permit, so it is far more generous to faculty and staff than what the consultant proposed. UCLA is also undercharged for BruinGO, because some riders report the bus drivers sometimes allow UCLA riders to board without swiping their BruinCards. A more accurate record of the boardings would therefore increase UCLA's cost for BruinGO.

36. See Crain and Associates (1998, 47) for the consultant's prediction.

37. See Crain and Associates (1998, 47).

38. Permit Holders Survey of the BruinGO Transit Pass Program, UCLA Transportation

Services, March 2002.

39. See UCLA Transportation Services (2001d). Daily sales revenue comes both from the 1,400 spaces reserved for daily sales, and from other spaces that are not used by permit holders in the evenings and on the weekends.

40. Each *permit* converted to daily sales generates an additional \$897 in annual revenue. Because UCLA sells 1.35 permits per space, each *space* converted to daily sales generates an additional \$1,211 in annual revenue. Each space converted to meters will generate an even greater increase in revenue.

41. BruinGO costs 45¢ per boarding, so the subsidy for a student, staff, or faculty member who commutes to campus 22 days a month is \$20 a month ($\$0.45 \times 2 \times 22$). UCLA provides an on-campus shuttle service to transport commuters from their parking spaces to their destinations on campus, and also for other trips around campus. The cost of the Campus Express is \$1.41 per boarding, so the subsidy for someone who parks on campus 22 days a month and then takes the shuttle to and from the final destination is \$62 a month. UCLA provides a vanpool program for commuters, and the subsidy per rider is \$65 a month. The newest parking structure at UCLA will cost \$223 per space per month, and the price of a permit to park in it will be \$54 per month. The subsidy for a solo driver who commutes to campus 22 days a month and parks in the IM Field structure will therefore be \$169 a month. UCLA provides a free shuttle service to off-campus housing for graduate students, and the cost is \$4.38 per boarding, so the subsidy for a student who commutes to campus 22 days a month is \$193 a month. UCLA provides a free shuttle service to the off-campus faculty housing in Beverly Glen, and the cost is \$8.95 per boarding, so the subsidy for a faculty member who commutes to campus 22 days a month is \$394 a month.

42. In 2002-2003 the fee that UCLA pays to the Blue Bus may increase to 60 cents per boarding. At this price, the savings from shifting riders from the Campus Express to BruinGO are 81 cents per boarding ($\$1.41 - \0.60), or \$1.1 million per year ($\0.81×1.3 million rides).

43. One way to think about the choice between BruinGO and a new parking structure is to consider the cost per new parking space as a rental value. Building a parking structure is the same as renting 1,500 parking spaces at a cost of \$223 per space per month. UCLA can rent parking spaces for \$223 per month each, and sell permits to park in them for \$54 a month, or instead use the subsidy to provide BruinGO.

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Sample pages from UCLA's 2001 Employee Commute Reduction Plan

Response to Comment Letter 31

Letter from Don Shoup, dated December 18, 2002

Response to Comment 31-1

This comment, which quotes text from the 2002 LRDP Draft EIR, is acknowledged.

Response to Comment 31-2

This comment is acknowledged. The trip generation rates used in traffic analysis of the 2002 LRDP reflect conditions in effect at the time the Notice of Preparation was filed, at which time the BruinGo pilot program was in effect. Refer to Topical Response A (BruinGo program) for a discussion of the BruinGo program.

Response to Comment 31-3

This comment is acknowledged.

Response to Comment 31-4

This comment is acknowledged.

Response to Comment 31-5

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program, which indicates that the campus has proposed to extend BruinGo.

Response to Comment 31-6

Refer to Response to Comment 31-5 and Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 31-7

Refer to Response to Comment 31-5 and Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 31-8

Refer to Response to Comment 31-5 and Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 31-9

Refer to Response to Comment 31-5 and Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 31-10

Refer to Response to Comment 31-5 and Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 31-11

Refer to Response to Comment 31-5 and Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 31-12

As discussed in Response to Comment 31-2, existing trip generation rates used in the 2002 LRDP Draft EIR reflect the effects of the BruinGo pilot program. As discussed in the 2002 LRDP Draft EIR (Volume 1, page 4.13-39):

With the changes in campus population, provision of additional on-campus housing, and the resultant reallocation of parking spaces, future on-campus trip generation rates would change as shown in Table 4.13-22 (Future [with 2002 LRDP] On-Campus Trip Generation Rates).

The future trip rates utilized in the traffic analysis in the 2002 LRDP Draft EIR were based upon continued implementation of the TDM program, which was assumed would maintain average vehicle ridership at 1.5, a level that was achieved by the Spring of 2000, as noted in the 2002 LRDP Draft EIR (Volume 1, page 4.13-16). Thus, the future trip rates were based upon vehicle ridership, not continued implementation of any specific element of the TDM program, including BruinGo. Thus, the comment is incorrect in claiming that current trip generation rates were used to estimate the future impacts that would result from implementation of the 2002 LRDP.

Refer also to Topical Response A (BruinGo Program), which clarifies that the 2002 LRDP Draft EIR did not reject BruinGo as a feasible mitigation measure for faculty, staff, or students.

Response to Comment 31-13

Refer to Response to Comment 31-12 for a discussion of trip generation rates and the BruinGo program.

Response to Comment 31-14

This comment is acknowledged. The University acknowledges that the data cited is accurate and verifiable.

Response to Comment 31-15

The issues raised in this comment were responded to in Responses to Comments 31-1 through 31-14.

It is unclear whether the document attached to this comment letter contains a comment directed at the physical environmental effects of the 2002 LRDP, as analyzed in the 2002 LRDP Draft EIR, or is a comment on the adequacy of the 2002 LRDP Draft EIR as an informational document in accordance with the requirements of CEQA. In addition, it is impossible to discern the specific concerns of the comment from the text of the document. While this document will be included in the administrative record for the 2002 LRDP, absent a specific comment on the content or adequacy of the 2002 LRDP Draft EIR, it is impossible to prepare a response, and CEQA does not impose such a requirement.

Refer also to Topical Response A (BruinGo Program) concerning the assertions that the BruinGo pilot program increases transit ridership and reduced vehicle trips.

The University concurs that members of the UCLA and Los Angeles communities should be fully and accurately informed concerning the impacts of the LRDP and the potential of the BruinGo program to mitigate those impacts. Responses to all comments received on the 2002 LRDP Draft EIR will be forwarded to the commentors and will be included in the Final EIR, which will be forwarded to The Regents and made available for review during normal business hours at UCLA Capital Programs.

December 17, 2002

Mr. Curtis Zacuto
Principal Environmental Planner
UCLA Capital Programs
1060 Veteran Avenue
Los Angeles, CA 90095-1365

RE: BRUIN-GO SHOULD BE MADE PERMANENT

Dear Mr. Zacuto:

Professor Donald Shoup says it better than I could. I'm attaching his letter, with my comments at the end.

"I am writing to comment on the Draft Environmental Impact Report for UCLA's 2002 Long Range Development Plan. The EIR states that implementation of the Development Plan will substantially increase traffic congestion and vehicle emissions in Westwood. The EIR also states that continuing BruinGO is not a feasible strategy to mitigate these impacts: *"Transit subsidies for faculty and staff have previously been evaluated and have not been recommended because of the limited potential to reduce total parking demand."* (page 4.13-47). The EIR does not even mention the option of continuing BruinGO for students.

The EIR's rejection of BruinGO as a traffic mitigation measure is completely at odds with the evaluations of BruinGO conducted by your traffic consultant and by UCLA's Institute of Transportation Studies.

BruinGO substantially increased bus ridership for commuting to campus during its first year (2000-2001). BruinGO is offered in partnership with the Santa Monica Blue Bus, and about 7,400 faculty and staff live within the Blue Bus service area (35 percent of all faculty and staff). For faculty and staff who live *inside* the Blue Bus service area, the bus mode share for commuting rose from 8.6 percent to 20.1 percent in the year after BruinGO began. The total number of faculty/staff bus commuters in the Blue Bus service area increased by 134 percent ($11.5 \div 8.6$), and 57 percent of all the bus riders were new riders ($11.5 \div 20.1$). For those who live *outside* the Blue Bus service area, bus ridership remained essentially unchanged. These results were reported by your transportation consultant for the EIR, Crain and Associates, who evaluated BruinGO's performance during 2000-2001.¹

Faculty/staff bus share for commuting

	<u>Blue Bus Service Area</u>	
	<i>Inside</i>	<i>Outside</i>
<i>Before BruinGO</i>	8.6%	7.2%
<i>With BruinGO</i>	20.1%	7.6%
Difference	11.5%	0.4%
Percent change	134%	6%

Source: Crain & Associates (2002, Tables 3 & 4)

The shift to public transit significantly reduced solo driving to campus: 37 percent of the new bus riders were former solo drivers. Even commuters with parking permits occasionally rode the bus: among permit holders who live within the Blue Bus service area, 19 percent

32-1

32-2

museums, libraries, concerts, lectures, plays, conferences, and athletic events. Students, staff, and faculty who regularly commute by bus will also find it easier to pay for parking on campus on days when they need their cars. This change will also help to counter UCLA's image as an ivory tower with parking as its moat.

Option 2. Use BruinGO to replace the Campus Express

In FY 2000-2001, UCLA paid the Blue Bus \$640,000 to carry 1.4 million BruinGO riders to and from campus (45¢ per trip), while it paid \$1.9 million to transport 1.3 million riders for much shorter trips on the Campus Express (\$1.41 per trip). Some universities have merged their campus shuttles with the local public transit systems to take advantage of the government subsidies that are available only for public transit. If UCLA merges its shuttle service into BruinGO, it would save the \$1.9 million a year it now spends for the Campus Express.

The Blue Bus could reroute two or three of its five lines that now stop at the edge of campus, and bring them on campus to follow the Campus Express routes. One Blue Bus line and one Culver City (Green Bus) line to UCLA already duplicate the Westwood Village-to-Ackerman Union route, so including the Green Bus in BruinGO could replace that route. Because most on-campus rides would be very short, and would occupy otherwise empty seats, the transit agencies could charge a low fare compared with UCLA's cost of \$1.41 per ride on the Campus Express.

The savings from merging the shuttle service into BruinGO should be more than enough to pay for BruinGO, and to expand the program to include the Green Bus. The total cost of BruinGO will increase because of the payments for all the on-campus shuttle rides, but each ride shifted from the existing shuttle service to BruinGO would save 96¢ (\$1.41 for the Campus Express but only 45¢ for BruinGO). For the current 1.3 million shuttle rides per year, the savings would be \$1.25 million per year, which should be enough to pay the full cost of the expanded BruinGO program.⁶

Campus Express Map

Merging the shuttle system with BruinGO will also provide better on-campus transit service. The Campus Express shuts down in the evening and on weekends and holidays, but the Blue Bus and the Green Bus operate in the evening and on weekends and holidays, so riders will enjoy more frequent service with extended hours. This strategy will also improve BruinGO itself, because bus riders could travel directly to the center of campus, rather than only to the edge of campus. Because the Culver City Bus line to campus passes several off-campus student housing complexes, including it in BruinGO will also improve many students' access to campus. Bringing BruinGO onto campus would also respond to the nearby residents' complaints about the traffic, air quality, and noise at the Hilgard Avenue bus terminal.

CONCLUSION

The evaluations conducted by both Crain and Associates and the Institute of Transportation Studies show that BruinGO is a feasible way reduce UCLA's traffic generation. The EIR's failure to seriously consider this mitigation strategy raises serious questions about the

Another study examined the changes in travel patterns of the 17,000 students who live within the BruinGO service area (44 percent of all students).³ During BruinGO's first year, the students' transit ridership for commuting to campus increased by 43 percent, and solo driving decreased by 33 percent. Again, these changes are significant.

These increases in bus ridership and reductions in solo driving refer only to the changes that occurred during BruinGO's first year. During its second year (2001-2002), total BruinGO ridership increased by a further 27 percent, so its effectiveness has since increased.

Despite the large increases in bus ridership and declines in solo driving after BruinGO began, the EIR dismisses the option of continuing BruinGO. This rejection of BruinGO as a traffic mitigation strategy raises several questions.

Is more than doubling the number of faculty and staff who ride the bus to campus an insignificant change? Is a 9-percent reduction in solo driving to campus an insignificant change?

UCLA's total fare payments for faculty and staff during BruinGO's first year were \$160,000, which is equivalent to the cost of five new parking spaces in the IM Field Parking Structure. Is this too much for UCLA to pay to continue BruinGO for all faculty and staff?

Is the 43-percent increase in students' bus ridership to campus an insignificant change? Is the 33-percent reduction in solo driving an insignificant change? Why does the LRDP not even mention the option of continuing BruinGO for students?

32-2

PAYING FOR BRUINGO

Perhaps the EIR assumed that BruinGO costs too much to consider as a way to mitigate UCLA's traffic generation. What other reason would UCLA have for not continuing BruinGO? I will suggest two ways to pay for BruinGO, either of which can finance its full cost.

Option 1. Use some released parking spaces for daily sales

BruinGO caused more than 1,000 student, staff, and faculty commuters to give up their parking spaces and take the Blue Bus to UCLA. These released spaces did not remain vacant, of course, because UCLA can sell them to daily visitors or to students on the wait list for a parking permit. Because the released spaces would not have been available to new users without BruinGO, the added revenue can be used to pay for BruinGO.

The UCLA Parking Service estimates that each daily-sales parking space generates \$1,200 per year more than a permit space.⁴ This occurs because visitors pay \$2 per hour or \$7 per day parking on campus, but most students, staff, and faculty pay only \$54 per month for permits.⁵ If only half the 1,000 spaces released by commuters who shifted from solo driving to transit were used for daily sales rather than permits, UCLA would earn an additional \$600,000 a year in parking revenue to pay for BruinGO. Beyond paying for BruinGO, increasing the number of spaces available for visitors will enable the university to welcome more people to its

CONCLUSION

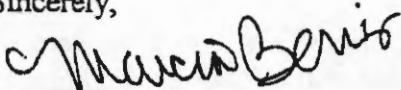
The evaluations conducted by both Crain and Associates and the Institute of Transportation Studies show that BruinGO is a feasible way reduce UCLA's traffic generation. The EIR's failure to seriously consider this mitigation strategy raises serious questions about the university's priorities. Chancellor Carnesale has told the Academic Senate that "our budget should reflect our strategy." UCLA plans to construct 4,149 new parking spaces but not to continue BruinGO. What transportation strategy does this budget reflect?" Donald C. Shoup

32-2

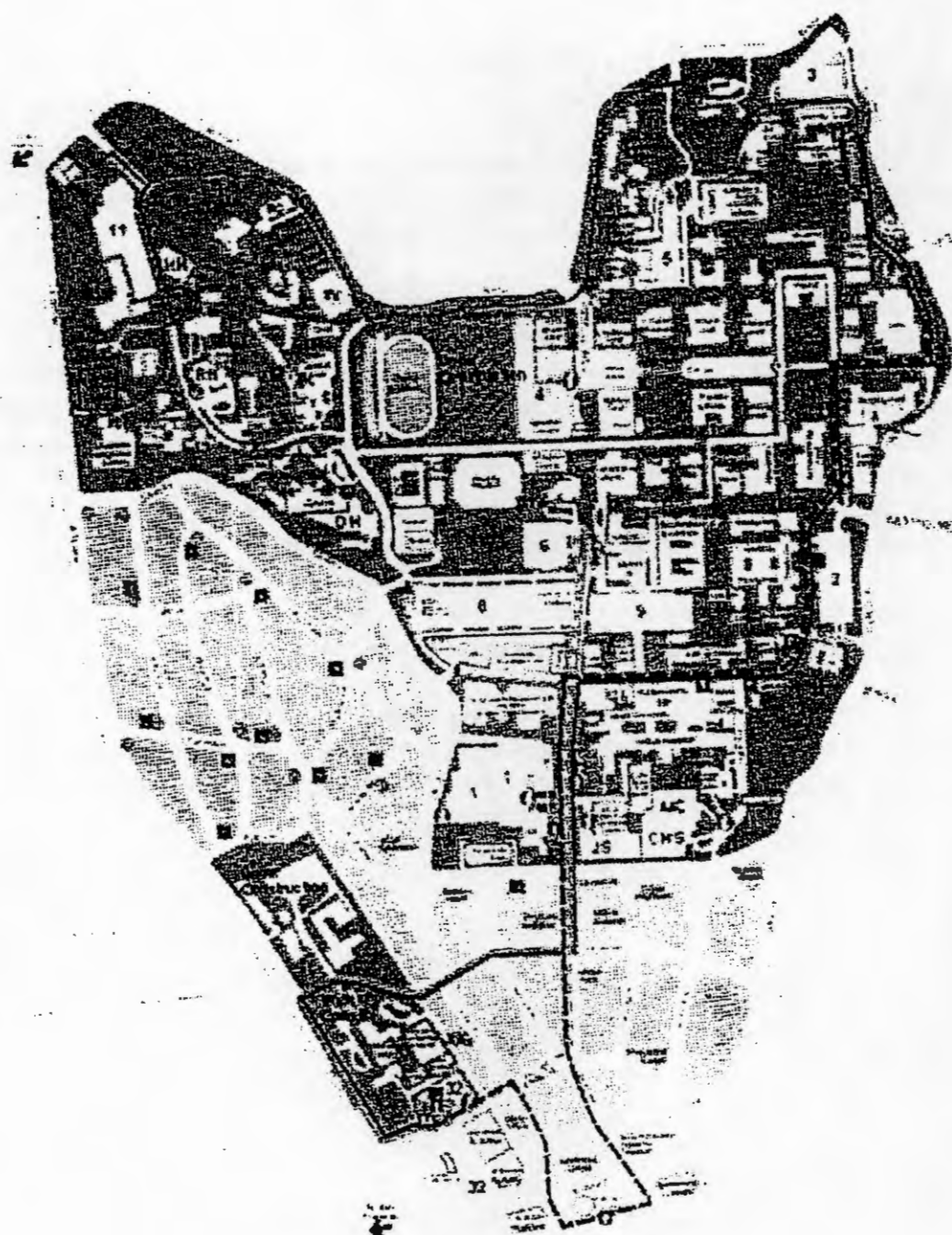
IN LIGHT OF ALL THE FACTS LISTED HEREWITH, I RECOMMEND UCLA SHOULD MAKE BRUINGO PERMANENT.

32-3

Sincerely,



Marcia Berris
University of California, Los Angeles
School of Public Policy & Social Research
3250 Public Policy Building
165606



ENDNOTES

1. Crain and Associates, "UCLA BruinGO! Transit Pass Program," Prepared by for UCLA Transportation Services, April 2002.
2. Permit Holders Survey of the BruinGO Transit Pass Program, UCLA Transportation Services, March 2002.
3. Boyd, Brent, Melissa Chow, Robert Johnson, and Alexander Smith. "University Transit Passes: An Evaluation." UCLA Master's degree client project prepared for the Los Angeles County Metropolitan Transportation Authority, 2002.
4. The Transportation Service reported to the Transportation Services Advisory Board that each *permit* converted to daily sales generates an additional \$897 in annual revenue. Because UCLA sells 1.35 permits per space, each *space* converted to daily sales generates an additional \$1,211 in annual revenue. Each space converted to meters will generate an even greater increase in revenue. This estimate is *extremely* conservative because it assumes that the each daily-sales space generates only \$7 per day. UCLA's *2002 Long Range Development Plan Draft Environmental Impact Report* states that each daily-sales space turns over 2.8 times per day, which implies that each space generates \$20 per day (see Table 4.13-6.)
5. Daily sales revenue comes both from the spaces reserved for daily sales, and from other spaces that are not used by permit holders in the evenings and on the weekends.
6. In 2002-2003 the fee that UCLA pays to the Blue Bus may increase to 60 cents per boarding. At this price, the savings from shifting riders from the Campus Express to BruinGO are 81 cents per boarding (\$1.41 - \$0.60), or \$1.1 million per year (\$0.81 x 1.3 million rides).

Response to Comment Letter 32

Letter from Marcia Berris, dated December 17, 2002

Response to Comment 32-1

This comment contains introductory information, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. See Responses to Comments 31-1 through 31-15.

Response to Comment 32-2

As stated in Comment 32-1, this comment restates the comments provided in Comment Letter 30, which is included in this Final EIR as Letter 30. Please refer to Responses to Comments 30-1 through 30-15 and Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 32-3

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

6-1310

Capital Programs**Comment Letter 33****Please Register to Comment Online**

In order to submit online comments for this draft document, you must register with us. If you have registered before, please enter your email address below and scroll down to the comments section. You do not have to reenter your name and address information again.

[Privacy Notice](#)**Registered Users**email: * **New Users**first name: * last name: * address: * city: * state: * zip: * organization:

(if any)

phone number: () ext: email address:

(required for return visits)

* required field

Comments -

Comments:*
Please review and edit
your comments before
submitting.

Please make your arrangement with the Blue Bus
permanent. It allows me to commute to and from
campus with out my car. Also, please consider
adding the Culver City bus to your program. It
would give students a greater geographic range to
consider when searching for housing.

PS. Your website is entirely unclear about how to
register in order to submit comments.

Submit Comments

33-1

33-2

Response to Comment Letter 33

Facsimile from Maureen Dunnigan, dated December 20, 2002

Response to Comment 33-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 33-2

This comment is acknowledged. The difficulty was due, in part, to a design issue, in that the “registered user” box is located directly above the “new user” box on the page. Providing input in both fields generates an error message. Note, however that well over 300 emails were received by the campus, and that email was only one venue provided for accepting public comment. Refer to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the length and timing of the 2002 LRDP Draft EIR public review period, as well as the opportunities provided for public comment and public participation.

110 Westwood Plaza, Suite A101d, Los Angeles, CA 90095-1464
Fax: 310-206-7539

Executive Education Programs

Fax

Comment Letter 34

To: UCLA Capital Programs

From: Patricia Lee

Attn: Environmental Planning

Fax: (310) 206-1510

Pages: 2

Phone:

Date: 12/20/2002

Re: BruinGO Comments

CC:

☒ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

• Comments:

Patricia Lee
The Anderson School at UCLA
Executive Education Programs
110 Westwood Plaza, Suite A101d
Los Angeles, CA 90095-1464

December 20, 2002

UCLA Capital Programs
Attn: Environmental Planning
1060 Veteran Avenue
Los Angeles, CA 90095-1405

To Whom It May Concern:

I tried to submit my comments online but received the message below. Here are my comments then the error message.

Comments:

I ride the bus to work every day. I don't understand how keeping the BruinGO would be a "limited potential to reduce total parking demand." In fact, if I didn't ride the bus to work, I would need a to park on campus. Also, riding the bus promotes preservation of the environment. I think it is unfortunate that this benefit to employees, faculty and students will be taken away. We have given so much in the way of service and patience. To rob us of this benefit would be unconscionable and unwise. I also think it is unfortunate that your site doesn't work and that you are requiring these comments by December 20, 2002 when most everyone is away between quarters.

Error message from the site:

Insert Into CIP_Users

(FirstName,LastName,Address,City,State,Zip,Organization,AreaCode,Phone,Ext,Email)

Values ('Patrica','Lee','110 Westwood Plaza, Suite A101d','Los

Angeles','CA','90095','Anderson School at UCLA (Executive Education

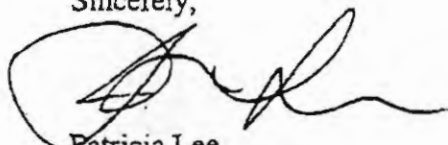
Programs)','310','206-1996',Null,'patlee@anderson.ucla.edu')

Microsoft OLE DB Provider for SQL Server error '80040e57'

String or binary data would be truncated.

/cipComments.asp, line 133

Sincerely,



Patricia Lee
Programmer Analyst

34-1

34-2

34-3

34-4

Response to Comment Letter 34

Facsimile from Patricia Lee, dated December 20, 2002

Response to Comment 34-1

Refer to Response to Comment 33-2 for a discussion of the use of the Capital Programs website to submit electronic comments on the 2002 LRDP Draft EIR.

Response to Comment 34-2

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 34-3

The comment period began well before the start of final examinations, and continued for over a week after the conclusion of final examinations, allowing students, faculty, staff, and other interested parties ample opportunity to review and comment upon the 2002 LRDP Draft EIR without impacting academic priorities. Further, the 50-day review period for the 2002 LRDP Draft EIR exceeded the 45-day review period required under CEQA.

Refer also to Topical Response E (Opportunity to Submit Public Comments) for a discussion of the adequacy of the public review period.

Refer to Response to Comment 34-1 for a discussion of technical difficulties submitting comments via the Web.

Response to Comment 34-4

Refer to Response to Comment 33-2 for a discussion of the use of the Capital Programs website to submit electronic comments on the 2002 LRDP Draft EIR.



MEMORANDUM

Department of Economics
147703

Comment Letter 35

December 18, 2002

UCLA Capital Programs
Attn: Environmental Planning
1060 Veteran Ave.
Los Angeles, CA 90095-1405

To Whom It May Concern:

I am writing to lend my support to the BruinGo campaign. I use BruinGo while I am on campus. There are times when I need to go off campus, to places that the UCLA busses don't go. That is when I use it.

I also work with many students who I have seen on the Santa Monica bus. They come long distances, and use it regularly. I have asked many students, and they appreciate the service, as some of them don't have cars and others can't get parking on campus.

We have a student intern in our office who takes the BruinGo bus 3 times a week, as she cannot get parking on campus.

I feel that you are being very short sighted if you cancel this program. Instead of building more parking garages, add more lines. If the MTA were free, I would take it to work, instead of driving my car. Not only to not pay \$100's of dollars for parking, but to improve the congestion and air quality in the area.

Please, please don't get rid of this very serviceable program.

Thank you,

A handwritten signature in cursive script that reads "Sandy Levin".
Sandy Levin

Department of Economics
Academic Counselor
X54708

35-1

Response to Comment Letter 35

Facsimile from Sandy Levin, dated December 18, 2002

Response to Comment 35-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

UCLA SCHOOL OF LAW
405 HILGARD AVENUE
LOS ANGELES, CA 90095-1476

FAX TRANSMITTAL COVER SHEET

Comment Letter 36

Date: 12/20/02

Transmission to:

UCLA Capital Program X 61510

Name

FAX #

Number of pages (including cover): 2

Transmission from: Karen Mathews

Professor
UCLA School of Law

(310) 267-0158

Fax Number

Office Phone

(apologies for sending after 5:00 -
could not use the online form.)

- Km

To repeat myself (sorry, am having trouble with the online form...)

36-1

I am a staffmember at UCLA, in the School of Law. I am also on the Steering Committee of a public transit advocacy group called Friends4Expo Transit.

36-2

I strongly urge you to KEEP BRUINGO, and to encourage/provide incentive to staff to give up their parking passes and use the program.

36-3

I use BruinGo occasionally, but have hesitated to give up my parking pass. However, I (and I'm sure other staffmembers) would be more inclined to opt out of monthly parking, IF: 1) we knew we could opt back in, in the same parking structure, at the beginning of each new semester; and 2) we were given a number of daily passes for emergencies -- say 10 per semester -- to use as needed (or, were allowed to purchase them at a discount from the \$7 daily fee). Also -- and importantly -- if the money saved by the school was APPLIED DIRECTLY TO BRUINGO, as Prof. Shoup suggests, that would be even more incentive, as those who opted out of monthly parking could feel proud of doing their bit to ease the parking crunch -- double incentive! (besides the obvious money-saving one).

36-4

Thanks for considering this suggestion.

-- Karen Mathews
(310) 206-7610
(310) 473-4897

Response to Comment Letter 36

Facsimile from Karen Mathews, dated December 20, 2002

Response to Comment 36-1

Refer to Response to Comment 33-2 for a discussion of the use of the Capital Programs website to submit electronic comments on the 2002 LRDP Draft EIR.

Response to Comment 36-2

This comment contains introductory information, and is not a direct comment on the content or adequacy of the 2002 LRDP Draft EIR. Therefore, no response is required.

Response to Comment 36-3

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

Response to Comment 36-4

Allocation of parking permits is performed on an annual, or semester/quarterly basis. (The graduate programs in medicine, law and management programs currently operate on the semester system, while other academic programs operate on the quarter system.) Those individuals that are eligible for, and receive, an annual parking permit are assigned a single parking location for the entire year. Those persons that elect to receive a semester (or quarterly) permit are assigned a parking location based upon available supply in individual lots (which is determined based upon parking allocations—some lots have little or no student parking—and available capacity, which is based upon the number of annual permits that have already been allocated to those lots). To assure that BruinGo participants could “opt back in” to their preferred parking location, parking permit allocations for individual lots or structures would have to reserve some number of permits for a subsequent semester (or quarter). This would result in underutilized capacity during the fall, when parking demand is the greatest. Thus, the University does not consider this concept as feasible.

All faculty and staff bus riders who (or users of any alternative transportation mode) are eligible for a Ridecard, which allows them to purchase reduced fee daily parking.

The potential for the BruinGo to result in cost savings is not supported by any evidence. Refer also to Response to Comment 30-13.

Comment Letter 37

December 18, 2002

Comment on Draft EIR:

First, the online EIR comment is a dead link (on the URL: http://www.capital.ucla.edu/Doc2Review_2.asp) as of December 18, 2002 at 1 PM. If you report that no has used it, this will be very deceptive.

37-1

Second, the BruinGo evaluations are completely wrong and deceptive. One of the most positive campus efforts at reducing traffic congestion and parking, the program has a long history of being ignored by those who see only parking as a viable future for UCLA, rather than a mixed use system. It is an insult to the campus community to eliminate this program.

37-2

Sincerely,



Eric Monkkonen
History

Response to Comment Letter 37

Facsimile from Eric Monkkonen, dated December 18, 2002

Response to Comment 37-1

Refer to Response to Comment 33-2 for a discussion of the use of the Capital Programs website to submit electronic comments on the 2002 LRDP Draft EIR.

Response to Comment 37-2

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

UCLA 206-1510

Comment Letter 38

UCLA Capital Programs
Attn: Environmental Planning

Bruin Go should remain in
effect for both staff and
employees of UCLA and UCLA-Santa Monica

It would be a disservice to the
community and environment if you
got rid of it.

Thank you.

Maria Reynoso

38-1

Response to Comment Letter 38

Facsimile from Maria Reynoso, dated December 18, 2002

Response to Comment 38-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPin

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:33 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Comment Letter 39

Datetime: Dec 17 2002 10:38AM

Name: Aberbach, Joel

Address: 10453 Colina Way

City: Los Angeles

State: CA

ZIP: 90077

Organization: UCLA

Phone:

Email: Aberbach@polisci.ucla.edu

Date Register: Dec 17 2002 10:37AM

Comment: Keep Bruingo. It is a proven system for decreasing car traffic and improving environmental quality.

39-1

Response to Comment Letter 39

E-mail from Joel Aberbach, dated December 17, 2002

Response to Comment 39-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPin

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:26 AM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Comment Letter 40

Datetime: Dec 18 2002 8:36AM
Name: Adams, Matthew
Address: 9029 Beverlywood Street
City: Los Angeles
State: CA
ZIP: 90034

Organization:
Phone: 310558-1530
Email: madams@mednet.ucla.edu

Date Register: Dec 18 2002 8:36AM

Comment: I have used Bruin Go as a staff member since I started at UCLA. This is the only time I use public transportation since I have my own car.

While it took sometime to get used to public transportation, I have seen the advantages first hand through savings in parking and gas and reducing congestion and pollution. There certainly has not been a lack of ridership to and from UCLA on my route (Big Blue Bus 12). It is usually standing room only.

40-1

This a program that sets UCLA apart from other institutions and demonstrates its good faith in helping the environment and aliviating congestion.

Sincerely,

Matthew D. Adams

Response to Comment Letter 40

E-mail from Matthew Adams, dated December 18, 2002

Response to Comment 40-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:26 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 10:34PM

Name: Aelony, Shana

Address: 8413 Vicksburg Ave

City: Los Angeles

State: CA

ZIP: 90045

Organization: UCLA UP st

Phone: 3106496622

Email: saelony@ucla.edu

Date Register: Dec 17 2002 10:34PM

Comment: To whom it may concern:

In Los Angeles the only way to reduce solo driving is to change the behavior of our citizens. The BruinGo program is an important seed in this process. UCLA students such as myself may begin taking the bus out of necessity, when a parking request is denied. However, having been born and raised in Los Angeles County, my lifelong experience and assumptions about the public transit system have been altered since I began riding public transit again - only as a result of that denial and the convenience of the BruinGo program relative to daily parking costs in Westwood. Believe me, I was a tough convert. I had not taken public transport in Los Angeles since I was in junior high school and it was still run by the RTD.

The beauty of BruinGo, is that now while my funds are limited (since I am a full-time student), I can contribute to improving traffic congestion and air quality in Los Angeles through the program. Once I have returned to the workforce, I may continue to take public transit. That possibility would never have existed without this crucial exposure. Public transportation has been simplified and made alluring and accessible by this program. Furthermore, my new positive experience of Santa Monica's Blue Bus has laid the groundwork for me to feel confident in trying other bus services. I now ride the MTA, and the Culver City Bus as well. Certainly, I have not yet sold my car. Still, rather than using it on a daily basis for solo travel, I now generally use it alone only for "bulk" transport such as shopping or for longer distance travel.

In other words, the BruinGo program had led to a direct reduction in the car usage and particularly the solo car driving of this individual, and I am certain to be one of hundreds if not thousands of such students and faculty members.

UCLA has a serious parking crisis. The university's support of the Santa Monica Blue Bus is a way to alleviate the parking problem, since everyone acknowledges that some students park along the Blue Bus route rather than foregoing driving at all. It is also a way of exposing students to public transit as a viable and convenient commuting option, updating attitudes about public transit, and changing behavior for the better.

As a public university, UCLA should continue to cultivate programs which forward the long-term interests of the people of California. We are the students, and we are the bus riders, please do not force us to reconsider the dollar costs and benefits of public transport before we've been fully converted. Please continue the BruinGo program for faculty, staff and students at UCLA. The air, roadways, and commuters of Southern California will be grateful.

Thank you for your time,

Shana Aelony
Masters Candidate, Urban Planning

41-1

Response to Comment Letter 4I

E-mail from Shana Aelony, dated December 17, 2002

Response to Comment 4I-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program. It should be noted that even if the BruinGo program were not continued, the cost of commuting to campus via public transit would continue to be less than commuting via a solo-occupant vehicle. Despite the recent fare increase on the SMMBL line, the cost of commuting to campus at full fare is approximately \$32.50 per month (52 weeks per year divided by 12 months, five weekdays per week, and a \$1.50 roundtrip fare per day). Not including transfers, the cost of commuting via the MTA is approximately \$58.50 per month (at \$2.70 per roundtrip), although transit pass options can reduce this cost. As many student schedules do not include classes five days a week, the actual cost for students may be less. Even for commuters that must transfer between bus lines or service providers (and thus must incur the cost of one or more transfers) the recently introduced Regional EZ pass (currently \$58 per month) can reduce the cost of commuting via transit (below cash fares) and is accepted by 12 public transit service providers in Los Angeles County, including all public transit lines that provide direct service to the UCLA campus (including the MTA, SMMBL, Culver City, LADOT and Santa Clarita lines). Given the current cost of a yellow/commuter student permit (at \$52 per month), when operating costs are considered, the cost of public transit is substantially less than the cost of commuting via a single-occupant vehicle. Even if the BruinGo program were discontinued, the cost of commuting via transit is anticipated to remain substantially less than the cost of a single-occupant vehicle, and would remain an affordable and attractive commuting option.

EnvPln

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:26 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 18 2002 8:33AM

Name: Alcond, Kirk

Address: Box 5060

City: Pine Mountain

State: CA

ZIP: 93222

Organization: UCLA Dept.

Phone: 310825-1626

Email: Kirk@aud.ucla.edu

Date Register: Dec 18 2002 8:32AM

Comment: I am a full time UCLA van rider. Thanks to BruinGo I rarely have to drive to work in order to run shopping errands etc. I make use of BruinGo at least twice a week and heartily recommend its continuance. This program has made a huge difference in the lives of our students here in the Department of Architecture. Most of them have been virtually unable to arrange for parking on campus. The majority of them live in West LA and now ride the bus....We need BruinGo!

42-1

Response to Comment Letter 42

E-mail from Kirk Alcond, dated December 18, 2002

Response to Comment 42-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPin

From: Patlan, Richard
 Sent: Wednesday, December 18, 2002 9:27 AM
 To: EnvPin
 Cc: Mills, Stephen
 Subject: New comment on EIR website:

Datetime: Dec 18 2002 8:51AM

Name: Alcond, Kirk

Address: Box 5060

City: Pine Mountain

State: CA

ZIP: 93222

Organization: UCLA Dept.

Phone: 310825-1626

Email: Kirk@aud.ucla.edu

Date Register: Dec 18 2002 8:32AM

Comment: With 54,594 people on campus, UCLA is one of the largest employers in LA County. We have a huge waiting list for student parking on campus. Our students here in the School of Architecture and Urban Design make major use of BruinGO. I am sure this is true in other departments as well. Our students are all graduate students and get priority parking, if available. What about all the undergraduates who can't get parking? We have had students base their decision to attend UCLA on the existence of the BruinGo program. This seems important to consider...

43-1

Response to Comment Letter 43

E-mail from Kirk Alcond, dated December 18, 2002

Response to Comment 43-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:24 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 8:33PM

Name: altamimi, nadida

Address: 2420 cheney

City: tustin

State: CA

ZIP: 92782

Organization:

Phone:

Email: altamimi2005@student.law.ucla.edu

Date Register: Dec 17 2002 8:32PM

Comment: KEEP THE BRUIN-GO PROGRAM!!!!!!

Many of my friends take the blue bus because of the bruin-go program. Without it, many would choose to drive instead of pay everyday to go back and forth to school...this would create unneeded traffic and chaos. Lots of people use bruin go - it needs to stay

44-1

Response to Comment Letter 44

E-mail from Nadida Altamimi, dated December 17, 2002

Response to Comment 44-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPin

From: Patlan, Richard
 Sent: Tuesday, December 17, 2002 5:32 PM
 To: EnvPin
 Cc: Mills, Stephen
 Subject: New comment on EIR website:

Datetime: Dec 17 2002 9:58AM
 Name: Arkush, Elizabeth
 Address: 1519 Meadowbrook Ave.
 City: Los Angeles
 State: CA
 ZIP: 90019

Organization:
 Phone: 323931-5461
 Email: arkush@ucla.edu

Date Register: Dec 17 2002 9:56AM

Comment: I am writing to urge UCLA to continue the BruinGo program. As you are aware, UCLA is overwhelmingly a commuter campus, and parking facilities are woefully inadequate to meet the demand. Most students have no other option but to take public transportation or pay the exorbitant day use parking fees. In this situation the BruinGo program is most helpful to us.

This program may not have caused demand for parking go down as much as expected, because nearly all students' FIRST choice would be to drive to campus. Failing that, however, the BruinGo program is essential as a good faith effort on UCLA's part to accomodate the needs of its students, faculty, and staff in one of the largest metropolitan areas on the planet. Thank you. Liz Arkush (6th year graduate student)

45-1

Response to Comment Letter 45

E-mail from Elizabeth Arkush, dated December 17, 2002

Response to Comment 45-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPin

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:34 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 12:00PM

Name: Armitage, Anna

Address: 1450 Barry Ave

City: Los Angeles

State: CA

ZIP: 90025

Organization: UCLA Dept

Phone:

Email: armitag9@ucla.edu

Date Register: Dec 17 2002 12:00PM

Comment: I strongly recommend the serious consideration of BruinGO as a traffic mitigation measure. I am convinced that the program has increased ridership and decreased frequency of solo driving. Before the BruinGO program, I drove to campus on a regular basis, but I now rely on the bus system for all of my transportation needs to and from campus. It is an environmentally responsible program, and deserves continued implementation.

46-1

Response to Comment Letter 46

E-mail from Anna Armitage, dated December 17, 2002

Response to Comment 46-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:26 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 18 2002 5:50AM

Name: Arraigada, Diego

Address: 1234 14th st #8

City: Santa Monica

State: CA

ZIP: 90404

Organization:

Phone: 3104341937

Email: darraiga@ucla.edu

Date Register: Dec 18 2002 5:49AM

Comment: As a student an active user of the BruinGO I strongly recommend its continuation. Based on personal experience and the evaluations of the UCLA's Institute of Transportation Studies, I believe that the program is of great benefit for the UCLA and Los Angeles community for it is an actual and mature improvement of their transportation policies. Sincerely,

47-1

Diego Arraigada, architect.

Response to Comment Letter 47

E-mail from Diego Arraigada, dated December 18, 2002

Response to Comment 47-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:32 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 9:31AM
Name: Boisvert, Alexander
Address: 3770 Keystone Ave. #403
City: Los Angeles
State: CA
ZIP: 90034

Organization: UCLA
Phone: 3102870711
Email: boisvert@ucla.edu

Date Register: Dec 17 2002 9:31AM

Comment: I can't believe that you are not recommending that BruinGo come back. I personally think the impact of the program has been tremendous. It has reduced the need for parking and it is also an environmentally-friendly program, which is pretty rare these days.

If it is absolutely necessary to at least pare down the program for financial reasons, perhaps you could only reduce the program to certain lines (say the 1, 2, 8 and 12) and only have it work Monday through Friday. Otherwise I see how people could take advantage of the system.

Thank you for taking this into consideration,

Alex Boisvert

48-1

Response to Comment Letter 48

E-mail from Alexander Boisvert, dated December 17, 2002

Response to Comment 48-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPin

From: Patlan, Richard
 Sent: Tuesday, December 17, 2002 5:30 PM
 To: EnvPin
 Cc: Mills, Stephen
 Subject: New comment on EIR website:

Datetime: Dec 16 2002 9:32PM

Name: boggs, jeff

Address: 3271 sepulveda Blvd #304

City: Los Angeles

State: CA

ZIP: 90034

Organization: dept of ge

Phone: 310313 6656

Email: jboggs@ucla.edu

Date Register: Dec 16 2002 9:31PM

Comment: It has come to my attention that, yet again for at least the third year in a row if I remember correctly, BruinGO has not been recommended as a permanent solution to traffic congestion caused by UCLA. This is perplexing. Please continue the BruinGO program. BruinGO is responsible for me switching over to permanent use of bus service to go to and from UCLA. I doubt that I am the only graduate student to do so. Furthermore, this program helps convert other auto-drivers into mass-transit riders, which further reduces air pollution in this smoggy city.

49-1

Response to Comment Letter 49

E-mail from Jeff Boggs, dated December 16, 2002

Response to Comment 49-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:33 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 2:12PM

Name: Bondurant, James

Address: 4222 Apricot Road

City: Simi Valley

State: CA

ZIP: 93063-2362

Organization:

Phone: 310825.1184

Email: bonduran@polisci.ucla.edu

Date Register: Dec 17 2002 2:11PM

Comment: The BRUINGO program should only continue as the budget will allow.

☐ 50-1

Response to Comment Letter 50

E-mail from James Bondurant, dated December 17, 2002

Response to Comment 50-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPin

From: Patlan, Richard
 Sent: Wednesday, December 18, 2002 9:25 AM
 To: EnvPin
 Cc: Mills, Stephen
 Subject: New comment on EIR website:

Datetime: Dec 17 2002 9:19PM

Name: Brooks, Leah

Address: 1867 1/2 Kelton Ave.

City: Los Angeles

State: CA

ZIP: 90025

Organization: UCLA

Phone:

Email: lfbrooks@ucla.edu

Date Register: Dec 17 2002 9:04PM

Comment: I am in favor of extending the Bruin GO program as part of the master plan. Any long-term transportation plans at the campus will eventually include non-car transit; not encouraging students and staff to use this option now is only postponing and making more difficult the inevitable.

51-1

Response to Comment Letter 51

E-mail from Leah Brooks, dated December 17, 2002

Response to Comment 51-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPin

From: Patlan, Richard
 Sent: Wednesday, December 18, 2002 9:24 AM
 To: EnvPin
 Cc: Mills, Stephen
 Subject: New comment on EIR website:

Datetime: Dec 17 2002 8:24PM

Name: Brown, Danielle

Address: 3280 Sawtelle Blvd

City: Los Angeles

State: CA

ZIP: 90066

Organization:

Phone: 310391-2153

Email: brownd@2004.law.ucla.edu

Date Register: Dec 17 2002 8:23PM

Comment: BruinGo has been extremely useful to me during my time at UCLA. I ride the Big Blue Bus everyday to and from school and have done so for the past year and a half. If the program is discontinued, I'm not sure how I will get to school, but it will likely involve applying for parking and driving to school. I know many other students who also ride the bus and would be much less likely to do so if BruinGo is discontinued.

52-1

Response to Comment Letter 52

E-mail from Danielle Brown, dated December 17, 2002

Response to Comment 52-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:37 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 5:29PM
Name: Buchanan, Matt
Address: 1164 Wellesley Ave. 303
City: Los Angeles
State: CA
ZIP: 90049

Organization: Law School

Phone:

Email: buchanan2005@student.law.ucla.edu

Date Register: Dec 17 2002 5:29PM

Comment: Continue BruinGo Bus Transportation Program --

I am writing to encourage you to consider keeping the BruinGo Bus subsidy program in place for the coming years, especially for STUDENTS. After reading through your EIR, I must say that I am astonished that you plan to discontinue the program for faculty and staff and even worse, you make no mention of the program for STUDENTS. I'm sorry but your choice to ignore STUDENTS, the life-blood of the university, is a grievous error on your part. Further, your proposal to cancel such a program is poorly thought-out and SHORTSIDED -- considering only the bottom line but not the growing California and UCLA population along w/ limited space. The fact is that the program has reduced student driving by 33% -- a number which would surely discontinue if the program is eliminated -- this means less parking for everyone, more pollution for our environment, more dangerous streets for pedestrians, and more traffic accidents. I for one, along w/ thousands of other students, would turn to driving every day b/c it would be a cheaper alternative for me in terms of overall opportunity cost. On the other hand, with the program in place, thousands of students have been able to make the choice to use public transportation. Please continue the BruinGo program for students of UCLA!

53-1

Response to Comment Letter 53

E-mail from Matt Buchanan, dated December 17, 2002

Response to Comment 53-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program and Response to Comment 41-1.

EnvPin

From: Patlan, Richard
 Sent: Wednesday, December 18, 2002 9:25 AM
 To: EnvPin
 Cc: Mills, Stephen
 Subject: New comment on EIR website:

Datetime: Dec 18 2002 12:18AM

Name: Bullock, Michael

Address: 624 S Berendo St Apt 303

City: Los Angeles

State: CA

ZIP: 90005

Organization: UCLA

Phone: 213382-4144

Email: mbullock@mednet.ucla.edu

Date Register: Dec 18 2002 12:17AM

Comment: I would like to recommend that UCLA make the BruinGO program permanent. Westwood is a highly congested area lacking affordable parking to handle the capacity needs of both UCLA and the surrounding businesses.

As an UCLA staff member, I find it financially impossible to pay monthly parking fees. I now take the bus, which has proven not only to save me money, but actually shorten the commute into (and find parking in) Westwood.

When I look at comparable institutions, such as USC, I am embarassed by the number of commuter/mass transit programs that are offered to UCLA's faculty/staff/students.

54-1

Response to Comment Letter 54

E-mail from Michael Bullock, dated December 18, 2002

Response to Comment 54-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
 Sent: Tuesday, December 17, 2002 5:32 PM
 To: EnvPln
 Cc: Mills, Stephen
 Subject: New comment on EIR website:

Datetime: Dec 17 2002 10:19AM

Name: Buu, MyMy

Address: 1727 Glendon Ave.

City: Los Angeles

State: CA

ZIP: 92708

Organization:

Phone:

Email: meems@ucla.edu

Date Register: Dec 17 2002 10:19AM

Comment: I am just one of the many examples of students who are taking the bus instead of purchasing a permit and parking on campus. I chose not to purchase a permit because travelling by bus has many advantages. First, it creates less pollution since I would be driving my car alone. Second, it is more efficient to take the bus because it is faster to take the bus to school, then to fight the traffic in Westwood and find a parking spot in the overcrowded Lot 8. Currently, there is a concern about how to fund for BruinGo, however, with my spot, which I would have used, is generating money by either daily sales or a long term permit. That money should be used toward BruinGo. The conclusions of the EIR report do not equate to the results I see day to day. A growing number of people are taking the bus to campus. The busses are more crowded. How is it possible that the bus load is not making an impact on the traffic in Westwood. If traffic in Westwood is already bad now, it will be much worse if BruinGo was to be ended. I definitely think BruinGo should continue. It is an asset to the transportation options available to the students and staff of UCLA. It is one of the best ideas that have been created to alieve the traffic around UCLA.

55-1

Response to Comment Letter 55

E-mail from MyMy Buu, dated December 17, 2002

Response to Comment 55-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program. The comment does not provide any evidence to support the contention that a parking space that is no longer utilized by a BruinGo participant results in "new" income that can be used to support the BruinGo program. Refer also to Response to Comment 30-12.

Because of continued parking demand, on-campus parking lots are still fully utilized, and thus the costs of maintaining parking spaces and administering the parking permit system have not declined. The cost of parking permits is intended to fully cover the costs of the parking system, including alternative transportation programs. Thus, the sale of annual, quarterly, or daily permits is intended to cover the costs of the parking system and related transportation programs. To date, this has included the cost of the BruinGo pilot program.

EnvPln

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:24 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 8:04PM
Name: Campion, Mike
Address: 1514 18th Street
City: Santa Monica
State: CA
ZIP: 90403
Organization: Law
Phone: 31012343542
Email: campion2005@student.law.ucla.edu

Date Register: Dec 17 2002 8:03PM

Comment: I understand that your study does not recommend continuing BruinGo as an alternative to commuting by car. I cannot imagine how you can recommend not continuing the program because of its "limited potential to reduce total parking demand." The bus I take every day is full of UCLA students. Can we park in your space?

While I understand that these reports are produced because certain powers have decided what they desire already, but, in addition to running counter to the analysis of the Institute for Traffic Studies it demonstrates a substantial disregard for the convenience and finances of your student body.

-Michael Campion, JD 2005

56-1

Response to Comment Letter 56

E-mail from Mike Campion, dated December 17, 2002

Response to Comment 56-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
 Sent: Tuesday, December 17, 2002 5:32 PM
 To: EnvPln
 Cc: Mills, Stephen
 Subject: New comment on EIR website:

Datetime: Dec 17 2002 10:22AM
 Name: Chan, Winston
 Address: 623 Alhambra Road
 City: San Gabriel
 State: CA
 ZIP: 91775

Organization:
 Phone: 626319-2919
 Email: hiuchungchan@yahoo.com

Date Register: Dec 17 2002 10:21AM

Comment: The BruinGo Program should be absolutely continued not because of the following reasons. Number 1, the program decrease the number of people commute everyday from their apartment to school, lowering the already over-burdened parking of the campus. Number 2, the BruinGo program can increase the bonding and solidarity among the students. As we may know, UCLA has one of the most diverse student population in the nation, and the students come from every part of the nation and world. Riding on the same bus everything, in my opinion, can at least create a chance for student interaction, and promote bonding between them.

57-1

By the way, who are the scholars who do the reaserach and conclude that the BruinGo Program should not be continued? Are they igerant nor not, or they are just trapped in the ivory tower? Can't they see the traffic congestion created by the single drivers and the ridiculous situation in the parking structures. Students have to wait for 30, or even a hour to get a parking space, even though they have a regular permit. Those researchers only look at the statistics, then concluding this. I would suggest that they should go out of the comfortable office and take a walk outside, to see what is really happening in the outside world! I just could not stand these bunch of "researchers" ruin the wonderful program. I am out.....

Response to Comment Letter 57

E-mail from Winston Chan, dated December 17, 2002

Response to Comment 57-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program. The University acknowledges that using transit to commute to campus may increase interaction among students.

EnvPln

From: Patlan, Richard
 Sent: Tuesday, December 17, 2002 5:36 PM
 To: EnvPln
 Cc: Mills, Stephen
 Subject: New comment on EIR website:

Datetime: Dec 17 2002 4:09PM
 Name: Chavoya, Rosemary
 Address: 2702 11th St., #1
 City: Santa Monica
 State: CA
 ZIP: 90405
 Organization: Psychology
 Phone: 310392-141252618
 Email: chavoya@psych.ucla.edu
 Date Register: Dec 17 2002 4:08PM

Comment: I strongly support the continuation of the BruinGO! program. I have been coming to the UCLA campus for over 25 years as either a student or an employee and I find myself taking the Big Blue Bus from my home in Santa Monica about 25% of the time since the program began rather than driving in. For the first 15 of those 25 yrs. I was a SM Bus rider. I began driving to campus when my job responsibilities increased and i had a less predictable schedule. I truly believe it has been an incentive for me to have the BruinGO! program available and will probably reduce my rides if the program disappears.

58-1

Response to Comment Letter 58

E-mail from Rosemary Chavoya, dated December 17, 2002

Response to Comment 58-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:25 AM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 10:22PM

Name: Chow, Tammy

Address: 1640 Barry Ave. #4

City: Los Angeles

State: CA

ZIP: 91011

Organization:

Phone: 310571-0230

Email: chow2005@student.law.ucla.edu

Date Register: Dec 17 2002 10:22PM

Comment: I think BruinGo is absolutely vital to the UCLA community! With parking being so sparse, I think it is only fair for UCLA to provide us with a (free) alternative. Since there is really no more space for additional parking lots, BruinGo is the smart and right thing to do.

59-1

Response to Comment Letter 59

E-mail from Tammy Chow, dated December 17, 2002

Response to Comment 59-1

As noted in the 2002 LRDP Draft EIR (Volume 1, page 4.13-18):

The 1990 LRDP established a limit of 25,169 parking spaces to limit the generation of vehicle trips and balance the need to accommodate vehicle trips to campus and promote alternative transportation modes, as encouraged by the campus's TDM program.

Refer also to the discussion of Impact LRDP 4.13-10 (Volume 1, pages 4.13-88 to 4.13-90), which indicates that implementation of the 2002 LRDP would not result in an inadequate parking capacity.

Refer also to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:23 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 9:45PM
Name: Christensen, Stephanie
Address: 408 S Cochran Ave
City: LA
State: CA
ZIP: 90036

Organization: Law School

Phone:

Email: christensen@2004.law.ucla.edu

Date Register: Dec 17 2002 9:45PM

Comment: In my two years at UCLAW, I have greatly depended on the BruinGo program to mitigate my parking needs.
Please do not discontinue it.

60-1

Response to Comment Letter 60

E-mail from Stephanie Christensen, dated December 17, 2002

Response to Comment 60-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:24 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 7:46PM

Name: Chu, Julia

Address: 17640 Lassen St. #15

City: Northridge

State: CA

ZIP: 91325

Organization:

Phone: 310794-5125

Email: juliachu@ucla.edu

Date Register: Dec 17 2002 7:45PM

Comment: I highly recommend that UCLA should make BruinGo a permanent feature to facilitate the UCLA faculty, staff and students' commute through the notorious LA traffic. Imagine how many potential cars driven by UCLA staff, faculty and students in the West LA areas on the road are reduced by the BruinGo buses! As part of the community, UCLA parking services should continue making BruinGo available to not only ease the mundane commute for our UCLA employees/students but also to reduce the traffic congestion for the people in the nearby communities.

61-1

Response to Comment Letter 61

E-mail from Julia Chu, dated December 17, 2002

Response to Comment 61-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
 Sent: Tuesday, December 17, 2002 5:34 PM
 To: EnvPln
 Cc: Mills, Stephen
 Subject: New comment on EIR website:

Datetime: Dec 17 2002 1:17PM
 Name: chung, julie
 Address: 1375 midvale ave.
 City: los angeles
 State: CA
 ZIP: 90024

Organization:
 Phone: 310473 3843.
 Email: jhchung@ucla.edu

Date Register: Dec 17 2002 1:16PM

Comment: I have heard that the BruinGo program may not continue its services for UCLA staff and students. I am extremely concerned because BruinGo is my main source of transportation along with many other students at UCLA. It is hard enough to get a parking permit as well as costly to obtain one. BruinGo is very convenient for those who do not own a car and for those who live far off from campus. BruinGo is a service to many students and staff. If the program is cancelled, it will leave many students stranded who have no sources to find transportation. I would appreciate it if BruinGo could continue to operate.

62-1

Sincerely,
 Julie Chung

Response to Comment Letter 62

E-mail from Julie Chung, dated December 17, 2002

Response to Comment 62-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:34 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 12:11PM
Name: Clevenger, Jason
Address: 12415 Texas Ave. #10
City: Los Angeles
State: CA
ZIP: 90025
Organization: UCLA
Phone: 310794-5774
Email: jclev@ee.ucla.edu

Date Register: Dec 17 2002 12:10PM

Comment: I would like to suggest that BruinGo be considered as a long-term solution to campus parking problems at UCLA. Considering the statistics that the UCLA traffic consultant and the UCLA Institute of Transportation Studies have presented, it is obvious that this program has made an impact on the severe campus parking shortage (not to mention environmentally). I, for one, use the Big Blue Bus to get to campus because of the extremely limited availability of campus parking.

63-1

The only reason I would suspect that your long-range development plan does not include continuation of BruinGo is consideration of the enormous parking fees that UC will accumulate by forcing more students, faculty, and staff to park on campus. This is not a time to be greedy, when our dependence on foreign oil is at an all-time high. We should be reducing our use of personal vehicles, for the good of the planet.

Thank you,
Jason M. Clevenger

Response to Comment Letter 63

E-mail from Jason Clevenger, dated December 17, 2002

Response to Comment 63-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program. The cost of parking permits is intended to fully cover the costs of the parking system, including alternative transportation programs. To date, this has included the cost of the BruinGo pilot program.

EnvPln

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:25 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 10:22PM

Name: Cohen, Jeff

Address: 11728 Wilshire Blvd, Apt 1104B

City: Los Angeles

State: CA

ZIP: 90025

Organization:

Phone:

Email: cohen2005@student.law.ucla.edu

Date Register: Dec 17 2002 10:22PM

Comment: The BruinGo Program (Big Blue Bus) was critical to my choice of a law school.

The fact is that without an easy, free transportation option, I would not have been as likely to attend law school in Los Angeles. We all know that the parking situation on campus is a problem, and I certainly hope the number of students driving to campus can be reduced even more. But I am writing to tell you that without the free bus program, I would not want to go to school here.

We are a university full of astoundingly intelligent and creative people. Can't we think of a better solution to reducing parking demand than abolishing such an important program?

64-I

Response to Comment Letter 64

E-mail from Jeff Cohen, dated December 17, 2002

Response to Comment 64-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:34 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 12:36PM

Name: Cyr, Darin

Address: 11162 Massachusetts Ave Apt 12

City: West Los Angeles

State: CA

ZIP: 90025

Organization:

Phone:

Email: dcyr@ucla.edu

Date Register: Dec 17 2002 12:36PM

Comment: BruinGo is the best program for students at UCLA. It is close to impossible to get parking at or near the UCLA campus, but BruinGo allows students, who would not qualify for parking, a way to get to school. It is shocking to me that a program that positively affects the lives of so many students would be considered for cancellation. It is obvious that the administration is not really looking out for the interests of the students, which makes no sense at all because without the many students at UCLA there would not be a UCLA. I think that many administrators need to realize whom the college is supposed to be serving, and reevaluate their priorities. Hopefully this will allow a program that has had the most positive effect on my life, while I have been at UCLA, to continue to serve others in the future.

65-1

Response to Comment Letter 65

E-mail from Darin Cyr, dated December 17, 2002

Response to Comment 65-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:32 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 9:21AM
Name: Czaja, Andy
Address: UCLA, 5676 Geology Building
City: Los Angeles
State: CA
ZIP: 90095-1567
Organization: Dept. of E
Phone:
Email: aczaja@ess.ucla.edu
Date Register: Dec 17 2002 9:20AM

Comment: I have been a graduate student at UCLA for just over 2 years and have been riding the Santa Monica Big Blue Bus to school the whole time, and I believe that the BruinGo program should be continued. I have seen more and more students using the bus over these 2 years which leads me to believe that there must be at least some alleviation of the parking problem here on campus. Also, the fact that the bus company has added a new line (#16) which is a UCLA commuter bus is further evidence of the program's success and usefulness.

Thank you for this opportunity to make our voices heard.

Sincerely,
Andy Czaja
UCLA Graduate Student

66-1

Response to Comment Letter 66

E-mail from Andy Czaja, dated December 17, 2002

Response to Comment 66-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPin

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:24 AM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 18 2002 8:15AM

Name: Daily, Jess

Address: 3972 Albright Av.

City: LA

State: CA

ZIP: 90066

Organization: UPTE

Phone: 3108058027

Email: jdaily@tft.ucla.edu

Date Register: Dec 18 2002 8:14AM

Comment: Please continue Bruin Go. Its a great incentive for not taking your car to campus.

67-1

Response to Comment Letter 67

E-mail from Jess Daily, dated December 18, 2002

Response to Comment 67-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:27 AM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 18 2002 8:47AM

Name: Dandekar, Sugandha

Address: 3234 Sawtelle Blvd

City: Los Angeles

State: CA

ZIP: 90066

Organization:

Phone: 310825-5488

Email: uma@ucla.edu

Date Register: Dec 18 2002 8:46AM

Comment: I think there is something wrong in the calculations as to how many people use the blue bus. I travel on the bus frequently and have noticed in the mornings and evenings that there are more riders using Bruin card than not. In my opinion Bruin Go should continue without interruption!

68-1

Response to Comment Letter 68

E-mail from Sugandha Dandekar, dated December 18, 2002

Response to Comment 68-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:24 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 8:41PM
Name: Danfoura, Samer
Address: 3670 Glendon Ave. #222
City: Los Angeles
State: CA
ZIP: 90034

Organization:
Phone:
Email: danfoura@2003.law.ucla.edu

Date Register: Dec 17 2002 8:41PM

Comment: BruinGo is an excellent program. I personally stopped driving to school because it went into effect and have not driven to school since. In an effort to increase the number of shared-ride commuters, UCLA should certainly be subsidizing bus fair for students, faculty and staff.

69-1

Thanks for the program. Keep it going!
Samer Danfoura

Response to Comment Letter 69

E-mail from Samer Danfoura, dated December 17, 2002

Response to Comment 69-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:31 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 8:44AM
Name: Decker, Christopher
Address: 3251 S Sepulveda Blvd. #207
City: Los Angeles
State: CA
ZIP: 90034

Organization:

Phone:

Email: decker@2003.law.ucla.edu

Date Register: Dec 17 2002 8:44AM

Comment: I recommend making BruinGo permanent. I have commuted to school entirely by bus for the three years of law school and I know several classmates who do as well. Seeing classmates on the bus on the way to and from school promotes community. Of course, many people drive to campus, but this is at least partly due to the local "car culture" in which people simply fail to give serious consideration to any alternative means of transportation. I have noticed that the largest (and the ugliest) buildings on campus are parking structures, and that cars circulate on this campus far more than they do on any other campus I am familiar with. I think the University should fund BruinGo rather than parking expansion as a way of discouraging people from driving to campus, even if that is what they would prefer to do. The end result will be a campus that is more beautiful, and a school community where people know each other better, which is ultimately a more productive and desirable place to work and learn.

70-1

Christopher Decker
Third-year law student

Response to Comment Letter 70

E-mail from Christopher Decker, dated December 17, 2002

Response to Comment 70-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program. The University acknowledges that using transit to commute to campus may increase interaction among classmates. However, there is no evidence if the BruinGo program was discontinued, the opportunity for such interaction would be eliminated.

EnvPin

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:36 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 5:13PM

Name: Delp, Linda

Address: 1237 Franklin St. #5

City: Santa Monica

State: CA

ZIP: 90404

Organization: UCLA

Phone: 310794 5976

Email: ldelp@ucla.edu

Date Register: Dec 17 2002 5:13PM

Comment: I was disturbed to find out that BruinGo is not recommended as a permanent program to help with traffic and transportation issues on campus. I think it is critical that UCLA play a lead role in encouraging alternative modes of transportation. As a BruinGo user, I can attest to the fact that BruinGo makes it easier to use the bus system to commute to UCLA. I hope you will reconsider your recommendations.

71-1

Response to Comment Letter 7I

E-mail from Linda Delp, dated December 17, 2002

Response to Comment 7I-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:31 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 4:50PM
Name: Doherty, Joseph
Address: 405 Hilgard Avenue
City: Los Angeles
State: CA
ZIP: 90095-1476
Organization: UCLA Schoo
Phone:
Email: doherty@law.ucla.edu

Date Register: Dec 17 2002 4:50PM

Comment: I am an occasional user of BruinGO. It's a terrific program and gets me out of my car when I would otherwise drive. I am surprised that a recommendation has been made to end it. That seems counterproductive to the goal of getting cars off of campus.

72-1

Response to Comment Letter 72

E-mail from Joseph Doherty, dated December 17, 2002

Response to Comment 72-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:26 AM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 18 2002 8:14AM

Name: Doran, Charles

Address: 1248 1/2 25th St.

City: Santa Monica

State: CA

ZIP: 90404

Organization: UCLA - Pub

Phone: 310825-5147

Email: chas@ucla.edu

Date Register: Dec 18 2002 8:13AM

Comment: I highly recommend that you continue the BruinGo program. It seems shortsighted to close this program when anything to reduce traffic congestion at UCLA, and in Los Angeles in general, is needed.

Please do not make any decisions without having independent consultants evaluate this program. Naturally Parking Services will do anything they can to increase their revenues. It would be inconsistent for them to support a program like BruinGo.

73-1

Response to Comment Letter 73

E-mail from Charles Doran, dated December 18, 2002

Response to Comment 73-1

To evaluate the first year of the pilot program, the University retained independent consultants (Crain & Associates). Any future analysis will also be conducted by independent consultants. Refer also to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:34 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 1:08PM
Name: dorsey, michael
Address: 1558 s sierra bonita ave
City: los angeles
State: CA
ZIP: 90019

Organization: fowler mus
Phone: 323931-6646
Email: mdorseyj@ucla.edu

Date Register: Dec 17 2002 1:08PM

Comment: i think bruingo is an exceptional program. i used it while i went here and i use it for work sometimes. please
keep it in effect as long as you can. thanks

74-1

Response to Comment Letter 74

E-mail from Michael Dorsey, dated December 17, 2002

Response to Comment 74-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:26 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 18 2002 8:08AM

Name: DuVernois, Carol

Address: 2505 4th St apt 211

City: SAnTa MOnica

State: CA

ZIP: 90405

Organization: ucla econo

Phone: 310825 1011

Email: duvernoi@econ.ucla.edu

Date Register: Dec 18 2002 8:08AM

Comment: Please continue to provide the BruinGo! program. This is a valuable benefit to me and many other staff members here at UCLA. Losing BruinGo would be like getting a paycut, and I cannot afford it! Please do not penalize those of us who choose to ride the bus. I could drive, (I have a vehicle,) but the bus is convenient, and parking here is terrible! By discontinuing the program, the traffic and parking will be even worse. Please reconsider the plan to discontinue BruinGo.

75-1

Response to Comment Letter 75

E-mail from Carol DuVernois, dated December 18, 2002

Response to Comment 75-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:23 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 6:08PM
Name: Ehrenfeucht, Renia
Address: 1226 N. Ogden Drive apt 7
City: West Hollywood
State: CA
ZIP: 90046

Organization:
Phone: 323848 8634
Email: reniae@ucla.edu

Date Register: Dec 17 2002 6:08PM

Comment: Please make BruinGo a permanent feature. Having subsidized bus fare is integral to making transportation around Los Angeles possible and affordable. Students like myself who do not have cars make decisions on whether to come to campus or do other education-related functions based on the cost of transportation. BruinGo is the first step at UCLA to make such transportation affordable and should be permanent.

76-1

Response to Comment Letter 76

E-mail from Renia Ehrenfeucht, dated December 17, 2002

Response to Comment 76-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:25 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 10:23PM

Name: Eidlin, Eric

Address: 1414 N. Sierra Bonita Ave.

City: Los Angeles

State: CA

ZIP: 90046

Organization:

Phone: 323851-0123

Email: eeidlin@ucla.edu

Date Register: Dec 17 2002 10:23PM

Comment: I strongly favor the indefinite continuation of the Bruin Go program. The program clearly provides an incentive to faculty and staff to ride public transit to campus. This results in better air quality on campus and eases the strain on our parking facilities.

As a student who lives to the east of campus, I cannot ride the Big Blue Bus to campus. In light of the considerable benefits that it brings to UCLA, I urge you not only to continue the existing program, but to expand it to include Culver City Bus and the MTA. The addition of these transit operators to the Bruin Go program would provide even greater benefits to the entire UCLA community.

77-1

Response to Comment Letter 77

E-mail from Eric Eidlin, dated December 17, 2002

Response to Comment 77-1

Refer to Section 4.13 of the 2002 LRDP Draft EIR (Volume 1, pages 4.13-16 to 18) for a discussion of the existing TDM program, which provides a range of viable commuting options that do not involve single-occupant vehicles. Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:35 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 4:45PM

Name: Eisenberg, Michael

Address: 1830 Kelton Ave #12

City: Los Angeles

State: CA

ZIP: 90025

Organization:

Phone: 310473-1153

Email: mike77@ucla.edu

Date Register: Dec 17 2002 4:45PM

Comment: The BruinGo is essential to everyone who commutes to UCLA. It should be kept permanently. It is extremely valuable to me. There is just no alternative mode of transportation for the many who do not get parking on campus.

78-1

Response to Comment Letter 78

E-mail from Michael Eisenberg, dated December 17, 2002

Response to Comment 78-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:27 AM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 18 2002 9:08AM
Name: Favell, Adrian
Address: Sociology, UCLA
City: LA
State: CA
ZIP: 90095
Organization: UCLA
Phone: 3108253840
Email: afavell@soc.ucla.edu
Date Register: Dec 18 2002 9:08AM
Comment: Dear UCLA planners:

It is ABSOLUTE DISGRACE that you are considering to scrap the Bruin GO bus subsidies programme, in favour of more cars and more parking on this campus. It is so patently obvious that schemes of this kind are the only way we can begin to reduce excessive car use here. As a foreign European, I have been positively surprised by the existence of the Bruin Go scheme, in tandem with the excellent Santa Monica Blue Bus system. It runs counter to many people's negative ideas about LA. Why on earth would you want to discontinue this service, in favour of private development, that will no doubt only profit private external contractors, and certainly lead to the further degrading of UCLA's once beautiful campus?

79-1

Adrian Favell
Associate Professor, Sociology, UCLA

Response to Comment Letter 79

E-mail from Adrian Favell, dated December 18, 2002

Response to Comment 79-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:35 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 1:55PM
Name: Fernandez, Kimberly
Address: 1666 Federal Avenue #6
City: West Los Angeles
State: CA
ZIP: 90025

Organization:

Phone: 310206-9979
Email: kimberlyf@college.ucla.edu

Date Register: Dec 17 2002 12:41PM

Comment: Have you read the report/study provided to you by your own traffic consultant, Crain & Associates? How can the University ignore the reduction in traffic - on all local levels - that has been provided by the BruinGo program? In a time when UCLA is trimming away at the budget, shouldn't the University and it's community be participating in cost saving measures, as well as those that have the most significant impact on the community? BruinGo has increased faculty/staff and student ridership of the Blue Bus, thus reducing the need for us to bring our (solo rider) cars to campus. It has reduced emissions and traffic and provides a safe and clean alternative to driving to campus in our own cars. And if you take a look at the BruinGo program study you will also see that there are several cost saving suggestions that could effect the traffic pattern to the UCLA campus. PLEASE BE RESPONSIBLE ABOUT THIS ENORMOUS ISSUE, AND DO NOT IGNORE THEM.

80-1

Response to Comment Letter 80

E-mail from Kimberly Fernandez, dated December 17, 2002

Response to Comment 80-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:36 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 5:04PM
Name: Foster, Suzanne
Address: 3525 Jasmine Ave. #14
City: Los Angeles
State: CA
ZIP: 90034

Organization:

Phone:

Email: suzycat18@yahoo.com

Date Register: Dec 17 2002 5:03PM

Comment: I recommend that the BruinGo transportation program for faculty, staff, and students be included in the long-range planning document. I use public transportation and believe BruinGo is an excellent way to reduce congestion on the UCLA campus.

81-1

Response to Comment Letter 81

E-mail from Suzanne Foster, dated December 17, 2002

Response to Comment 81-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:31 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 6:36AM

Name: Frank, Rebecca

Address: 3770 Keystone Ave #202

City: Los Angeles

State: CA

ZIP: 90034

Organization: UCLA

Phone: 310839-6331

Email: refrank@ucla.edu

Date Register: Dec 17 2002 6:35AM

Comment: BruinGo is an excellent program, and should definitely be continued. The traffic and parking around UCLA is terrible, even with the addition of new parking lots, and I think UCLA's money is better spent promoting alternate means of transportation. BruinGo reduced student parking demand by 33% and increased bus ridership by 43%. As parking fees continue to rise, more students will choose to leave their cars at home and take the bus. If UCLA's goal is to improve neighborhood congestion and make commuters' lives easier, providing free access to public transportation is essential. It is the responsible thing to do, both environmentally and economically.

82-1

Response to Comment Letter 82

E-mail from Rebecca Frank, dated December 17, 2002

Response to Comment 82-1

As noted in the 2002 LRDP Draft EIR, the University began to implement elements of the TDM program in 1984. Inclusion of PP 4.13-1(d) in the 2002 LRDP Draft EIR commits the University to continue the TDM program throughout the 2002 LRDP planning horizon and to meet the trip reduction and AVR (average vehicle ridership) requirements established by the South Coast Air Quality Management District (SCAQMD). Thus, the University will continue to expend funds to promote alternative means of transportation.

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program and Topical Response D (Bicycle Commuting Conditions and Facilities) for a discussion of TDM marketing.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:33 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 3:04PM

Name: Freeman, Jan

Address: 160 Haines

City: Los Angeles

State: CA

ZIP: 90095

Organization: African Am

Phone: 3102068009

Email: jfreeman@caas.ucla.edu

Date Register: Dec 17 2002 3:00PM

Comment: BruinGo is a great program. It should be continued.

83-1

Response to Comment Letter 83

E-mail from Jan Freeman, dated December 17, 2002

Response to Comment 83-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:23 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 5:33PM

Name: French, Susan

Address: 405 Hilgard

City: Los Angeles

State: CA

ZIP: 90095-1476

Organization:

Phone: 310206 7324

Email: french@law.ucla.edu

Date Register: Dec 17 2002 5:32PM

Comment: I have found Bruin Go useful for myself and that it is very helpful for students. I believe it has long-range potential for reducing increases in demand for parking on campus.

The EIR's rejection of BruinGO as a traffic mitigation measure is completely at odds with the evaluations of BruinGO conducted by UCLA's traffic consultant and by UCLA's Institute of Transportation Studies. These evaluations found that faculty/staff transit ridership for commuting to campus increased by 134 percent, and solo driving decreased by 9 percent during BruinGO's first year. Students' transit ridership for commuting to campus increased by 43 percent, and solo driving decreased by 33 percent.

84-1

Response to Comment Letter 84

E-mail from Susan French, dated December 17, 2002

Response to Comment 84-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:35 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 3:49PM

Name: Gaerlan, Barbara

Address: 11387 Bunche Hall

City: Los Angeles

State: CA

ZIP: 90095-1487

Organization: UCLA Cente

Phone: 310206-9163

Email: bgaerlan@international.ucla.edu

Date Register: Dec 17 2002 3:49PM

Comment: I am writing in support of continued funding for BruinGo. It is a wonderful program that should be expanded, not eliminated. With traffic and air pollution as bad as they are, UCLA should be leading the way in transportation planning. Supporting this easy and effective bus subsidy is an obvious way to do this.

I am a UCLA staff person who currently holds a parking permit, but who will be getting rid of my car in June. After that, I will be dependent on the bus for my transportation. Please consider this one more donation of a parking space to make it more affordable for UCLA to continue BruinGo.

85-1

Response to Comment Letter 85

E-mail from Barbara Gaerlan, dated December 17, 2002

Response to Comment 85-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:35 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 2:23PM

Name: galindo, moses

Address: 1242 Law School

City: los angeles

State: CA

ZIP: 90095

Organization: ucla law s

Phone: 310206-7610

Email: galindo@law.ucla.edu

Date Register: Dec 17 2002 2:23PM

Comment: Please continue the BruinGo program for students, faculty & staff. This program does a lot more than reduce parking demand. It alleviates traffic coming in and out of the westwood-area, is good for the environment, reduces harmful emissions from single-car drivers going to campus, and allows students and staff an affordable and stress-free way to get to and from campus without the hassle. Please keep BruinGo. And add the MTA and Culver City bus lines as well. Then you will see even greater benefits.

86-1

Response to Comment Letter 86

E-mail from Moses Galindo, dated December 17, 2002

Response to Comment 86-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:23 AM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 6:00PM

Name: garrow, eve

Address: 3181 S. Sepulveda Blvd, #302

City: Los Angeles

State: CA

ZIP: 90034

Organization: UCLA stude

Phone:

Email: egarrow@ucla.edu

Date Register: Dec 17 2002 5:59PM

Comment: I urge you to continue Bruingo. It has been convenient for me, and I would not use the bus system to commute to school if it were not for this program. Don't let this wonderful, innovative program go away.

87-1

Response to Comment Letter 87

E-mail from Eve Garrow, dated December 17, 2002

Response to Comment 87-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:32 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 9:13AM
Name: Ginsburg, Lev
Address: 11660 Texas Avenue #101
City: Los Angeles
State: CA
ZIP: 90025

Organization:

Phone:

Email: levbins@earthlink.net

Date Register: Dec 17 2002 9:12AM

Comment: Re: BruinGO program

It is absolutely necessary to continue the BruinGO system for both faculty and students.

As if it is not bad enough that UCLA has expanded its enrollment without similarly expanding the services available on campus (e.g., food service, classes, and materials), it has been woefully lacking in creating a practical parking situation on or near the campus.

BruinGO is one particularly effective remedy for these problems, and one that contributes to the local communities by decreasing vehicular traffic and getting people in the habit of using mass transit to get to campus each day.

Keeping cars off the streets of West Los Angeles is an absolute necessity. To the extent, if any, that BruinGO accomplishes this end, it should be cherished as a viable, practical alternative to forcing people into their cars and onto the roads.

Please continue subsidizing BruinGO indefinitely.

88-1

Response to Comment Letter 88

E-mail from Lev Ginsberg, dated December 17, 2002

Response to Comment 88-I

As noted in the 2002 LRDP Draft EIR (Volume 1, pages 4.13-88 to 4.13-92), implementation of the 2002 LRDP would not result in inadequate parking capacity. Since implementation of the Transportation Demand Management program, the supply of parking has been maintained so as to balance supply with the need to encourage the use of alternative transportation modes. The components of the existing TDM program, which provide alternatives to solo-occupant vehicles, were described in the 2002 LRDP Draft EIR.

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:36 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 5:22PM

Name: Gordon, Jared

Address: 1223 20th #104

City: Santa Monica

State: CA

ZIP: 90404

Organization:

Phone: 3104532494

Email: gordonj@2003.law.ucla.edu

Date Register: Dec 17 2002 5:22PM

Comment: I am a frequent user of BruinGo, and know dozens of others who are also frequent users. One misinterpretation of the data that I often see UCLA administrators make in their evaluation of BruinGo is their belief that it should be evaluated based on parking applications. I, like many other users, would prefer to park on campus, and even applied to get parking, but did not receive it. BruinGo is the alternative I chose after failing to get parking. So, rather than judge BruinGo based on parking applications, it should be assessed as if it was a hierarchical preferred choice, by examining the total ridership and the effect on UCLA and non-UCLA parking usage. Only usage measures can accurately measure the effectiveness of this program, given its nature as a substitute for parking, rather than a preferred means of transportation.

89-1

Response to Comment Letter 89

E-mail from Jared Gordon, dated December 17, 2002

Response to Comment 89-I

The University acknowledges that the utilization of BruinGo may be substantially affected by whether an individual is successful in obtaining a parking permit and that determining how transit ridership relates to parking demand is complicated. Refer also to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:26 AM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 18 2002 8:38AM

Name: Gorter, Timothy

Address: 1328 Harvard St. #B

City: Santa Monica

State: CA

ZIP: 90404

Organization:

Phone:

Email: tgorter@ucla.edu

Date Register: Dec 18 2002 8:37AM

Comment: I ride the bus to school frequently. BruinGo is an excellent program that should not be stopped. I come from another university town (Santa Cruz) that has had similar program in place for a longer amount of time and there it works beautifully. The student ridership must be over 75%. Keep BruinGo. Even think to provide additional incentives to staff and students who use it - like a reduction in student fees and staff transportation bonuses. It's cheaper than building more parking structures!!

90-1

Response to Comment Letter 90

E-mail from Timothy Gorter, dated December 18, 2002

Response to Comment 90-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:32 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 3:58PM
Name: Greenberger, Martin
Address: 629 Alta Avenue
City: Santa Monica
State: CA
ZIP: 90402

Organization:
Phone: 301825-7770
Email: mg@ucla.edu

Date Register: Dec 17 2002 3:57PM

Comment: I am a strong supporter of the BruinGO program. I use the bus regularly instead of driving to UCLA and using the parking structures at UCLA. I would be very unhappy to see BruinGO discontinued.

91-1

Response to Comment Letter 9I

E-mail from Martin Greenberger, dated December 17, 2002

Response to Comment 9I-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:33 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 12:00PM

Name: gu, fang

Address: 11130 rose ave.#104

City: los angeles

State: CA

ZIP: 90034

Organization: UCLA

Phone: 3108259748

Email: fanggu@ucla.edu

Date Register: Dec 17 2002 11:58AM

Comment: I recommend that UCLA should make BruinGO permanent.

92-1

Response to Comment Letter 92

E-mail from Fang Gu, dated December 17, 2002

Response to Comment 92-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

EnvPln

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:26 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 18 2002 7:55AM
Name: Guilds, Rick
Address: 1367 S. Sierra Bonita
City: LA
State: CA
ZIP: 90019
Organization: UCLA - SPD
Phone: 310206-5033
Email: rguilds@mednet.ucla.edu
Date Register: Dec 18 2002 7:54AM
Comment: My request is simple,.....please continue the GO BRUIN PROGRAM.

I commute to UCLA everyday, and traffic is constantly getting WORSE.

Continuing the GO BRUIN Program will not only benefit the staff and students,...it will also help fellow Los Angeles residents as well. Even eliminating 1 car from polluting the environment is a help. Please help us and our environment.

93-1

Response to Comment Letter 93

E-mail from Rick Guilds, dated December 18, 2002

Response to Comment 93-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Wednesday, December 18, 2002 9:25 AM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 9:53PM

Name: Hayashi, Natalie

Address: 11959 Gorham Ave. #6

City: Los Angeles

State: CA

ZIP: 90049

Organization:

Phone:

Email: hayashi@2003.law.ucla.edu

Date Register: Dec 17 2002 9:53PM

Comment: Please continue the BruinGo program. I am in my seventh year at UCLA - 4 as an undergraduate, from 1993-97, and 3 as a law student, from 2000-03. In deciding to return to UCLA for graduate school, and in deciding where to live, parking was a major concern. In the context of unreasonably high rates for sparsely located parking meters, and the frustration that occurs when daily parking passes are sold out before 7:30am on any given weekday, free service on the Santa Monica Bus system is the only positive development I have seen from the parking and transportation department at UCLA. It's a gesture from UCLA that means a lot, that shows that UCLA is at least attempting to address the daily stress most students face in simply trying to get to and from campus on a daily basis.

94-1

Response to Comment Letter 94

E-mail from Natalie Hayashi, dated December 17, 2002

Response to Comment 94-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:31 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 8:01AM

Name: Hernandez, Ebelia

Address: 3861 Vinton Ave #205

City: Culver City

State: CA

ZIP: 90232

Organization:

Phone:

Email: ebelia@english.ucla.edu

Date Register: Dec 17 2002 8:00AM

Comment: Instead of canceling the BruinGo program, UCLA should expand it to include the MTA and Culver City bus lines. A lot of students and staff (including myself) would love the idea of not having to pay for gas and parking—but we don't live close enough to a blue bus line. I used to take the blue bus to work, and it was heaven! Just imagine how many more students and staff would gladly give up their parking passes!

95-1

Response to Comment Letter 95

E-mail from Ebelia Hernandez, dated December 17, 2002

Response to Comment 95-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:34 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 3:09PM
Name: Hernandez-Leon, Ruben
Address: 827 Levering #302
City: Los Angeles
State: CA
ZIP: 90024

Organization: UCLA
Phone: 310825-3059
Email: rubenhl@soc.ucla.edu

Date Register: Dec 17 2002 3:06PM

Comment: Please continue the BruinGO program. It is absolutely essential to improve traffic and congestion problems.

Ruben Hernandez-Leon

96-1

Response to Comment Letter 96

E-mail from Ruben Hernandez-Leon, dated December 17, 2002

Response to Comment 96-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:31 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 1:52AM

Name: Hill, Juniper

Address: 8541 Calmada Ave.

City: Whittier

State: CA

ZIP: 90605

Organization: UCLA Depar

Phone:

Email: Jhill@wesleyan.edu

Date Register: Dec 17 2002 1:52AM

Comment: I strongly feel that is important to continue the Bruin Go program. This program has proved successful in encouraging students, faculty, and staff to increase their use of public transportation, which helps to relieve local traffic congestion and overcrowding of parking structures on campus, as well as benefiting the environment.

97-1

Response to Comment Letter 97

E-mail from Juniper Hill, dated December 17, 2002

Response to Comment 97-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:31 PM
To: EnvPin
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 8:02AM

Name: Hills, Alison

Address: 414 Howland Canal

City: Venice

State: CA

ZIP: 90291

Organization: UCLA

Phone: 310822-6096

Email: alisonhills@earthlink.net

Date Register: Dec 17 2002 8:01AM

Comment: As a graduate student, I depend on the BruinGo program to commute to UCLA. Without this program, taking the bus would not be an economic alternative to driving. If taking the bus was not free, instead of spending money on the bus, I would spend the money on parking. I know that other graduate students would make the same choice. BruinGo is an invaluable program that reduces student driving to campus. It must be continued.

98-1

Response to Comment Letter 98

E-mail from Alison Hills, dated December 17, 2002

Response to Comment 98-I

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.

From: Patlan, Richard
Sent: Tuesday, December 17, 2002 5:31 PM
To: EnvPln
Cc: Mills, Stephen
Subject: New comment on EIR website:

Datetime: Dec 17 2002 7:58AM

Name: Hiro, Molly

Address: 10751 1/2 Missouri

City: Los Angeles

State: CA

ZIP: 90025

Organization:

Phone:

Email: mhiro@ucla.edu

Date Register: Dec 17 2002 7:57AM

Comment: I am writing to ask you to consider making BruinGo a permanent program. Subsidizing public transportation is a key long-term investment in the future of traffic reduction and environmental protection. I have been an avid user of BruinGo since the program began and believe that I and many other users would be less inclined to take the bus without the program. Thank you Molly Hiro

99-1

Response to Comment Letter 99

E-mail from Molly Hiro, dated December 17, 2002

Response to Comment 99-1

Refer to Topical Response A (BruinGo Program) for a discussion of the BruinGo program.