

# **Hilgard Faculty Housing Project**

## **Draft Initial Study/Mitigated Negative Declaration**

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

January 2020

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**HILGARD FACULTY HOUSING  
UNIVERSITY OF CALIFORNIA, LOS ANGELES**

**Project No. 943703.01**

**Initial Study and Environmental Checklist Form**

**I. PROJECT INFORMATION**

**1. PROJECT TITLE**

Hilgard Faculty Housing

**2. LEAD AGENCY NAME AND ADDRESS**

The University of California Board of Regents  
1111 Franklin Street, 12<sup>th</sup> Floor  
Oakland, California 94607

**3. CONTACT PERSON AND PHONE NUMBER**

Kathy FitzGerald, Director, Project Development  
University of California, Los Angeles  
Capital Programs, Capital Planning and Finance  
1060 Veteran Avenue  
Los Angeles, California 90095-1365  
(310) 206-5939

**4. PROJECT LOCATION**

Hilgard Avenue and Lindbrook Drive  
Los Angeles, California 90024  
(Refer to Figures 1 and 2)

**5. PROJECT SPONSOR'S NAME AND ADDRESS**

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

**6. CUSTODIAN OF THE ADMINISTRATIVE RECORD FOR THIS PROJECT**

Same as listed under No. 3 above.

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

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

of Regents (The Regents) in January 2018 (UCLA 2018).<sup>1</sup> However, pursuant to Section 15150 of the State CEQA Guidelines, the LRDP Amendment (2017) Final SEIR is hereby incorporated by reference, primarily for the discussion of regional environmental setting and relevant planning documents. The LRDP Amendment (2017) Final SEIR is located at the address listed under No.3 above and at <http://www.capitalprograms.ucla.edu/Planning/LongRangeDevelopmentPlan> for inspection.

## **Introduction**

The California Environmental Quality Act (CEQA) requires that government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. Therefore, in accordance with CEQA (Public Resources Code §§21000 et seq., specifically, §21094), the CEQA Guidelines (14, California Code of Regulations [CCR], §§15000 et seq.), and the University of California Procedures for the Implementation of CEQA, this Initial Study (IS) has been prepared as documentation for a Mitigated Negative Declaration (MND) to analyze the potential environmental effects of the proposed Hilgard Faculty Housing Project (Project). This IS/MND includes a description of the proposed Project and location of the Project site, evaluation of the potential environmental impacts of Project implementation, and recommended mitigation measures to lessen or avoid impacts on the environment.

Because the Project site is not located on the UCLA campus, this IS was not tiered from the LRDP Amendment (2017) Final SEIR. However, as noted above, pursuant to Section 15150 of the State CEQA Guidelines, the LRDP Amendment (2017) Final SEIR is hereby incorporated by reference, primarily for the discussion of regional environmental setting and relevant planning documents. Also, in conjunction with certification of the LRDP Amendment (2017) Final SEIR and approval of the LRDP Amendment (2017) and Student Housing Projects, The Regents adopted a Mitigation Monitoring and Reporting Program (MMRP). The MMRP ensures that mitigation measures that are the responsibility of the University of California are implemented in a timely manner. This IS identifies campus programs, procedures, and practices (PPs), and mitigation measures (MMs) from the LRDP Amendment (2017) Final SEIR MMRP that would reduce potential impacts of the proposed Project and includes new MMs identified to reduce Project-specific environmental impacts to a less than significant level, where applicable. These PPs and MMs have been incorporated into the proposed Project. Throughout the IS, where LRDP Amendment (2017) Final SEIR PPs or MMs have been identified, the PPs and/or MMs have been exactly referenced as in the LRDP Amendment (2017) Final SEIR. This numbering system enables the public and other users of this document to cross reference these procedures and measures with the LRDP Amendment (2017) Final SEIR and align the mitigation monitoring procedures for the proposed Project with the adopted LRDP Amendment (2017) Final SEIR MMRP.

Following review of the proposed Project, it has been determined that the proposed Project is a “project” under CEQA and the University of California proposes to adopt an MND. In accordance with the CEQA Guidelines, an MND is the appropriate environmental document for the proposed Project because, after incorporation of Project-specific MMs, the proposed Project would not result in any significant and unavoidable impacts. All Project-level impacts can be mitigated to a level that is considered less than significant. Specifically, this IS identifies and proposes for adoption, Project-specific MMs to reduce Project-specific environmental impacts related to

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

geology and soils and construction-related noise and vibration. In addition to addressing the potential environmental impacts that would result from the proposed Project, this IS serves as the primary environmental document for all future activities associated with the proposed Project, including all discretionary approvals requested or required to implement the Project.

This IS, along with a Notice of Intent to Adopt an MND, has been circulated by the State Office of Planning and Research (State Clearinghouse) for review by State agencies, and has also been circulated to any responsible agencies, trustee agencies, and interested parties, as required by CEQA, for a 30-day public review. Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the University of California will determine whether any substantial new environmental issues have been raised. It is anticipated that the proposed Project will subsequently be considered by the Regents at their meeting in May 2020.

## **II. PROJECT DESCRIPTION**

The proposed Project involves the development of apartment-style units for UCLA faculty housing on the approximately 25,700 square foot (sf) (0.6-acre) Project site located northeast of the intersection of Hilgard Avenue and Lindbrook Drive. For purposes of analysis in this IS, it is anticipated that the proposed Project would involve the development of one residential structure up to 78-feet high. There would be approximately 120,000 gross square feet (gsf) of residential building space to accommodate up to 100 apartment units with an interior landscaped courtyard. Two levels of subterranean parking (up to 50,000 gsf) would also be provided. More detailed information regarding the Project Description is provided in Section II.5, Proposed Project Components.

### **1. PROJECT LOCATION**

The proposed Project is located northeast of the Hilgard Avenue and Lindbrook Drive intersection,<sup>2</sup> within the community of Westwood, in the City of Los Angeles. At its closest point, the Project site is approximately 0.2 mile from the southern edge of UCLA's main campus. The Project site is approximately 10 miles west of downtown Los Angeles and 5 miles from the Pacific Ocean (refer to Figure 1, which depicts the regional location and local vicinity). Figure 2 provides a map of the UCLA campus and specifically shows the location of the proposed Project, which is located off campus.

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

### **2. ENVIRONMENTAL SETTING**

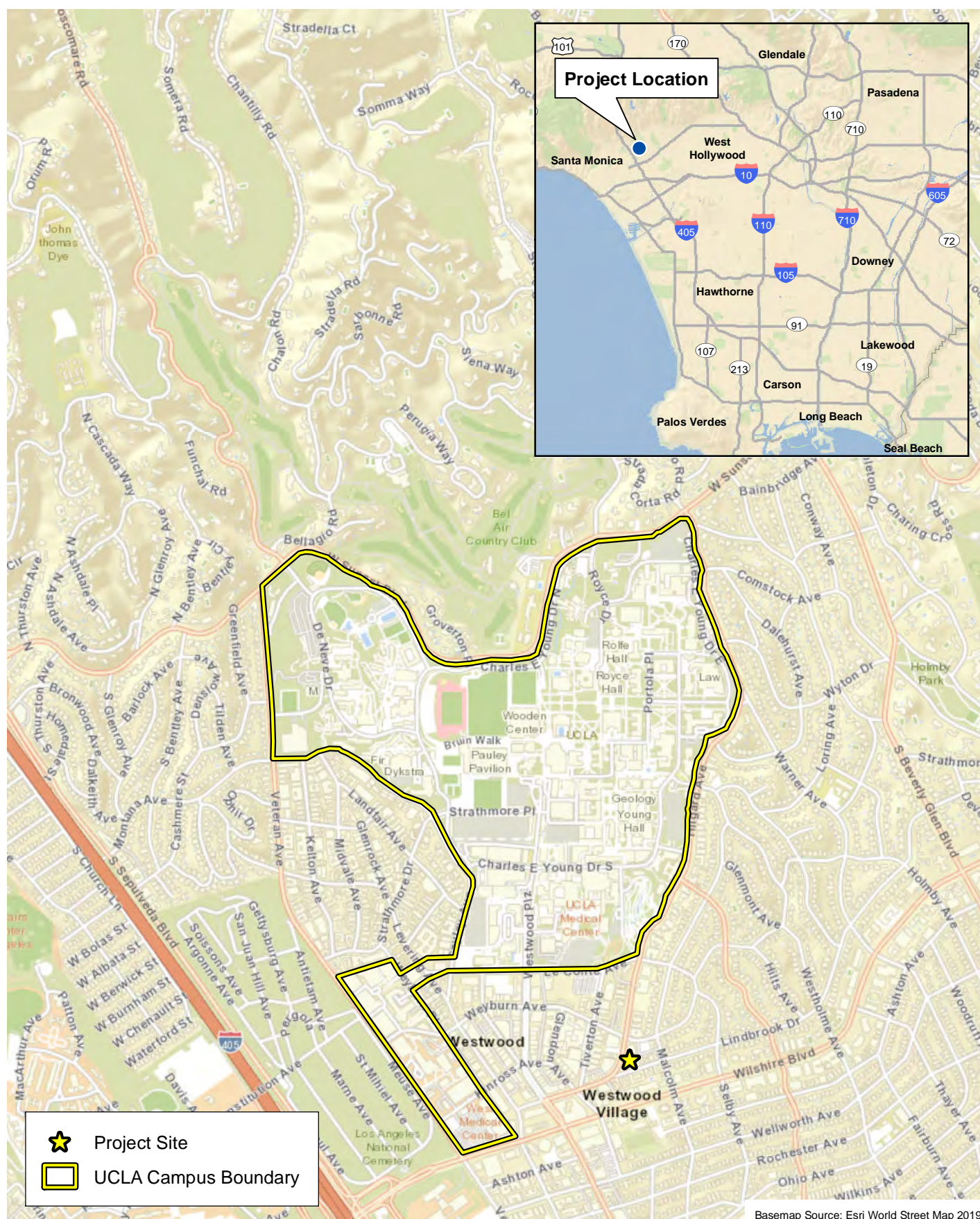
As shown on the aerial photograph provided on Figure 3, and the site survey provided on Figure 4, the approximately 0.6-acre Project site is an irregularly-shaped parcel that is currently vacant, with walls located along the north and east site boundaries. The walls remain from the Twenty-eighth Church of Christ, Scientist (herein referred to as the "Church") auditorium, which previously occupied the site; the building was demolished in 2017. A two-story multi-family residential structure abuts the Project site to the east, and the Church property abuts the Project site to the north. The Church property is developed with a single-story church with landscaping, a pedestrian

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<sup>2</sup> The Project site includes Lots 6, 7, and 8 of Tentative Tract 10690; Assessor Parcel Number (APN) 4360-002-021.



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## Regional Location and Local Vicinity

*Hilgard Faculty Housing Project*



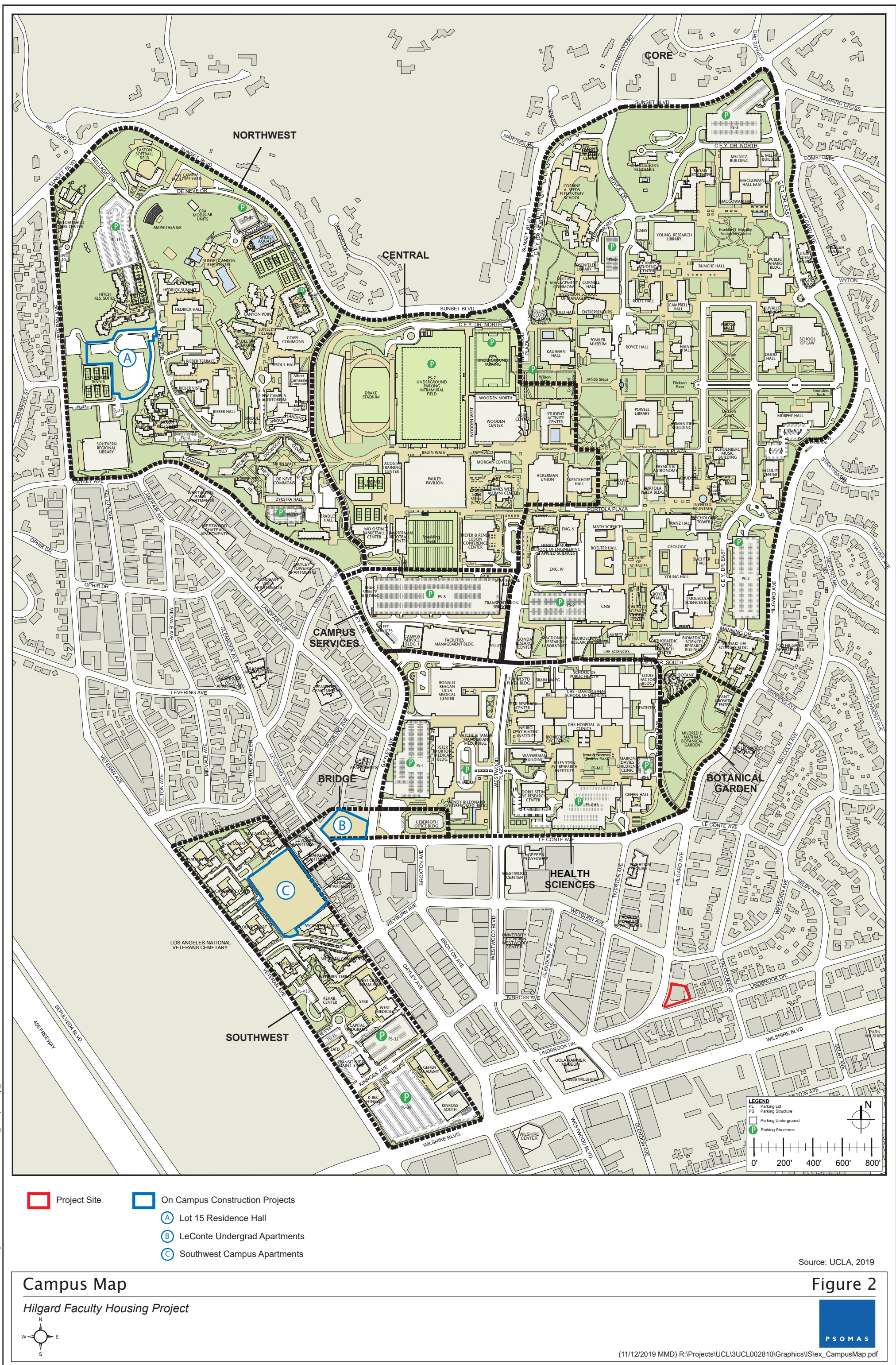
1,500 750 0 1,500  
Feet

## Figure 1



(Rev: 11/11/2019 MMD) R:\Projects\UCL\3UCL002810\Graphics\JStex\_LV\_RL.pdf







walkway, and a staircase along the southern property boundary adjacent to the Project site. The Project site is bound by Lindbrook Drive to the south and Hilgard Avenue to the west.

The Project site and adjacent parcels have a City of Los Angeles General Plan land use designation of Medium Residential and is zoned [Q]R3-1-O (City of Los Angeles 2019a), which is a multiple dwelling zone. Further, the Project site is within the *Westwood Community Multi-Family Specific Plan* (City of Los Angeles 1988a) area, which establishes development standards for multiple-family residential buildings in specified portions of the *Westwood Community Plan* area (City of Los Angeles 2010).

There is a mix of dense urban development in the Project area with varied architectural styles, building massing, and building heights. The Project site is a “gateway” site that straddles two complementary settings in Westwood. Along Hilgard Avenue there are commercial uses, mid-rise apartments, and high-rise residential towers and hotels further north. Along Lindbrook Drive there are two- to four-story residential structures including courtyard apartment houses and large single-family residences. Architectural styles of nearby housing range from “spare” Spanish Colonial, to “30’s Moderne,” to straight-lined Modern or Midcentury expression. The Church building to the north of the Project site is of the latter character. Due to the density of urban development, height of surrounding buildings, and variations in topography, views of the Project site are essentially limited to vantage points along the adjacent roadways or in immediately adjacent areas. The visual character of the Project site and surrounding areas is shown in the photographs presented in Section V.1, Aesthetics, of this IS.

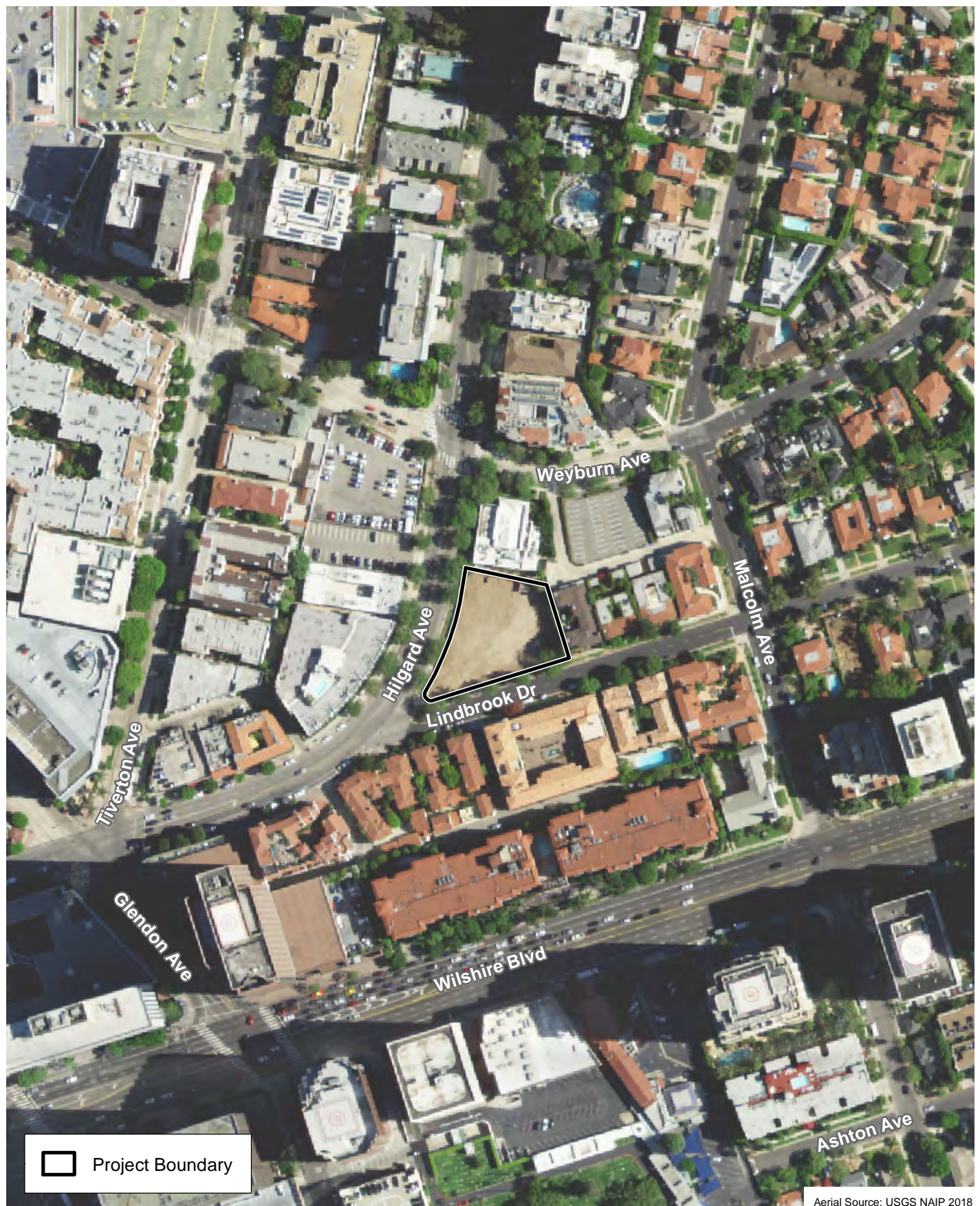
Chain-link fencing with green mesh has been installed along the western and southern perimeters of the Project site for safety, security, and visual screening. There is currently no access to the Project site. However, there are three curb cuts adjacent to the Project site, one on Hilgard Avenue, one on Lindbrook Drive, and the third at the intersection of these two streets. There are metered parking spaces on the westerly side of the property, along Hilgard Avenue, and permit (unmetered) street parking on Lindbrook Drive. There is no vegetation and no naturalized areas, stream channels, or otherwise sensitive hydrologic or biological resources on the Project site; however, nine southern magnolia (*Magnolia grandiflora*) trees are located in the public parkways along Hilgard Avenue and Lindbrook Drive.

The elevations of the Project site range between 322.5 feet above mean sea level (amsl) and 333.1 feet amsl. In general, the higher elevations are located along the east and south edges of the site with steep slopes from the southeast corner and at the northeast side of the site. The biggest elevation difference is approximately 10 feet at the south side of the site. The lowest point along the site’s property line is located near the intersection of Hilgard Avenue and Lindbrook Drive.

The Project site is underlain by artificial fill to a maximum depth of 15 feet below the ground surface (bgs) and Pleistocene age alluvial fan deposits beneath the fill. Regionally, the Project site is in a seismically active area bound by two important faults in the Santa Monica Fault Zone: the active Malibu Coast/Santa Monica/Raymond/Sierra Madre/Cucamonga Fault and the active Newport-Inglewood Fault. However, there are no known active or potentially active faults that underlie the Project area.

Groundwater was encountered in two borings conducted at the Project site, at depths of 52.3 and 53.0 feet (Geocon 2019). Surface water drainage at the site sheet flows in a westerly manner along the existing ground contours to the adjacent streets. Existing water, sewer, drainage, electric, natural gas, and telecommunications infrastructure is located in the roadways adjacent to the Project site, as further discussed under “Utilities/Infrastructure” in Section II.5, below.





Aerial Source: USGS NAIP 2018

## Aerial

### Hilgard Faculty Housing Project



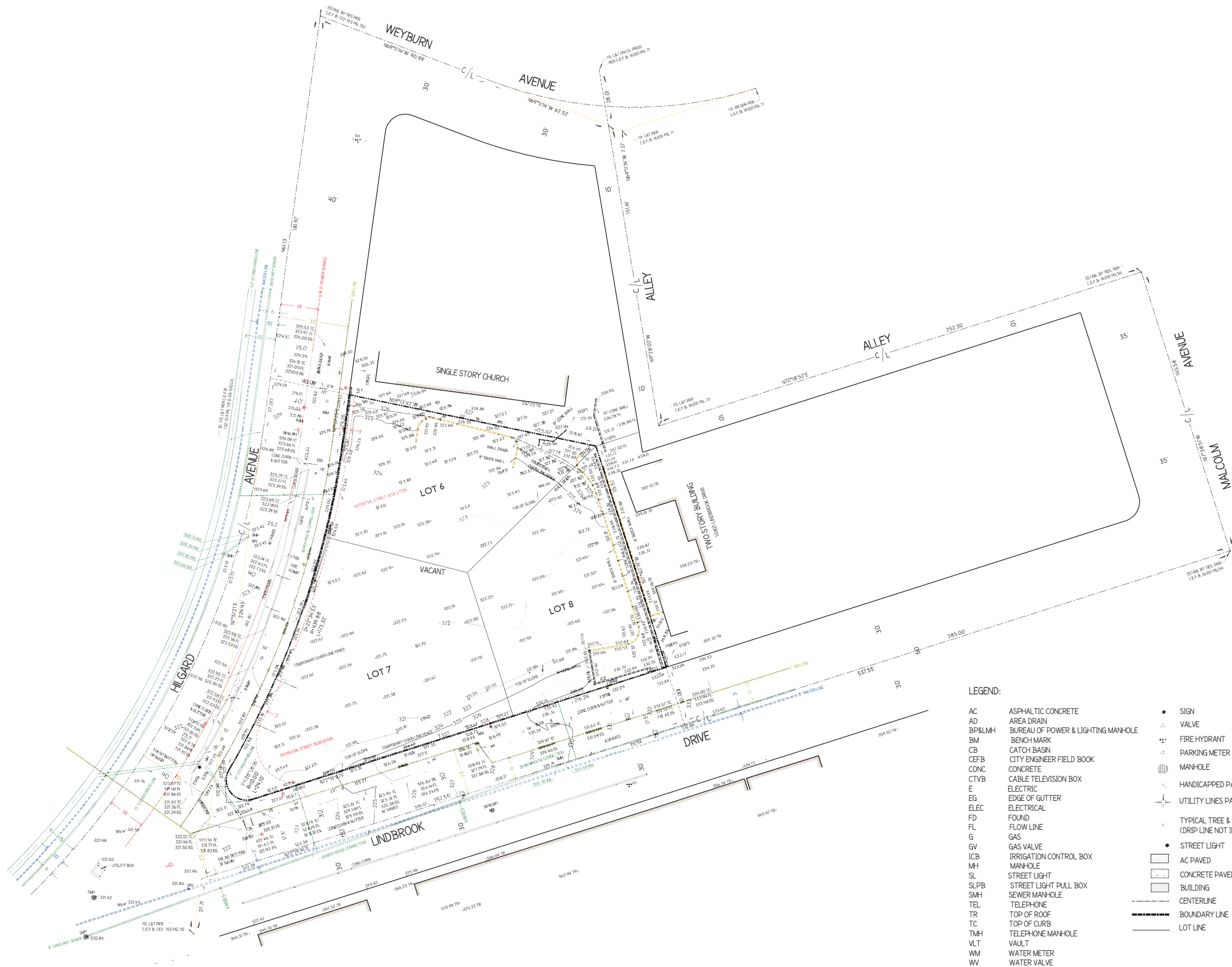
200 100 0 200  
Feet

## Figure 3





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#### SURVEYOR'S NOTES:

- DATE OF SURVEY: JUNE 06, 2019 AND JULY 03, 2019
- SITE AREA:  
NET AREA: 25692.81 SQ. FT., OR 0.5886 ACRES  
NET AREA AFTER DEDICATION: 24639.88 SQ. FT., OR 0.5657 ACRES
- BASIS OF BEARINGS:  
THE BEARING S 72° 19' 41" W OF THE CENTERLINE OF LINDBROOK DRIVE, AS SHOWN ON MAP OF TR. NO. 10690, AS PER MAP RECORDED IN BOOK 167 PAGES 11 AND 12 OF MAPS, WAS TAKEN AS THE BASIS OF BEARINGS FOR THIS MAP.
- VERTICAL DATUM:  
CITY OF LOS ANGELES BM NO. 13-13101 ELEV. = 319.218 (2000ADJ.), SPK E. CURB GLENDON AVE. 0.5 FT N/O BCR N/O WILSHIRE BLVD.  
CITY OF LOS ANGELES BM NO. 13-13160 ELEV. = 303.628 (2000ADJ.), WIRE SPIKE NORTH CURB WILSHIRE BLVD 2.1 FT E/O BCR GAYLEY AVE.
- UNDERGROUND UTILITIES SHOWN HEREON ARE PER CITY OF LOS ANGELES RECORDS AND PER FIELD LOCATION AS EVIDENCED BY PAINT MARKS ON THE PAVEMENT, AND CANNOT BE GUARANTEED FOR COMPLETENESS OR ACCURACY. THEIR LOCATION SHOULD BE VERIFIED IN THE FIELD BEFORE ANY EXCAVATING.
- ZONING: [O] R3-1-O

#### SETBACK REQUIREMENTS

FRONT YARD: 15 FT.; 10 FT. FOR KEY LOTS  
SIDE YARD: 10% LOT WIDTH < 50 FT.; 5 FT.; 3 FT. MIN.; +1 FT. FOR EACH STORY OVER 2ND NOT TO EXCEED 16 FT.  
REAR YARD: 15 FT.

THIS SUMMARY IS ONLY A GUIDE. DEFINITIVE INFORMATION SHOULD BE OBTAINED FROM THE ZONING CODE ITSELF AND FROM CONSULTATION WITH THE DEPARTMENT OF BUILDING AND SAFETY.

- DISTRICT MAP NO.: 132B 153
- SEWER WYE MAP NO.: 132-153-1
- STREET DEDICATION:  
HILGARD AVENUE : AVENUE II STREET - 83 (REQ.) 3 FOOT POSSIBLE DEDICATION.

#### 20 FOOT RADIUS RETURN

\* DEDICATIONS SHOWN HEREON ARE BASED ON NAVIGATE L.A. STREET & HIGHWAY STANDARDS AND ARE SUBJECT TO REVIEW BY BUREAU OF ENGINEERING AND DEPARTMENT OF TRANSPORTATION. \* SEE CITY OF LOS ANGELES MOBILITY PLAN 2035, APPROVED JUNE 23, 2016, CITY PLAN CASE NO. CPC-2013-0910-GPA-SPCA-MSC.

#### 10. FLOOD ZONE DATA:

FLOOD ZONE: X  
COMMUNITY NO.: 06037C  
PANEL NO.: 1590F  
EFFECTIVE DATE: 09-26-2008

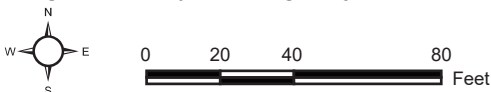
11. NOTE:  
ONLY A SIGNED AND SEALED COPY OF THIS SURVEY REPRESENTS A TRUE COPY OF OUR WORK PRODUCT; ANY COPIES CREATED FROM ELECTRONIC FILES OR OTHER METHODS MUST BE COMPARED TO A SIGNED AND SEALED COPY TO ASSURE IT'S ACCURACY AND COMPLETENESS.

LEGAL DESCRIPTION:  
LOTS 6, 7 AND 8 OF TRACT NO. 10690, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 167 PAGES 11 AND 12 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

Source: Iacobellis & Associates, 2019

## Site Survey

### Hilgard Faculty Housing Project



## Figure 4



(11/1/2019 MMD) R:\Projects\UCL\3UCL002810\Graphics\ISlex\_Site\_Survey.pdf

### **3. BACKGROUND AND NEED FOR THE PROPOSED PROJECT**

UCLA convened a task force in 2018 to determine the most critical needs of current and new faculty, and how to better retain and recruit high-value candidates. A survey of UCLA faculty conducted in September 2018 found that housing cost and proximity to campus were rated as very important or important factors for a majority of respondents in their decision to accept or continue employment at UCLA. Residing close to campus minimizes time and cost related to a daily commute. Market rental rates in areas proximate to the campus are among the highest in the nation, reducing affordability and access to faculty. The task force concluded that increasing proximate and affordable below market housing inventory for faculty was the highest priority to support recruitment and retention efforts.

UCLA currently maintains 189 units of campus faculty housing, ranging from studios, one-, two-, and three-bedroom apartments and condos, to three- and four-bedroom single-family homes, available at below-market pricing, with a variety of lease terms. The demand for faculty housing is consistently high and exceeds the available supply, with a waitlist that typically includes about 100 faculty members every year, but can reach as high as 200 faculty members. To address the continued demand for faculty housing, various options were considered by UCLA, including the potential of converting existing graduate student housing possessing the desired characteristics into faculty housing. However, the existing inventory of graduate student housing already does not meet the current demand. There is no excess inventory to convert existing graduate housing to faculty housing. Acquiring existing developed property was also considered; however, few properties of the size and type of the current Project site are available for purchase. Further, existing properties often require some level of renovation to bring the structures into compliance with current code requirements, seismic policy, and campus guidelines. Existing properties also frequently house current tenants that would have to be relocated at the University's expense.

UCLA purchased the Project site in August 2018 from the Twenty-eighth Church of Christ, Scientist. As identified previously, the Church building that previously occupied the Project site was demolished by the Church in 2017, leaving the site vacant. The Project site is large enough to meet much of the outstanding demand for faculty housing, and is located within the Westwood community, within the desired proximity to campus and amenities. The Project site is in a neighborhood close to the main campus, with easy access to grocery, retail, dining, services, parks, and cultural venues. Campus shuttles provide direct service between the neighborhood and the main campus at regular intervals throughout the day. The neighborhood also has access to public transit (bus and future rail) to connect residents to the broader metropolitan area.

Development of the Project site by UCLA is subject to certain restrictions and covenants outlined in the Grant Deed for the property. In summary: (1) any building developed on the Project site must be setback 20 feet from the southerly wall of the adjacent Church building to the north; (2) any portion of a building on the setback line higher than three stories above ground shall be terraced away from the setback line; (3) the property must be used predominantly for faculty housing (not student housing or "by the bed" renting or leasing); and (4) the maximum height of any building shall not exceed 78 feet. These restrictions are in place until the earlier of: (1) July 1, 2058; (2) the date the remaining Church property to the north of the Project site is sold by the Church (not including property primarily used for parking purposes); or (3) the Church permanently ceases to use the property to the north of the Project site for weekly services.

Based on the ongoing demand for faculty housing, the availability of property currently owned by the University proximate to the UCLA campus, and the deed restrictions placed on the Project site that dictate the type of housing that can be developed, UCLA is proposing faculty housing on the Project site.

#### 4. PROJECT OBJECTIVES

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

- Provide up to 100 apartment units for faculty housing to address current and anticipated demands.
- Provide University-owned faculty housing to support recruitment and retention of top-quality faculty for academic programs by providing quality, below-market-priced housing for faculty and their families in close proximity to campus.
- Provide faculty housing that is consistent with the spatial development and density of existing development in the surrounding area while maintaining and maximizing the use of limited land resources.
- Continue infill development, which reduces vehicle miles traveled (VMT) and energy consumption.
- Provide new faculty housing designed to optimize security, operational efficiency, safety, accessibility, and convenience for faculty residents.
- Plan, design, and implement the proposed Project in a manner consistent with the University of California (UC) Policy on Sustainable Practices.
- Plan, design, and implement the proposed Project within the practical constraints of available funding sources, including the need to maintain affordable University-owned housing fees.

#### 5. PROPOSED PROJECT COMPONENTS

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

- Hilgard Faculty Housing Building
- Circulation and Parking
- Outdoor Amenities, Landscape/Hardscape, and Exterior Lighting
- Sustainable Building Features
- Utilities/Infrastructure
- Population
- Construction Activities

Moore Ruble Yudell Architects & Planners (MRY) has worked closely with UCLA to develop the *University of California, Los Angeles Hilgard Faculty Housing Detailed Project Program* (DPP) that defines the guiding design principles, program requirements, and performance criteria for the proposed Project Test Fit for the Design Build Competition (MRY 2019). The selected Design-Build Entity will be required to distill the stated criteria in the DPP into a design solution that satisfies UCLA requirements.

The DPP is intended to guide development of faculty housing at the Project site, which meets required access, scale, massing, and guiding planning principles. The building envelope as well as program requirements and criteria outlined in the DPP take into consideration physical site constraints (configuration, topography, etc.), location of the Project site, and building restrictions imposed as part of the purchase of the property, while at the same time respecting community

concerns and recognizing the neighborhood character such as the range of building heights and scales within the neighborhood. Conceptual plans, unit plans, and sections were developed by the Architect and included in the DPP to verify that the respective space programming/planning, building height and massing, site capacity, and setbacks can be met. The development solution is presented in the DPP as a “building test fit.” The resulting graphic depiction of the building test fit in the DPP is for informational purposes only.

Although a Project-specific site plan, building elevations, architectural design, etc. have not been established for the proposed Project, as this will be the responsibility of the Design-Build Entity, the DPP provides sufficient detail to describe the proposed Project and inform the CEQA-required environmental analysis. It should be noted that key components of the DPP that are relevant to the environmental analysis have been identified in this Project Description and in the respective sections of this IS.

Following is a description of the proposed Project and Project assumptions that form the basis for the analysis presented in this IS. Should the final design developed by the Design-Build Entity be inconsistent with any of the Project assumptions used for the basis of analysis, the University will determine if the final design is within the scope of the analysis in the IS, and if any additional environmental documentation pursuant to CEQA is needed.

### **Hilgard Faculty Housing Building**

The proposed Project involves development of the Project site with a single building, up to 78-feet high, to accommodate apartment units for faculty housing and to provide on-site subterranean parking. The Space Program and associated information presented in the DPP outlines the minimum requirements for development of the proposed Project; the assignable square footage (asf)<sup>3</sup> has been provided for each required space. The Design-Build Entity will determine the gross square footage, which will include but not be limited to the following spaces: building structure; building circulation; support spaces such as mechanical, electrical, telecommunications, and security; and maintenance spaces. Based on the assignable square footage requirements established in the DPP, for purposes of analysis in this IS, it is assumed the proposed faculty housing building would include a maximum of 120,000 gsf of residential building space and a maximum of 50,000 gsf of parking space.

The residential program outlined in the DPP emphasizes two-bedroom/two-bathroom apartment units. The DPP calls for a target of 83 units; however, acknowledging that the Design-Build Entity may design a building able to accommodate additional units, for purposes of analysis in this IS, it is conservatively assumed that up to 100 apartment units may be developed. Each apartment unit would include bedrooms, bathrooms, living and dining spaces, kitchens, and laundry facilities. At a minimum, residential support spaces in the proposed building would include a lobby, mailroom, common area restroom, and custodial space, and a trash chute/recycling/compost room.

Figure 5 depicts representative building sections for the proposed Project, which comply with the maximum 78-foot height limit and setback requirements established through the deed restrictions placed on the Project site. Figure 6 depicts the representative height and massing based on the building test fit, and Figure 7 depicts the zone of articulation. Additionally, as a response to the varied urban context on all sides of the Project site, the DPP includes a set of setbacks, alignments, and build-to lines, which are shown on Figure 8. As shown on these figures, the building would be a maximum of seven-levels.<sup>4</sup> At the north facade (facing the Church property),

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<sup>3</sup> Assignable square footage is the sum of all floor or surface areas of a building assigned to, or available for assignment to, an occupant or user, including every type of space functionally usable by an occupant or user.

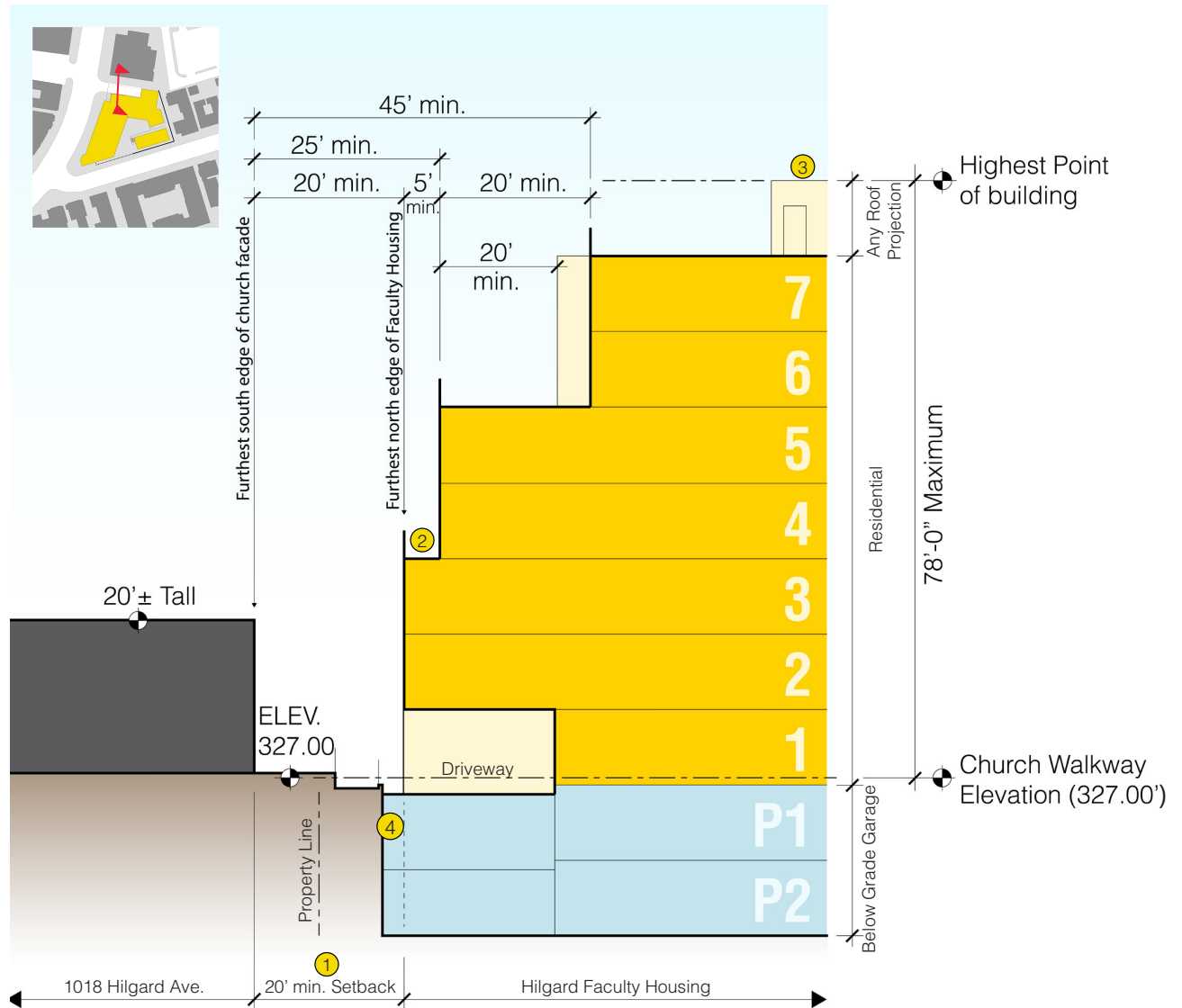
<sup>4</sup> The proposed building shall be designed such that the highest occupied floor does not exceed 75-feet so that it is not classified as a high-rise building.

the proposed building height is reduced to five stories, would be set back a minimum of 20 feet from the southern facade of the Church building, and would have a stepped massing with a 5-foot minimum terrace at the third floor and a 20-foot minimum terrace at the sixth floor. At the eastern facade, the proposed building would be set back a minimum of 11 feet from the property line between the Project site and the residential use to the east.

The architectural design and other design elements of the proposed building will be developed by the Design-Build Entity selected by UCLA. However, the DPP outlines minimum guiding design principles for site and building elements including site planning strategies, building massing, and articulation, which are incorporated into the proposed Project. Key required elements for Project design not previously described include:

- Zone of articulation at the two street-front facades to encourage scale and facade treatments. This 2- to 5-foot depth is intended for building articulation to break down the scale of the facades; no balconies are allowed.
- A courtyard opening in the buildable envelope along Lindbrook Drive consistent in character with existing residential buildings in this area.
- Required project setbacks that are not paved for vehicular or pedestrian access shall be planted and irrigated.
- Simple masses articulated to create contemporary expression and compositions of light and shadow.
- Building massing to express the corner condition at the Hilgard Avenue and Lindbrook Drive corner.
- Horizontal shadow lines to animate facades.
- Tactile materials and attention to detail to provide visual interest for pedestrians.
- Exterior materials that promote an architectural vocabulary appropriate to the Project setting at the convergence of Westwood's commercial and residential neighborhoods. The predominant exterior building material would be cement plaster. Accent exterior building materials compliant with DPP requirements may include:
  - ceramic tile
  - composite cement panels
  - concrete masonry
  - cast-in-place concrete (limited to below-grade parking, exposed soffits, and columns)
  - high performance coatings on exterior metal (panels, windows, railings, etc.)
  - painted surfaces for accent colors (limited areas)
  - low-emissivity (low-E), high performance glass (glazing specifications are required to minimize energy consumption, glare, and reflectivity)
- Outdoor stairways and open walkways.
- Rooftop mechanical equipment screens.

The proposed Project (residential and parking uses) would be designed and constructed in compliance with applicable requirements of the *California Building Code (CBC)* and *California Health and Safety Code* (Sections 13000 et seq.) pertaining to, among other requirements, fire protection systems. Specifically, fire sprinklers, fire alarm systems, emergency lighting,



### Section Notes

- ① Minimum setback from (north) adjacent building face
- ② Required setback above third story (5'-0" Min.)
- ③ Maximum height of 78'-0" at highest point of the building (measured against church walkway elevation: 327.00')
- ④ Driveways required to access underground parking garage are not subject to the 20' building setback, as long as they are setback from the property line and below grade. Driveway must be screened from view from the Church property by landscape barrier or architectural screening devices on UCLA property

Source: Moore Ruble Yudel Architects and Planners, 2019

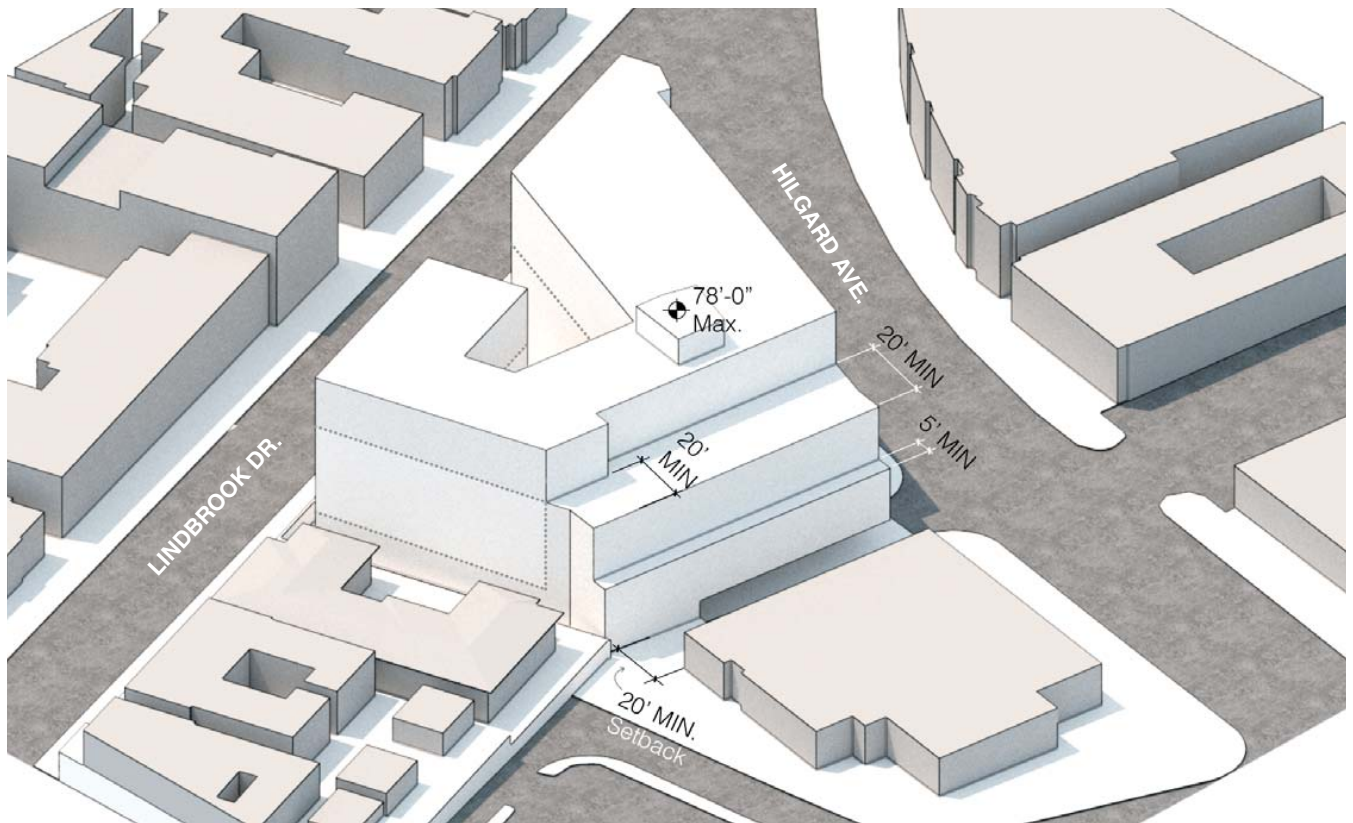
## Representative Building Section

Hilgard Faculty Housing Project

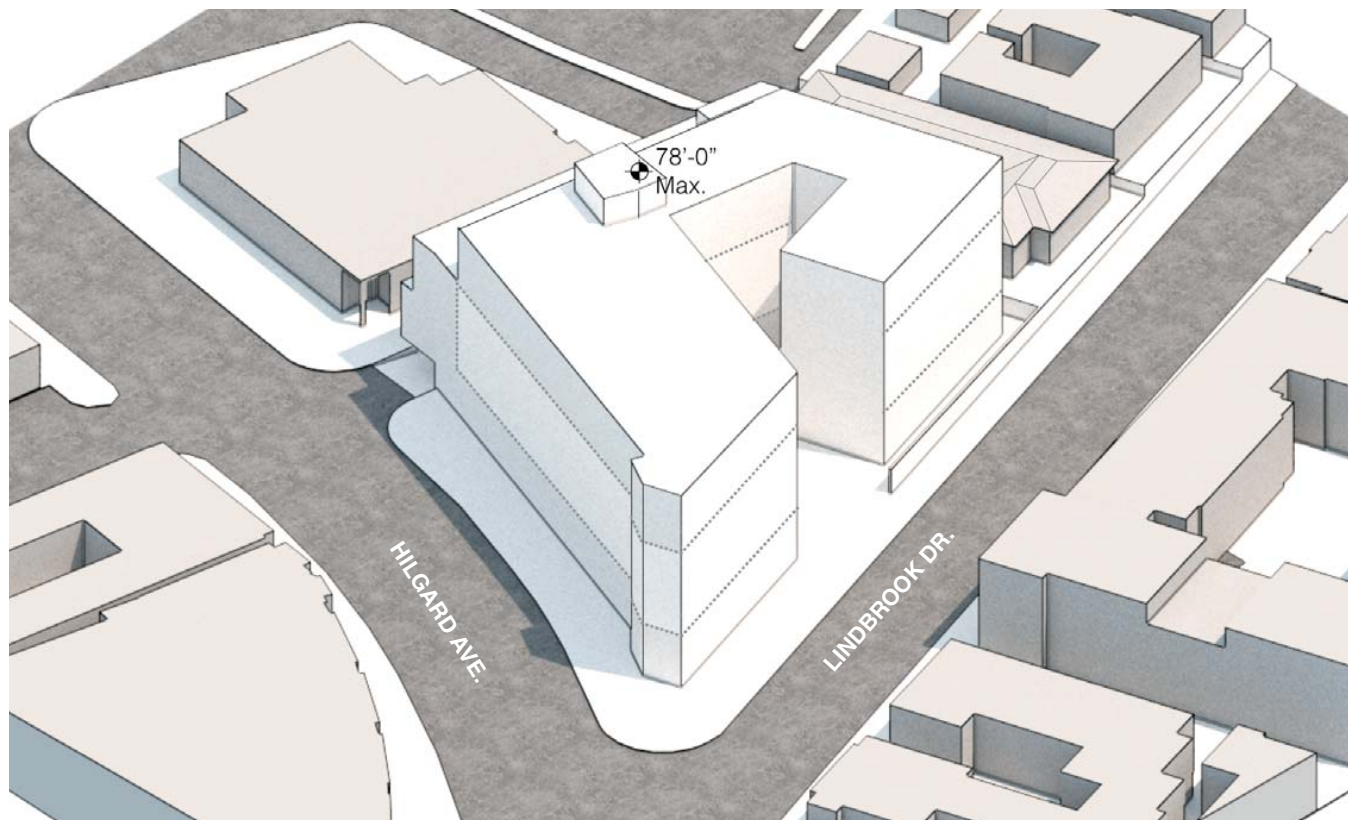
## Figure 5

PSOMAS





Massing diagram showing fit study with stepbacks at north façade adjacent to the church.



Massing diagram showing fit study with maximum height and courtyard accessed from Lindbrook Drive.

Source: Moore Ruble Yudel Architects and Planners, 2019

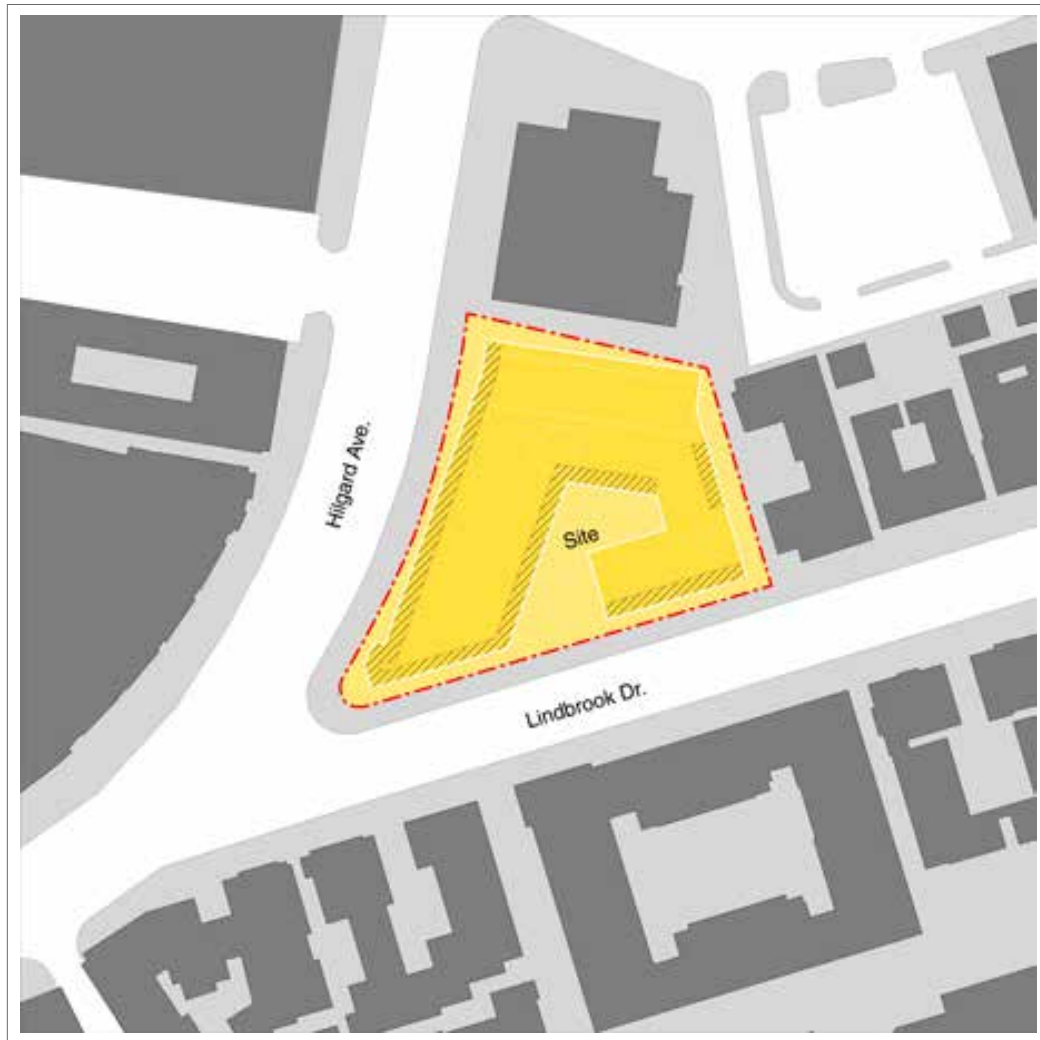
## Representative Building Massing

*Hilgard Faculty Housing Project*

## Figure 6

PSOMAS





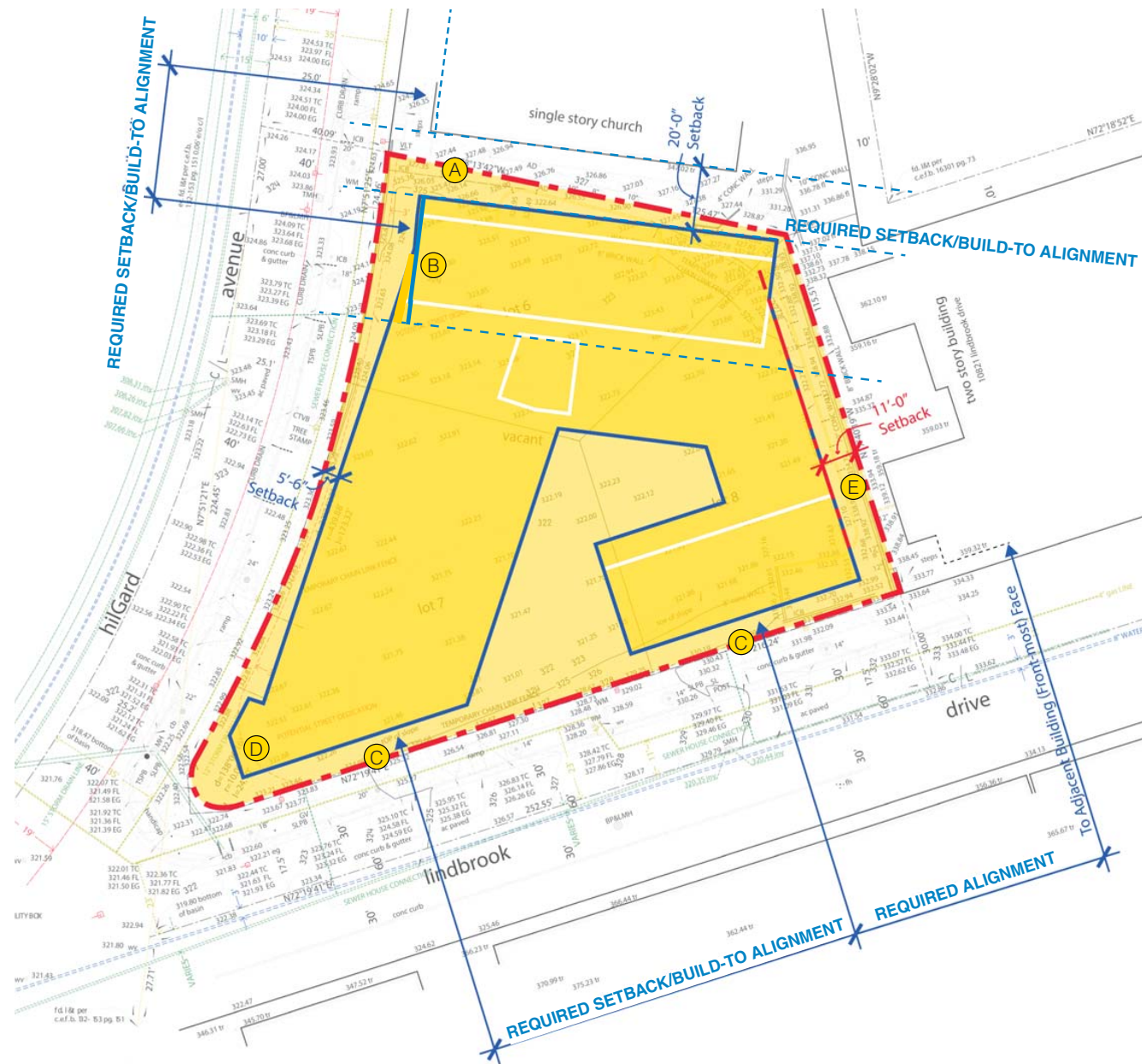
Source: Moore Ruble Yudel Architects and Planners, 2019

## Zone of Articulation

*Hilgard Faculty Housing Project*

## Figure 7

PSOMAS



As a response to the varied urban context on all sides of the property, the DPP calls for a set of setbacks, alignments, and build-to lines as shown on the Property Boundary and Edge Controls Diagrams.

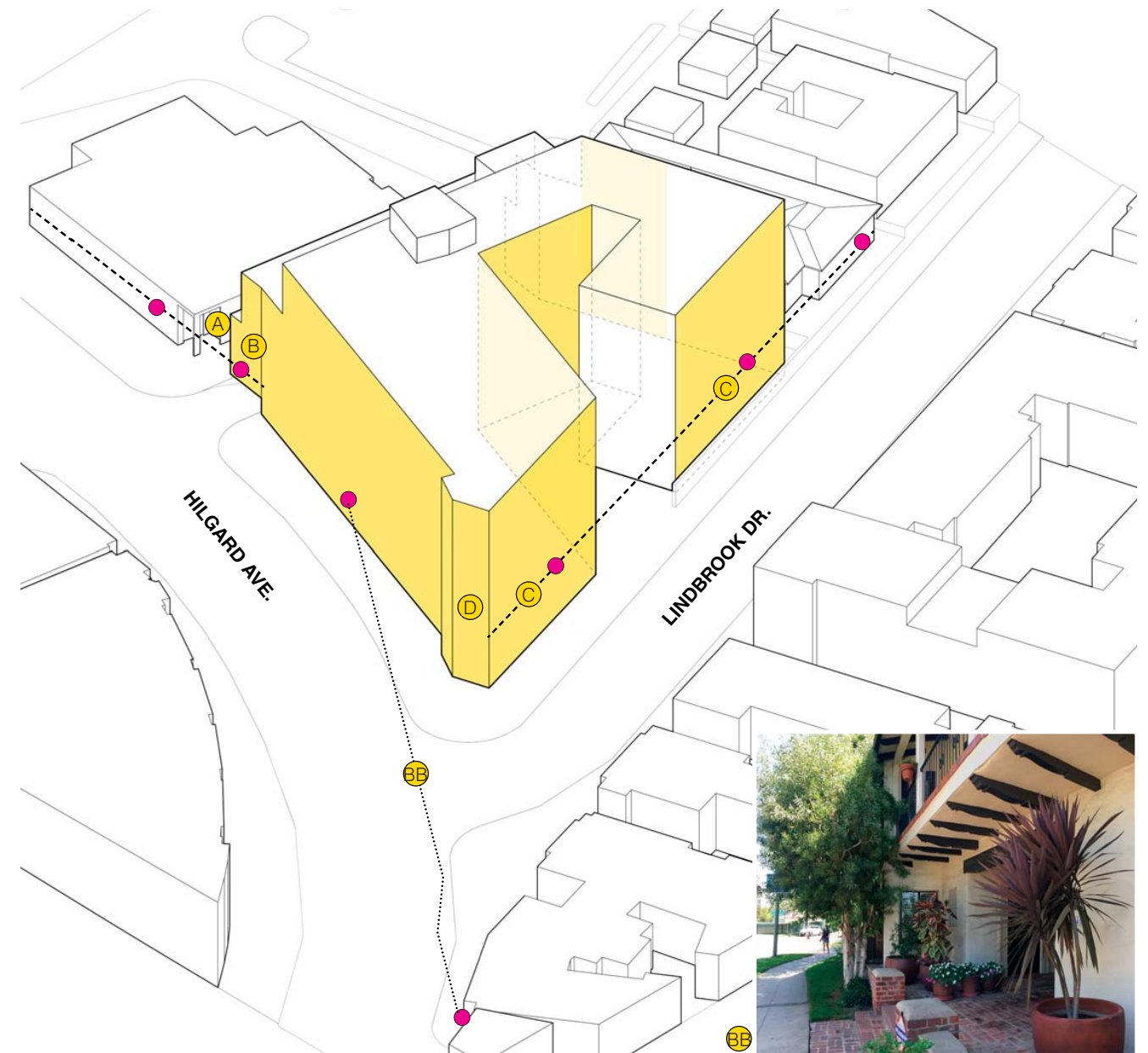
**(A) North Setback with Neighboring Church**

- Minimum twenty foot (20') building setback from south Church facade primary wall to north face of Hilgard Faculty Housing
- Build-to line, 100% of north building wall (except for garage driveway opening must built to this line to

**(B) Hilgard Building Setback/Build-to at Church**

- Front yard building setback on Hilgard Avenue immediately adjacent to the church is to match the prevailing setback established the church.
- A build-to line aligning with the setback is required for 80% or building facade for a minimum of 40' linear feet south of the northwest corner.
- (3E)** • A minimum front yard setback is similar to prevailing setback of neighboring apartment west on Hilgard.

define a Church Open Space (current walkway) up to three stories tall.



**(C) Lindbrook Drive Building Setback/ Build-to Line**

- Front yard building setback on Lindbrook Drive to match the prevailing setback established by 10621 Lindbrook.
- A build-to line aligning with the setback is required for 75% of the buildable envelope on this frontage.
- A courtyard opening shall be no wider than 25% of the buildable envelope on this frontage.
- A courtyard entrance gate must be recessed beyond the required setback sufficient to comfortably transition from the sloping Lindbrook sidewalk.

**(D) Corner Expression at Hilgard/Lindbrook**

- Building massing to express the corner condition at the Hilgard and Lindbrook corner is required.
- A corner tower recessed from the corner to create a positively shaped corner landscape is recommended.

**(E) East Sideyard Setback**

- East sideyard setback must be a minimum of 11' from the property line.
- A build-to line aligning with the setback is required for 60% of the buildable envelope on this frontage.

Source: Iacobellis & Associates, 2019

## Property Boundary and Edge Controls

*Hilgard Faculty Housing Project*

## Figure 8



emergency response notification systems, illuminated signage, and carbon monoxide sensing devices would be installed. Additionally, required emergency access, including for emergency response vehicles, would be accommodated.

### **Circulation and Parking**

The DPP includes criteria for vehicular and pedestrian access to the proposed Project. Access to the lobby and subterranean parking levels would be provided from Hilgard Avenue (in the northwest portion of the Project site), while secondary pedestrian access would be provided from Lindbrook Drive. Figure 9 depicts representative pedestrian, vehicular, and emergency access concepts based on the building test fit scenario.

It is anticipated that the existing loading zone on Lindbrook Drive would be maintained, but the loading zone on Hilgard Avenue would be relocated, closer to the building lobby entrance. Fire and other emergency vehicular access would be provided from Hilgard Avenue and Lindbrook Drive. Any abandoned driveways would be removed and replaced with full-height curb and sidewalk.

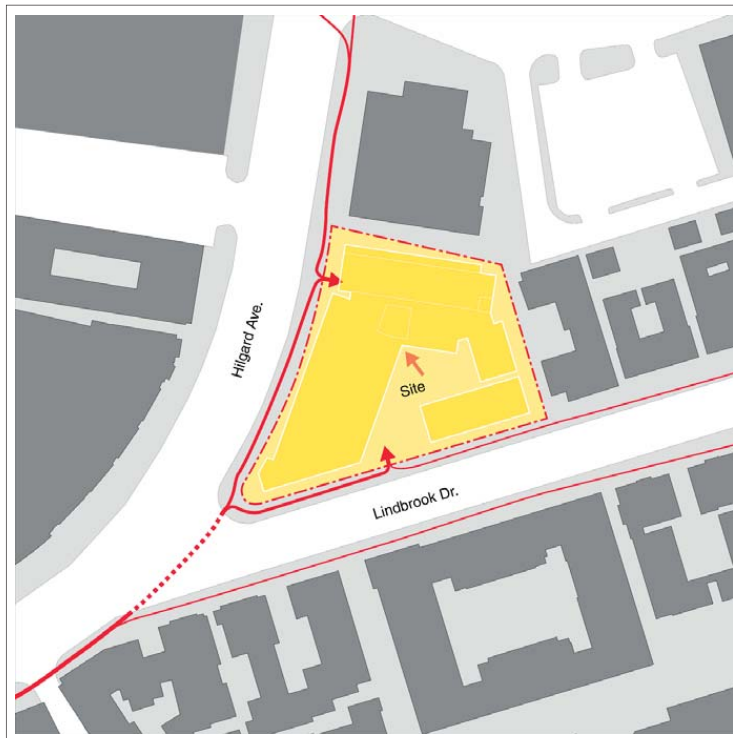
The proposed Project would include a maximum of two levels of subterranean parking that would be optimized for circulation and car count. A minimum of one car per unit is required, and at least one accessible parking space is required per accessible or convertible unit. The Design-Build Entity would optimize the two-level parking layout to achieve higher car counts. There are existing parking meters adjacent to the Project site along Hilgard Avenue. Parking meters would be removed, retained or replaced, as necessary, to accommodate the proposed vehicular driveway and relocated drop-off/pick-up loading zone. There is permit (unmetered) street parking on Lindbrook Drive, which would be retained.

Pedestrian access to the Project site is anticipated to be primarily from Hilgard Avenue with pedestrians coming from the southwest (from Westwood Village) and from the northwest (from the main UCLA campus). However, pedestrian access would also be provided from Lindbrook Drive. Emergency teams would be able to enter at pedestrian entrances to access the building. Additionally, accessible pedestrian pathways would be provided to link the building with the abutting city sidewalks. The existing sidewalks along Hilgard Avenue and Lindbrook Drive adjacent to the Project site would be replaced. An accessible path to the accessible parking spaces in the underground parking levels would also be provided.

Short-term bicycle storage racks would be provided for at least 2.5 percent of all peak visitors, but no fewer than four bicycle storage spaces would be provided. Long-term bicycle storage would be provided for at least 30 percent of the regular building occupants, but no less than one storage space would be provided per residential unit. It is anticipated the bicycle storage would occur in the subterranean parking.

Project access control and security systems would provide secure access to the building. Project residents would also have access to a full range of existing campus Transportation Demand Management (TDM) programs, including, but not limited to: campus transit; accommodations for the use of other modes of transportation, including walking, bicycles, motorcycles, and scooters; on-campus car share program; zip cars; public transit incentives; and use of UCLA's Commuter's Guide.



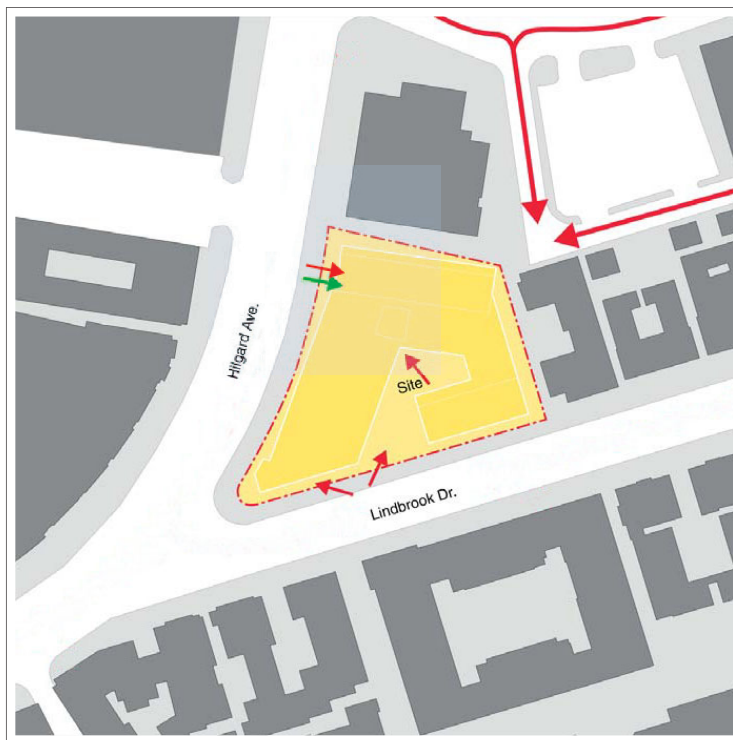


Pedestrian Site Access

### Pedestrian Site Access

Pedestrian access is emphasized along Hilgard, with movement anticipated to be coming from the southwest, Westwood Village retail and future Metro, and the north, from the UCLA campus. Secondary pedestrian routes will come from the east through the Little Holmby neighborhood or south from Wilshire Blvd.

- Pedestrian Traffic
- ..... No Crosswalk



Vehicular and Emergency Access

### Vehicular and Emergency Access

Parking for residents is entered from Hilgard, ideally at the northwest corner of the site. Locating the garage driveway mid-block, allows for better visibility to oncoming traffic. Fire and other emergency vehicular access is along the adjacent streets, with emergency teams able to enter at either pedestrian entrance (lobby or courtyard) to access the building. An existing church loading zone on Lindbrook will be maintained for for taxi/Uber/deliveries. Another loading on Hilgard, will be relocated north, close to the Lobby entrance.

- Parking Garage Vehicle Access
- Emergency Access

Source: Moore Ruble Yudel Architects and Planners, 2019

## Representative Site Access

*Hilgard Faculty Housing Project*

## Figure 9



### **Outdoor Amenities, Landscape/Hardscape, and Exterior Lighting**

Communal outdoor space would be provided for residents and guests. This could include, but not be limited to, an interior landscaped courtyard and amenity roof deck for small social gatherings and passive uses.

As shown in the representative landscape plan presented on Figure 10, landscape and hardscape features would be installed on site, and would include, but not be limited to, landscaped planters along the perimeter of the building; planter and seat walls in outdoor gathering spaces; setback planting (between the proposed building and existing uses to the north and east); planter pots; and decorative paving. A landscape buffer would be provided between the Church property to the north and the Project site, including at the northeast portion of the Project site to screen views into the Project driveway from the Church property. The landscape design would comply with the current UC sustainable design policy. Mandatory drought-tolerant planting design requirements would be met or exceeded by specifying climate-adapted plants, a water conserving irrigation system, and locally produced landscape materials and site furnishings to the greatest extent feasible.

There is no vegetation on the Project site; however, implementation of the proposed Project could require the removal of one or more existing mature southern magnolia street trees along Hilgard Avenue and Lindbrook Drive (refer to the discussion of Biological Resources in Section V.4). Additionally, trees along the northern portion of the Project site may be removed where the Church property encroaches into the Project site; however, these trees do not meet the criteria for mature trees. The proposed Project would provide one new tree for every one mature tree removed. It should be noted that no trees protected by the City of Los Angeles Protected Tree Ordinance No. 177404 would be removed. Existing turf in the public parkways along Hilgard Avenue and Lindbrook Drive that is damaged during construction would be repaired and/or replaced.

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

### **Sustainable Building Features**

The proposed Project would comply with the UC Policy on Sustainable Practices and Guidelines (UC 2019). Leadership in Energy and Environmental Design (LEED™) is a green building rating system that contains prerequisites and credits in five areas: (1) environmentally sensitive site planning; (2) water conservation; (3) energy efficiency; (4) conservation of materials and resources; and (5) indoor air quality. A minimum standard of a LEED for New Construction (NC) Silver rating has been established for applicable UCLA projects, including the proposed Project. To achieve this rating, the design, construction, and operation of the proposed Project would adhere to CalGreen Code requirements, would participate in applicable Savings by Design Conservation Programs, and would incorporate a series of green building strategies including, but not limited to, the following required features:

- Providing high-density redevelopment on a site that is connected to existing community services (commercial/retail, restaurant, entertainment, etc.), public and alternative transportation, and other urban infrastructure;
- Encouraging alternative transportation by limiting parking capacity and providing bicycle racks;
- Outperforming CBC Title 24 energy efficiency requirements, that are in effect at the time of building design, by 20 percent;

### Conceptual Landscape Plan - Sitework

- ① Courtyard Paving over Waterproofed Structural Slab by Others
- ② Planter and Seat Wall; Separate and Independent of Building Walls; Coordinate Waterproofing with Others
- ③ Planter Wall; Separate and Independent of Building Walls; Coordinate Waterproofing with Others
- ④ Shade Structure (Optional Design Suggestion to Mitigate Heat Island Effect)
- ⑤ Setback Planting
- ⑥ Privacy Planting
- ⑦ Rooftop Amenity Deck (6th Floor Access) Paved with Thin Set Porcelain Pavers, (Optional Design Suggestion if There is No Slab Depression to Accommodate Pedestal Paving System)
- ⑧ Controlled-Access Pedestrian Gate
- ⑨ Security Fencing
- ⑩ Optional Large Planter Pot with 36" Box (Min.) Tree
- ⑪ Concrete Paving
- ⑫ Trash Receptacle; UCLA Campus Standard
- ⑬ Gravel



--- Property Line



Source: Moore Ruble Yudel Architects and Planners, 2019

## Representative Landscape Plan – Site Work

*Hilgard Faculty Housing Project*



Figure 10

PSOMAS

- Incorporating a high-efficiency irrigation system and native/drought-tolerant species to reduce landscape irrigation demands;
- Selecting water fixtures (e.g., taps, toilets, shower heads, and other fixtures) to achieve a reduction in water demand and increase water efficiency;
- Using recycled/reclaimed storm water for irrigation;
- Including recycled content construction materials and regional construction materials in project design to reduce the effects of resource consumption;
- Using low volatile organic compound (VOC)-emitting adhesives, sealants, paints, coatings, and carpets in order to reduce air quality emissions; and,
- Restricting use of natural gas for space and water heating (a solar thermal system would be used to generate heated domestic water).

### **Utilities/Infrastructure**

The proposed Project would involve connections to existing utilities (domestic water, sewer, storm drains, natural gas, electrical, and telecommunications systems) that are currently located in the roadways adjacent to the Project site (refer to Figure 11). No new connections to City of Los Angeles facilities, upgrades of existing utility infrastructure, or installation of new utilities (beyond the connection of building infrastructure to the existing utilities) would be required off site to serve the proposed Project. Following is a description of proposed utility systems, including water quality Best Management Practices (BMPs):

- **Water** – There is an existing 6-inch City of Los Angeles Department of Water and Power (LADWP) water line in Hilgard Avenue and an 8-inch LADWP water line in Lindbrook Drive that have sufficient capacity to serve the domestic and fire flow needs of the proposed Project. The proposed Project would connect to these existing water lines. A dedicated water booster pump would be installed.
- **Sewer** – There is an 18-inch vitrified clay pipe (VCP) City of Los Angeles sewer main in Hilgard Avenue and an 8-inch VCP City of Los Angeles sewer main in Lindbrook Drive. Both sewers flow to the west and southwest and have sufficient capacity to serve the proposed Project. Gravity sanitary sewer laterals would be designed and constructed to pick up domestic sewage from the building and discharge to either City sewer main.
- **Drainage and Water Quality** – There is a 42-inch reinforced concrete pipe (RCP) City of Los Angeles storm drain line in Hilgard Avenue. As with the previously developed condition, the Project site would discharge to the 42-inch storm drain in Hilgard Avenue.

As further discussed in Section V.10, Hydrology and Water Quality, of this IS, Phase II of the National Pollutant Discharge Elimination System (NPDES) program regulates storm water discharges from small Municipal Separate Storm Sewer System Permits (MS4s) (such as schools and universities), and UCLA is approved for coverage under the Phase II Small MS4 General Permit. The proposed Project is required to meet Low Impact Development (LID) requirements. Storm water best BMPs would be designed and constructed within the Project site to treat storm water, remove pollutants, and control the discharge flow rate. The Phase II Small MS4 General Permit prioritizes BMP types as follows: infiltration, storage and reuse, and biofiltration. Based on the results of the Project-specific geotechnical report, a storm water infiltration system is not considered feasible. Therefore, storm water storage and reuse would be installed to meet applicable LID requirements. The required sizing of structural BMPs would be determined as part of the site-specific hydrology evaluation and would be based on the regulatory requirements of the applicable NPDES permit at the time of construction. The conceptual utility plan





anticipates installation of a cistern in the southwestern corner of the Project site, which would capture and hold runoff to be used for irrigation.

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

- **Electricity, Natural Gas, and Telecommunications** – Electricity and natural gas would be supplied to the proposed Project via connections to existing lines located in Hilgard Avenue. A new transformer would also be installed on site. Telecommunications facilities would also connect to existing facilities in Hilgard Avenue; there is an existing telecommunications manhole near the northwest corner of the Project site. Because the University of California does not allow the use of natural gas for water heating, a solar thermal tank would be provided as part of the proposed Project. An emergency generator would also be provided and is expected to be located in the parking garage level 1.

### **Population**

The proposed Project would provide up to 100 apartment units for UCLA faculty. It is anticipated that there would be up to 200 residents at the proposed Project with at least 100 of these residents being UCLA faculty. As noted above, demand for faculty housing is consistently high and exceeds the available supply, with a waitlist ranging from about 100 to 150 faculty every year. The proposed Project would accommodate existing and future faculty, but would not generate new faculty positions. The proposed Project would not increase the student population on campus, and would generate only two new staff positions (maintenance and custodial).

### **Construction Activities**

Construction of the proposed Project is anticipated to begin in October 2020 with completion in November 2022 (a construction duration of approximately 25 months). Construction of the proposed Project would occur Monday through Saturday and would be sequenced with overlapping activities, which are generalized as follow:

- Demolition and site preparation (1 month);
- Shoring and grading (2 months); and
- Building construction (25 months).

The entirety of the Project site (25,700 sf or approximately 0.6-acre) would be directly impacted by construction, as analyzed in this IS. In addition, there would be site adjacent off-site impact areas associated with work in the public right-of-way along Hilgard Avenue and Lindbrook Drive (for utility connections, curb construction and replacement, driveway access, sidewalk and parkway improvements, tree removal and replacement, etc.). Along the northern Project site boundary, Church hardscape and landscape features, including the walkway, stairway, and retaining wall, extend onto the Project site. Construction activities would include removal of these Church features. The retaining wall and walkway would be rebuilt as part of the proposed Project. Additionally, hardscape and landscape on Church property impacted during construction would be replaced. It is also anticipated the existing brick wall along the eastern portion of the Project site would be removed.

In addition to the identified construction area, a staging area is needed to receive, lay down, and prepare materials for use during construction. The construction staging area would be limited to the Project site boundary and adjacent roadways, as necessary.

Depending on the construction phase, implementation of the proposed Project would require common equipment, such as excavators, drill rig, loaders, backhoes, crane, forklifts, compressors, concrete trucks and pumps, and cement and mortar mixers. Because of the limited size of the site, the number of pieces of equipment on site at any given time would be limited. As required by existing regulations, soil erosion from the Project site during construction would be controlled through the use of various BMPs. The construction site would be encircled by stacks of sandbags, and stabilized driveways would be provided at construction entrances and exits. Existing catch basins would also be protected with appropriate BMPs to minimize sedimentation entering the storm drain system.

Grading activities for the proposed Project would involve excavation to a depth of approximately 24 feet bgs resulting in approximately 23,130 cubic yards (cy) of soil being exported from the Project site over an approximate 60-day period with 10-cy trucks. The soil export would require a total of approximately 2,313 round truck trips (4,626 one-way trips) over an estimated 52 days (the total period of 60 days. This equates to 90 truck trips per day for the anticipated 52 working days, and represents approximately 15 trips per hour (assuming 6 hours per day to avoid periods of peak hour traffic). Figure 11 also depicts the conceptual grading layout.

It is estimated there would be a maximum of approximately 10 to 15 construction workers per day at the Project site during excavation activities and up to 100 construction works on a maximum work effort day. Construction workers would park on and off campus, within a short walking distance of the Project site.

### ***Vehicular and Pedestrian Circulation During Construction***

A construction traffic route has been designated to efficiently move construction vehicles to avoid traffic from any other on-campus projects under construction at the same time, to the extent feasible.<sup>5</sup> Pursuant to PP 4.13-2 from the LRDP Amendment (2017) Final SEIR, the construction of these major projects would be coordinated to adjust construction schedules, work hours, and access routes to the extent feasible in order to reduce construction-related traffic congestion. Following is the planned route for construction traffic for the proposed Project.

**Approach:** I-405 exit to eastbound Wilshire Boulevard, left turn on Glendon Avenue, right turn on Lindbrook Drive, and left turn at Hilgard Avenue to the Project site.

**Departure:** Exit the site turning left onto Hilgard Avenue, right turn on Lindbrook Drive, left turn on Glendon Avenue, and right turn on Wilshire Boulevard to the I-405 northbound or southbound onramps.

During construction, the sections of sidewalk along the eastern side of Hilgard Avenue and northern side of Lindbrook Drive adjacent to the Project site would be closed to pedestrians. Pedestrians would be directed to the sidewalks on the opposite sides of the streets.

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<sup>5</sup> Current projects on campus or in close proximity that may be under construction at the same time as the proposed Project are identified on Figure 2, UCLA Campus Map, of this IS, and include the LeConte Undergraduate Apartments (construction estimated to be completed by December 2021), Lot 15 Residence Hall (construction estimated to be completed by November 2021), and Southwest Campus Apartments (construction estimated to be completed by July 2022).

## 6. ANTICIPATED DISCRETIONARY APPROVALS

The Regents and the responsible agencies identified below are expected to use the information contained in this IS for consideration of approvals related to and involved in the implementation of the proposed Hilgard Faculty Housing Project. This IS has been prepared to inform all State, regional, and local government approvals needed for construction and/or operation of the proposed Project, whether or not such actions are known or are explicitly listed. Anticipated approvals required to implement the proposed Project include, but are not limited to, those listed below.

### **University of California Board of Regents**

- Adoption of the Final IS and MND
- Approval of the Hilgard Faculty Housing Project

### **Responsible Agencies**

- **State Water Resources Control Board.** UCLA, or its designee, would comply with requirements of the applicable NPDES Phase II Small MS4 General Permit.
- **City of Los Angeles.** Coordination and compliance with design requirements and guidelines for construction activities within City rights-of-way, including construction staging, utility connection(s), street improvements, and tree removal/replacement.
- **South Coast Air Quality Management District.** UCLA, or its designee, would obtain permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants (e.g., heating, ventilation, and air conditioning units and diesel generators).

### III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

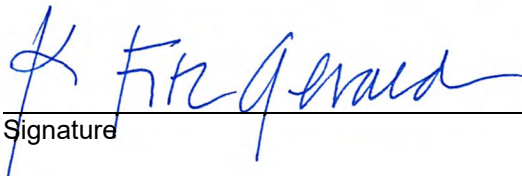
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture Resources    | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources       | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils             | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials      |
| <input type="checkbox"/> Hydrology/Water Quality   | <input type="checkbox"/> Land Use/Planning        | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing       | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                | <input type="checkbox"/> Transportation           | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                 | <input type="checkbox"/> Mandatory Findings of Significance |

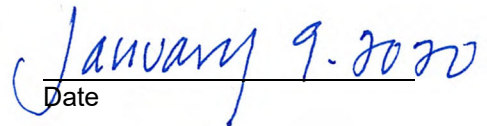
### IV. DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	<input checked="" type="checkbox"/>
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	<input type="checkbox"/>
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	<input type="checkbox"/>

  
Signature

Kathy FitzGerald, Director, Project Development

  
Date

UCLA Capital Programs  
For

## **V. EVALUATION OF ENVIRONMENTAL IMPACTS**

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

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

## **IMPACT QUESTIONS AND RESPONSES**

### **1. AESTHETICS**

As described previously in Section II, Project Description, of this IS, relevant elements of the proposed Project related to aesthetics/visual character include the development of the Project site with a new, up to 7-level, apartment building for faculty housing, with a contemporary architectural style sensitive to its context. Landscape and hardscape features would be provided throughout the Project site, and exterior lighting would be provided for pedestrian safety and site security. The architectural design of the proposed Project has not been determined at this time. While the design would ultimately be determined by the Design-Build Entity, the DPP outlines guiding design principles for all site and building elements, including site planning strategies, building massing, and articulation. Key required elements for Project design that are relevant to the analysis of aesthetics and are incorporated into the proposed Project include:

- Maximum 78-foot height limit, as required by the restrictions and covenants outlined in the Grant Deed for the property; the building height is measured from the existing walkway between the Project site and the Church building to the north. The height is reduced to five stories along the north property line, with a 5-foot minimum terrace-back at the top of the 3<sup>rd</sup> floor, and a second 20-foot minimum setback at the top of the fifth floor (refer to Figure 5 of this IS).
- Property boundary and edge controls, including required setbacks and “build-to” lines and alignments as shown on Figure 8 of this IS. This includes a minimum 20-foot setback from the southerly wall of the adjacent Church building to the north, as required by the restrictions and covenants outlined in the Grant Deed for the property. Any portion of a

building on the setback line higher than three stories above ground shall be terraced away from the setback line (refer to Figure 5 of this IS).

- Zone of articulation at the two street-front facades to encourage scale and facade treatments (refer to Figure 7 of this IS/MND). This 2- to 5-foot depth is intended for building articulation to break down the scale of the facades; no balconies are allowed.
- A courtyard opening in the buildable envelope along Lindbrook Drive consistent in character with existing residential buildings in this area.
- Required project setbacks that are not paved for vehicular or pedestrian access shall be planted and irrigated.
- Simple masses articulated to create contemporary expression and compositions of light and shadow.
- Building massing to express the corner condition at the Hilgard Avenue and Lindbrook Drive corner.
- Horizontal shadow lines to animate facades.
- Tactile materials and attention to detail to provide visual interest for pedestrians.
- Exterior materials that promote an architectural vocabulary appropriate to the Project setting at the convergence of Westwood's commercial and residential neighborhoods. The predominant exterior building material would be cement plaster. Accent exterior building materials compliant with DPP requirements may include:
  - ceramic tile
  - composite cement panels
  - concrete masonry
  - cast-in-place concrete (limited to below-grade parking, exposed soffits, and columns)
  - high performance coatings on exterior metal (panels, windows, railings, etc.)
  - painted surfaces for accent colors (limited areas)
  - low-E, high performance glass (glazing specifications are required to minimize energy consumption, glare, and reflectivity)
- Outdoor stairways and open walkways.
- Rooftop mechanical equipment screens.
- Replacement of mature trees removed at a 1:1 ratio.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the proposed Project. Therefore, the following PPs and MMs are considered part of the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment (2017) Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed. Changes have been made so the stated requirement better applies to the proposed Project, which is off campus.

- PP 4.1-1(a)** *The design process shall evaluate and incorporate, where appropriate, factors including, but not necessarily limited to, building mass and form, building proportion, roof profile, architectural detail and fenestration, the texture, color, and quality of building materials, focal views, pedestrian and vehicular circulation and access, and the landscape setting to ensure preservation and enhancement of the visual character and quality of the ~~campus and the~~ surrounding area. Landscaped open space (including plazas, courts, gardens, walkways, and recreational areas) shall be integrated with development to encourage use through placement and design.*
- MM 4.1-3(a)** *Design for specific projects shall provide for the use of textured non-reflective exterior surfaces and non-reflective glass.*
- MM 4.1-3(b)** *All outdoor lighting shall be directed to the specific location intended for illumination (e.g., roads, walkways, or recreation fields) to limit stray light spillover onto adjacent residential areas. In addition, all lighting shall be shielded to minimize the production of glare and light spill onto adjacent uses.*
- MM 4.1-3(c)** *Ingress and egress from parking areas shall be designed and situated so the vehicle headlights are shielded from adjacent uses. If necessary, walls or other light barriers will be provided.*

### **Project Impact Analysis**

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

1. The project is a residential, mixed-use residential, or employment center project.
2. The project is located on an infill site<sup>6</sup> within a transit priority area.<sup>7</sup>

The proposed Project meets these criteria. Criterion 1 is met due to the residential nature of proposed development. Criterion 2 is met because the Project site is an infill site located in a transit priority area. Due to consistency with the SB 743 criteria, potential aesthetic impacts are not considered to be impacts under CEQA for the proposed Project. However, this section includes an assessment of aesthetic impacts for informational purposes.

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<sup>6</sup> Infill site means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. Pursuant to Section 21072 of the Public Resources Code, "qualified urban use" means any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or a combination of those.

<sup>7</sup> Transit Priority Area is defined as an area that is within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in an adopted federal Transportation Improvement Program.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### ***Discussion***

Views of scenic vistas may be generally described in two ways: panoramic views (visual access to a large geographic area for which the field of view can be wide and extend into the distance) and focal views (visual access to an object, scene, setting, or feature of interest). Examples of panoramic views include urban skylines, valleys, mountain ranges, or large bodies of water. The Project site is located within a densely developed urban area and long-range panoramic views are largely blocked by surrounding development. As demonstrated in the photographs presented in Figures 12a through 12c, there are background views of the high-rise buildings along Wilshire Boulevard from certain vantage points along Hilgard Avenue and Lindbrook Drive. The proposed Project would not obstruct or have an adverse effect on a panoramic view.

Focal views include views of natural landforms, public art/signs, and visually important structures, such as historic buildings. There are no natural landforms or public art fixtures within the viewshed of the Project site. As further discussed in Section V.5, Cultural Resources, of this IS, there are City of Los Angeles-designated Historic Cultural Monuments along Lindbrook Drive, including apartment buildings south-southwest of the Project site across Lindbrook Drive. The proposed Project would not directly demolish or materially alter in an adverse manner those physical characteristics of these Historic Cultural Monuments that convey their historical significance (Page & Turnbull 2019). Therefore, the proposed Project would not have a substantial adverse effect on the view of these buildings.

Therefore, implementation of the proposed Project would not have a substantial adverse effect on a scenic vista.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

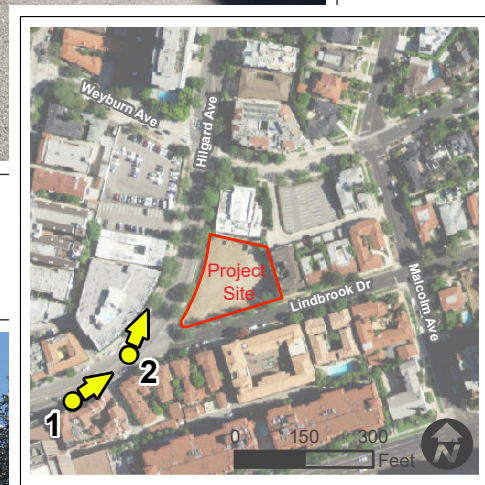
### ***Level of Significance***

The proposed Project would not have a substantial adverse effect on a scenic vista.





View 1



View 2

## Site Photos

*Hilgard Faculty Housing Project*

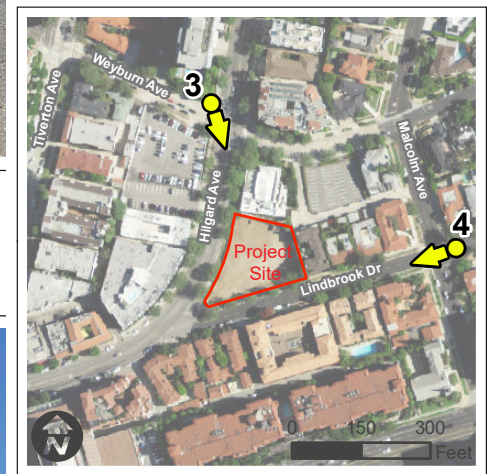
## Figure 12a







View 3



View 4

## Site Photos

*Hilgard Faculty Housing Project*

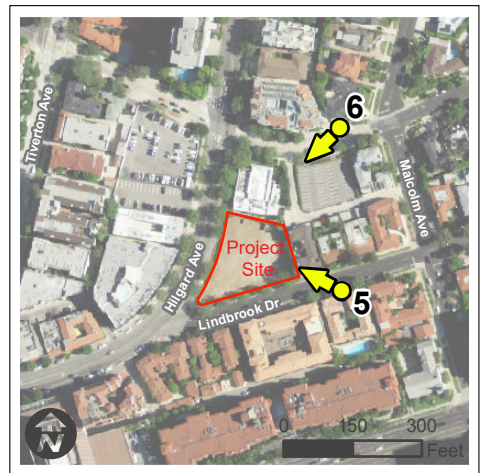
## Figure 12b







View 5



View 6

## Site Photos

*Hilgard Faculty Housing Project*

Figure 12c



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

### Discussion

There are no State scenic highways located near the Project site; the nearest officially designated State scenic highway to the Project site is a portion of State Route (SR) 2 from near La Canada-Fruitridge north to the San Bernardino County line, located approximately 18 miles to the northeast (Caltrans 2019). The proposed Project would not be visible from this roadway due to distance. Therefore, the proposed Project would not substantially damage scenic resources within a state scenic highway and there would be no impact.

While there are no State scenic highways in the vicinity of the Project site, the City of Los Angeles does identify scenic corridors within its City limits. The *Wilshire-Westwood Scenic Corridor Specific Plan* component of the Los Angeles Citywide General Plan designates a portion of Wilshire Boulevard as a scenic corridor. The Project site is north of Wilshire-Westwood Scenic Corridor Specific Plan area, and development of the Project site is not subject to the regulations outlined in the Specific Plan to protect and enhance the scenic resources along Wilshire Boulevard (City of Los Angeles 1981).

### Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

### Level of Significance

There would be no impact to scenic resources within a state scenic highway.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

The Project site, which was previously occupied by the Church auditorium (demolished in 2017), is currently vacant. There is a mix of dense urban development in the Project area with varying architectural styles, building massing, and building heights (refer to the aerial photograph

presented on Figure 13). The Project site is a “gateway” site that straddles two complementary settings in Westwood. Along Hilgard Avenue there are commercial uses, mid-rise apartments, and high-rise residential towers and hotels further north. Along Lindbrook Drive there are two- to four-story residential structures including courtyard apartment houses and large single-family residences. Architectural styles of nearby housing range from “spare” Spanish Colonial, to “30’s Moderne,” to straight-lined Modern or Midcentury expression. The Church building to the north of the Project site is of the latter character.

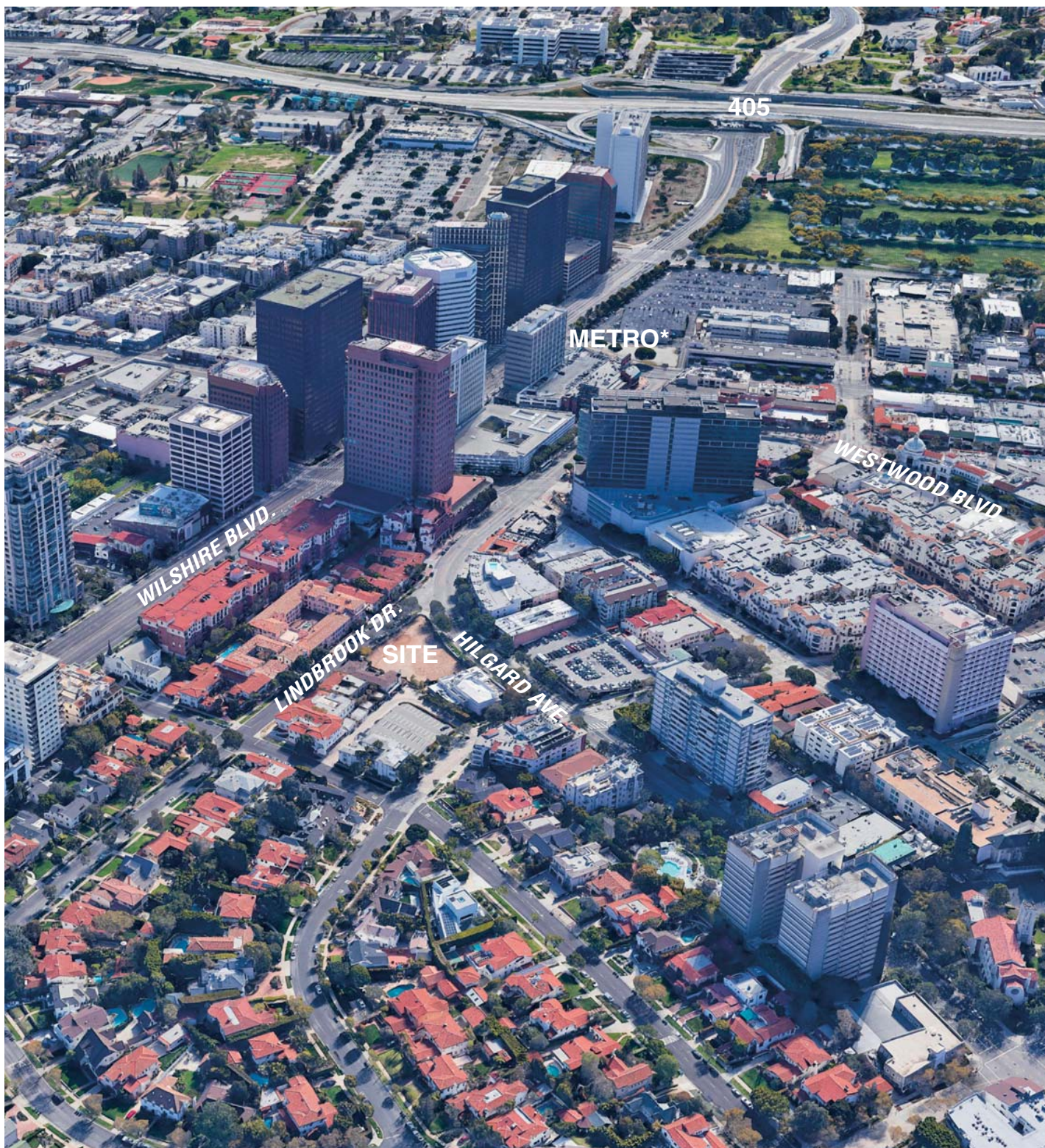
Due to the density of urban development, height of surrounding buildings, and variations in topography, views of the Project site are essentially limited to vantage points along the adjacent roadways, or in immediately adjacent areas. The most prevalent public views of the proposed Project would be from Lindbrook Drive and Hilgard Avenue. The existing visual character of the Project site and surrounding areas, as viewed from nearby vantage points, is depicted in the site photographs provided in Figures 12a through 12c.

- **Views 1 and 2 – Views looking toward the Project site from near the Hilgard Avenue/Lindbrook Drive intersection.** These photographs are representative of the views experienced by pedestrians and motorists traveling east on Lindbrook Drive, south of the Project site. View 1 demonstrates the prominent location of the Project site at this intersection and the transition from commercial uses in the Westwood Village to residential uses. View 2 focuses on the view towards Hilgard Avenue and the relationship of the Project site to the mid-rise residential structure west of the Project site. Mature trees are a focal point in these views and high-rise buildings in the background are visible above the tree line.
- **View 3 and 4 – Views along Hilgard Avenue and Lindbrook Drive.** These photographs are representative of the views experienced by motorists and pedestrians traveling south on Hilgard Avenue and west on Lindbrook Drive toward the Project site. Views of high-rise buildings are prominent in the background and street trees are prominent in the foreground views.
- **View 5 – View of the Project site from Lindbrook Drive.** This photograph is representative of the views experienced by pedestrians and motorists along Lindbrook Drive closer to the Project site. Mature trees continue to be a prominent visual feature and partially obstruct views of the Project site and existing buildings. High-rise development is visible in the background above the tree line.
- **View 6 – View to the southwest from Weyburn Avenue.** This photograph is representative of the views experienced by pedestrians and motorists traveling west on Weyburn Avenue looking toward the existing Church, north of the Project site. Views of the Project site are obstructed by street trees and mature vegetation along the east side of the Church property. Views of high-rise buildings are prominent in the background.

Because the proposed Project is in an urbanized area, the potential impacts of the Project under this threshold are assessed based on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. The UCLA Physical Design Framework, prepared in July 2009 (UCLA 2009a) describes the approach for development of buildings, infrastructure, and landscape on the campus and is not applicable to the proposed Project, which is off campus.

Applicable regulations and restrictions associated with development of the Project site that may be considered relevant to scenic quality are the LRDP Amendment (2017) Final SEIR PPs incorporated into the proposed Project, and height and setback restrictions required by the restrictions and covenants outlined in the Grant Deed. As required by PP 4.1-1(a), the proposed Project would be subject to the University’s design process to ensure that the building design,





Site context looking southwest

\*future metro stop

Source: Moore Ruble Yudel Architects and Planners, 2019

## Oblique Aerial Photograph

*Hilgard Faculty Housing Project*

## Figure 13





architectural details, and landscaping would preserve and enhance the visual character and quality of the area. The deed restrictions for the Project site include: (1) any building developed on the Project site must be setback 20 feet from the southerly wall of the adjacent Church building to the north; (2) any portion of a building on the setback line higher than three stories above ground shall be terraced away from the setback line; and (3) the maximum height of any building shall not exceed 78 feet. As identified above, these restrictions have been included in the DPP as required design elements. The maximum height limit is 78 feet. The height is reduced to five stories along the north property line, with a 5-foot minimum terrace-back at the top of the 3rd floor, and a second 20-foot minimum setback at the top of the fifth floor (refer to Figure 5 of this IS). Enforcement of these restrictions as well as the required elements identified above to ensure an architectural style and design sensitive to the context of the area is ensured through the Campus Architect's review of the final Project designs. Therefore, although evaluation of aesthetics is not required pursuant to SB 743, the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality.

With respect to City of Los Angeles zoning and regulations governing scenic quality, UCLA is part of the University of California, a constitutionally created entity of the State of California. As a constitutional entity, the University of California is not subject to municipal regulations, such as the City of Los Angeles General Plan and the Westwood Community Plan. Westwood and other surrounding communities are part of the City of Los Angeles, and although this jurisdictional separation provides no formal mechanism for joint planning or the exchange of ideas, UCLA may consider (for coordination purposes) aspects of local plans and policies for the communities surrounding the campus but is not bound by those plans and policies in its planning efforts. The campus seeks to maintain an ongoing exchange of ideas and information and to pursue mutually acceptable solutions for issues that confront both the campus and the community. To foster this process, UCLA participates in, and communicates with, City and community organizations and sponsors various meetings and briefings to keep local organizations, associations, and elected representatives apprised of ongoing planning efforts. In particular, the DPP Architect and UCLA leadership held community information meetings regarding the proposed Project. Additionally, during the development of the DPP, UCLA established an advisory committee made up of community members to obtain input in establishing design principles for the proposed Project.

Although not applicable to the proposed Project, the Project site is located within the *Westwood Community Plan* area of the City of Los Angeles (City of Los Angeles 1999). The Project site has a Medium Residential land use designation (City of Los Angeles 2010), and is zoned [Q]R3-1-O, which is a Multiple Dwelling Zone (R3), within Height District 1 (City of Los Angeles 2019a). Most of the multiple family residential development in the Westwood Community is located within several Specific Plans. The Project site is within the East Westwood Village Area of the *Westwood Community Design Review Board Specific Plan* (City of Los Angeles 1988b) and the *Westwood Community Multi-Family Specific Plan* (City of Los Angeles 1988a). Among other purposes, the *Westwood Community Design Review Board Specific Plan* provides guidelines and a process for review and approval of design of buildings proposed for construction within the Specific Plan area, and establishes a Design Review Board to review proposed projects for compliance with the design components and criteria set forth in the Specific Plan. The Design Review Board makes recommendations to the City of Los Angeles Director of Planning. The proposed Project design does not require approval from the City of Los Angeles and will not be reviewed by the Design Review Board; however, a discussion of the proposed Project's relationship to the *Westwood Community Multi-Family Specific Plan* requirements is provided below.

The Westwood Community Multi-Family Specific Plan establishes development standards for development within the Specific Plan area. The regulations of the Westwood Community Multi-Family Specific Plan are in addition to those set forth in the planning and zoning regulations of the City's Municipal Code. However, wherever the Westwood Community Multi-Family Specific



Plan regulations differ from regulations contained in the City's Municipal Code, the Specific Plan prevails and supersedes the applicable provisions of that code. Section 1 of the Westwood Community Multi-Family Specific Plan identifies the purposes of the Specific Plan, which include:

- A. To assure that the development of the area is in accordance with the provisions of the Westwood Community Plan;
- B. To enhance the future development of the area by establishing coordinated and comprehensible standards for parking, height, design, building massing, open space, and landscaping for new projects in the area;
- C. To promote orderly, attractive, and harmonious multiple-family residential development in the Westwood community which takes into consideration the architectural character and environmental setting of the community;
- D. To enhance the aesthetic qualities of multiple-family residential development so that it is more harmonious with adjacent single-family neighborhoods; and
- E. To adequately buffer single-family residential uses from adjacent multiple-family residential development to the greatest extent feasible.

As demonstrated, the purposes of the Specific Plan are largely related to scenic quality. The Westwood Community Multi-Family Specific Plan includes various land use regulations, design standards, and landscape standards. Although not applicable to the proposed Project, regulations and standard that are relevant to scenic quality are discussed below.

- **Building Height.** The established land use regulations in Section 5 of the Specific Plan include building heights, but these restrictions are specific to projects that immediately abut an R1 or more restrictive zone. The Project site does not abut an R1 or more restrictive zone; therefore, the height restriction established by the City of Municipal Code would typically apply. Pursuant to Section 12.21.1, Height of Building or Structures, of the City of Los Angeles Municipal Code, in those portions of the R3 zone that are also in Height District 1, no building or structure shall exceed 45 feet in height. While the proposed Project, with a maximum height of 78 feet, would exceed this height limit, it should also be noted that the Project site, which is within 0.5 mile of a major transit stop, is located within an area subject to the City of Los Angeles Transit Oriented Communities (TOC) Affordable Housing Incentive Program (TOC Program). A housing development located within a TOC Affordable Housing Incentive Area is eligible for TOC incentives if it, among other requirements, provides minimum required percentages of on-site restricted affordable units. Pursuant to the TOC Guidelines (as amended in February 2018) (City of Los Angeles 2018), one of the incentives is a height increase. The additional height allowed is dependent on what Tier the proposed development is in. The Project site is located within a Tier 3 area of this program, which would allow two additional stories (up to 22 additional feet) above the building height limit, resulting in a height limit of 67 feet. However, the Project site is located within 90 feet of the Tier 4 area to the west, which would allow three additional stories (up to 33 additional feet) above the building height limit of 45 feet, resulting in a height limit of 78 feet. This was the basis for the height restrictions imposed on the Project site, as discussed previously. The proposed Project, which involves faculty housing for UCLA, is not eligible for, and is not relying on the provisions of the TOC Program. However, it is important to note that one of the Project Objectives, as outlined in Section II.4 of this IS, is to provide University-owned faculty housing to support recruitment and retention of top-quality faculty for academic programs by providing quality, below-market-priced housing for faculty and their families in close proximity to campus.

- **Building Setbacks.** The required setback for the proposed Project's northern boundary with the Church is discussed above; as identified, the proposed Project is consistent with this setback. The established design standards in Section 6 of the Specific Plan include setbacks, but these restrictions are specific to projects that are directly across the street and within 200 feet of an R1 or more restrictive zone. The Project site does not meet this criterion; therefore, the building setbacks established in Section 12.10, "R3" Multiple Dwelling Zone, of the City's Municipal Code would typically apply.

The proposed Project incorporates LRDP Amendment (2017) Final SEIR PP 4.8-1(e), which is included in the Land Use section of this IS; PP 4.8-1(e) requires that facilities be sited and designed to enhance spatial development while maximizing use of limited land resources. This principle is applicable to the proposed Project to the extent that the DPP includes restrictions in the form of property boundaries and edge controls that respond to the varied urban context on all sides of the property while maximizing the potential building envelope. As shown in Figure 8 of this IS, which depicts property boundary and edge controls, the side yard setback along the proposed Projects' eastern boundary is 11 feet. This is consistent with the side yard setback required by the City's Municipal Code. The City's Municipal Code requires 15-foot front yard setbacks. To maximize use of the site while respecting the surrounding uses and views along Hilgard Avenue and Lindbrook Drive, the proposed building would be restricted to the identified setback and "build-to" line shown on Figure 8. Notably, the front yard building setback on Hilgard Avenue immediately adjacent to the Church is required to match the prevailing setback established by the church, the minimum front yard setback for other portions of the proposed building on Hilgard Avenue is similar to a prevailing setback of a neighboring apartment to the west on Hilgard Avenue, and the front yard setback on Lindbrook Drive is required to match the prevailing setback established by the adjacent building to the east.

- **Garage.** The established design standards in Section 6 of the Specific Plan address parking garages and permit one level of a parking garage above the natural existing grade, up to a maximum of seven feet in height. The parking levels for the proposed Project would be subterranean and would be consistent with this requirement.
- **Landscaping.** The established design standards in Section 6 of the Specific Plan address landscape requirements for yards, and Section 7 of the Specific Plan addresses other landscape requirements. As required by PP 4.1-1(a) and shown on Figure 10 of this IS, the proposed Project would incorporate landscaped areas. The proposed Project would maintain the existing landscaping in the public right-of-way including existing street trees, which are a prominent visual feature as shown in the site photographs. Any trees removed would be replaced. Landscaping would be provided along each side of the building perimeter and within the on-site courtyard.
- **Screening.** Consistent with the requirements of the Specific Plan, any structure on the roof, including mechanical equipment, would be fully screened from view from any adjacent properties, as seen from the grade.

In summary, due to consistency with the SB 743 criteria, potential aesthetic impacts are not considered to be impacts under CEQA for the proposed Project. The preceding discussion includes an assessment of aesthetic impacts for informational purposes. As identified, the only applicable regulations and restrictions associated with development of the Project site that may be considered relevant to scenic quality are the LRDP Amendment (2017) Final SEIR PPs incorporated into the proposed Project, and height and setback restrictions required by the restrictions and covenants outlined in the Grant Deed. The proposed Project does not conflict with these requirements. Further with respect to the provision of City of Los Angeles regulations pertaining to scenic quality, the proposed Project has incorporated various design elements and

building restrictions that serve to meet the intent of these regulations and to ensure the visual character of the proposed Project is compatible with the character of the adjacent neighborhoods.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

The proposed Project would have no impact related to conflict with applicable zoning and other regulations governing scenic quality.

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

### **Discussion**

Due to the highly developed urban nature of the East Westwood Village Area, there is a significant existing amount of ambient light in the Project area. Existing sources of light include street lights, vehicle headlights, and interior and exterior lighting from existing uses surrounding the Project site. The type and amount of lighting that would be implemented with the proposed Project would be similar to existing development in the area, including streetlights, low- and mid-level lighting for pedestrian safety and security, and interior lighting of residences. The additional illumination from the proposed Project would not noticeably increase the intensity of nighttime ambient light from the Project site as compared to existing conditions, including lights from vehicles leaving on-site parking facilities. Additionally, MM 4.1 3(b), which is incorporated into the proposed Project, requires that lighting be specifically directed to the intended illumination site to prevent spill onto adjacent residential areas, and MM 4.1-3(c) requires that ingress and egress from parking areas be designed and situated so vehicle headlights are shielded from adjacent uses.

Glare is a common daytime phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Excessive glare not only restricts visibility but also increases the ambient heat reflectivity (i.e., albedo) in a given area. Potentially reflective surfaces in the Project vicinity include windows on adjacent buildings and automobiles traveling and parked on streets in the Project site vicinity. Consistent with MM 4.1-3(a), non-reflective building materials would be used and glass features would have light, low-reflection tinting to minimize the glare effect. Exterior building materials compliant with DPP requirements adhere to the requirements outlined in MM 4.1-3(a). With the implementation of MM 4.1-3(a), and adherence to DPP requirements, impacts resulting from glare from the new development would be less than significant.

The proposed Project would not result in a substantial new source of light or glare and there would be less than significant impacts related to daytime or nighttime light and glare with incorporation of MM 4.3-1(a), MM 4.3-1(b), and MM 4.3-1(c).

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

The proposed Project would result in a less than significant impact associated with the creation of a new source of substantial light or glare affecting day or nighttime views in the area.

## **2. AGRICULTURAL RESOURCES**

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

### **Project Impact Analysis**

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### **Discussion**

The Project Site is within an area that is not mapped as part of the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), as confirmed by review of the currently available (2016) FMMP Important Farmland Map for Los Angeles County (DOC 2017). No farmland, agricultural activity, forest land, or timberland exists on or in the vicinity of the Project site. The Project site is currently zoned for multiple family residential uses (Q)R3-1-O; the Project site is not zoned for agricultural, forest land, or timberland use; and the Project site is not under a Williamson Act Contract. Therefore, there would be no impact to agricultural or forest land resources with implementation of the proposed Project, and the proposed Project would not result in the conversion of agricultural or forest land.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

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

## **3. AIR QUALITY**

Relevant elements of the proposed Project related to air quality include the excavation and removal of an estimated 23,130 cy of soil and construction and operation of a mid-rise (up to seven stories) residential apartment structure that would accommodate up to 100 apartments with a population of 200 persons. Gross residential floor area would not exceed 120,000 gsf. There would be two levels of subterranean parking (approximately 50,000 gsf). The use of diesel-powered construction equipment would contribute to local and regional emissions (refer to discussion of “Construction Activities” in Section II.5, Proposed Project Components, of this IS). Long-term operational emissions of the proposed Project would include emissions from vehicles used by the residents, consumer products, and natural gas use.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the proposed Project. Therefore, the following PPs and MMs are considered part of the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment (2017) Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed. Changes have been made so the stated requirement better applies to the proposed Project, which is off campus, and would not use unpaved roads.

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

- Minimize land disturbance to the extent feasible.
- Apply water and/or approved nontoxic chemical soil stabilizers according to manufacturer’s specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days).
- Apply water three times daily to all active disturbed areas.
- Replace ground cover in disturbed areas as quickly as possible.
- Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5 percent or greater silt content.
- Water active grading sites at least twice daily.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period.
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code.

- Sweep streets at the end of the day if visible soil material is carried over to adjacent roads.
- ~~Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.~~
- Apply water three times daily or chemical soil stabilizers according to manufacturers' specifications to all unpaved parking or staging areas or unpaved road surfaces.
- ~~Post and enforce traffic speed limits of 15 miles per hour or less on all unpaved roads.~~

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

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

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

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

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

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

In addition, PPs 4.14-2(a), 4.14-2(b), 4.14-2(c), 4.14-2(d), and 4.14-9, included under the Utilities and Service Systems analysis of this IS (Section V.19), requires that the campus continue to implement energy and water conservation measures, which would, in turn, reduce natural gas use and associated air pollutant emissions. PP 4.15-1 included under the Greenhouse Gas Emissions analysis (Section V.8) requires UCLA to continue to implement provisions of the UC Policy on Sustainability Practices, including, but not limited to, Green Building Design; Clean Energy Standards; Climate Protection Practices; Sustainable Transportation Practices; Sustainable Operations; Recycling and Waste Management; Environmentally Preferable Purchasing Practices; and provisions of the applicable UCLA Climate Action Plan (CAP), which would also reduce associated air pollutant emissions.



## **Air Quality Background**

The Project site is located within the South Coast Air Basin (SoCAB), which was named as such since its geographical formation is that of a basin with the surrounding mountains trapping the air and its pollutants in the valleys (or basins) below. The SoCAB is characterized by relatively poor air quality. This area includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. The South Coast Air Quality Management District (SCAQMD) is responsible for ensuring that the approximately 10,743 square-mile SoCAB meets the national and State ambient air quality standards. The regional climate within the SoCAB is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity.

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

## **Regulatory Framework**

A discussion of the regulatory framework for assessing air quality impacts is discussed in Section 4.2, Air Quality, of the LRDP Amendment (2017) Final SEIR and is incorporated by reference. Regulations addressed in the Final SEIR include, but are not limited to, the following, updated as applicable.

The Federal Clean Air Act (CAA) (42 U.S.C. §7401) requires the adoption of National Ambient Air Quality Standards (NAAQS) to protect the public health, safety, and welfare from known or anticipated effects of air pollution. These pollutants are called criteria pollutants. The State of California Air Resources Board (CARB) has established California Ambient Air Quality Standards (CAAQS) for the federal criteria pollutants that are generally more restrictive than the NAAQS, and additional standards for atmospheric sulfates, vinyl chloride, hydrogen sulfide, and visibility. Specific geographic areas are classified as either “attainment” or “nonattainment” areas for each pollutant based on the comparison of measured data with federal and state standards. NAAQS and CAAQS currently in effect, and attainment status for the SoCAB are presented in Appendix A and summarized below (SCAQMD 2019a). The criteria pollutants for which federal standards have been promulgated and that are most relevant to this air quality impact analysis are discussed below and include: ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). O<sub>3</sub> is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Thus, VOCs and NO<sub>x</sub> are O<sub>3</sub> precursors.

As part of its enforcement responsibilities, the United States Environmental Protection Agency (USEPA) requires each State with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain and maintain the federal standards. The California Clean Air Act (CCAA) also requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the CAAQS. The AQMPs from each district are compiled into the California SIP. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

The SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. On March 3, 2017, the SCAQMD adopted the 2016 AQMP (SCAQMD 2017), which is a regional and multi-agency effort (SCAQMD, CARB, SCAG, and USEPA), and is further discussed in the LRDP Amendment (2017) Final SEIR. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* (2016–2040 RTP/SCS) (SCAG 2016); updated emission inventory methodologies for various source categories; and SCAG's latest growth forecasts. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State air quality standards. The 2016 AQMP develops integrated strategies and measures to meet the following NAAQS (SCAQMD 2017):

- 8-hour O<sub>3</sub> (75 parts per billion [ppb]) by 2031<sup>8,9</sup>
- Annual PM<sub>2.5</sub> (12 µg/m<sup>3</sup>) by 2025
- 8-hour O<sub>3</sub> (80 ppb) by 2023
- 1-hour O<sub>3</sub> (120 ppb) by 2022
- 24-hour PM<sub>2.5</sub> (35 µg/m<sup>3</sup>) by 2019

### **Criteria Pollutants and Health Effects**

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

- O<sub>3</sub> is a highly reactive and unstable gas that is formed when VOCs and NO<sub>x</sub> undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma

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<sup>8</sup> On October 1, 2015, the USEPA lowered the 8-hour O<sub>3</sub> standard to 0.070 ppm (70 ppb). The SIP (or AQMP) for the 70 ppb standard is due 4 years after the attainment/non-attainment designations are issued by the USEPA, which occurred in 2017. Thus, meeting the 70 ppb standard will be addressed in a 2021 AQMP.

<sup>9</sup> Some attainment dates have changed since writing of the AQMP; see previous text.

and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for ozone effects.

- **PM10** consists of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles, about 0.0004 inches or less, allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. Particulate matter pollution is a major cause of reduced visibility (haze) which is caused by the scattering of light and consequently the significant reduction in air clarity.
- **PM2.5** is a subgroup of PM10 that consists of smaller particles that have an aerodynamic diameter of 2.5 micrometers or less. PM2.5 is also formed in the atmosphere from gaseous emissions from power plants, industrial facilities, automobiles, and other combustion sources. A consistent correlation between elevated ambient fine particulate matter (PM10 and PM2.5) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. Daily fluctuations in PM2.5 concentration levels have also been related to hospital admissions for acute respiratory conditions in children and to school and kindergarten absences.
- **Nitrogen oxides, including NO<sub>2</sub>**, are typically created during combustion processes and are major contributors to smog formation and acid deposition. NO<sub>2</sub> absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. The strongest health evidence, and the health basis for the ambient air quality standard for NO<sub>2</sub>, is results from controlled human exposure studies that show that NO<sub>2</sub> exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO<sub>2</sub> exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.
- **CO** is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or in wildfires. Because CO is emitted directly from internal combustion engines, motor vehicles operating at slow speeds are the primary source of CO in the urban environment. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. The most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their bodies' already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects.

### **Existing Air Quality Setting**

Specific geographic areas are classified as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with federal and State standards. With respect to federal standards, the SoCAB is designated as an "extreme" nonattainment area for the 1997, 2008, and 2015 8-hour O<sub>3</sub> standards, meaning that the O<sub>3</sub> NAAQS are to be met in 2024, 2032, and 2038, respectively (SCAQMD 2019a). The SoCAB is designated "serious" nonattainment for the 24-hour and annual PM2.5 national standards with attainment dates in 2019 and 2025, respectively. In 2010, the Los Angeles County portion of the SoCAB was designated as a national nonattainment area for lead; redesignation for attainment is expected based on current monitoring data. For all other criteria pollutants, the national designation is attainment or Designations Pending. On the State level, the SoCAB is designated nonattainment for 1-hour and 8-hour O<sub>3</sub>, PM10, and PM2.5.

The SCAQMD has divided the region into 38 source receptor areas (SRAs) in which 37 air monitoring stations operate. The Project site is located within SRA 2, which covers the northwest coastal Los Angeles County area. Ambient air pollutant concentrations within SRA 2 are monitored at the Veterans Administration (VA) Hospital generally at Wilshire Boulevard and Sawtelle Boulevard in West Los Angeles, southwest of the UCLA campus. The VA Hospital monitoring station is located approximately 0.8 mile west-southwest of the Project site. Of the criteria air pollutants, ambient concentrations of O<sub>3</sub> and NO<sub>2</sub> are monitored at this station. The nearest PM<sub>2.5</sub> monitoring sites are in downtown Los Angeles and in Long Beach; the nearest PM<sub>10</sub> monitoring site is near the Los Angeles International Airport. Data from these PM<sub>2.5</sub> and PM<sub>10</sub> sites are not representative of the existing environment at UCLA or the Project site. Monitoring data from the VA hospital site between 2016 and 2018 shows that O<sub>3</sub> concentrations exceeded 2008 National O<sub>3</sub> standard of 0.075 ppm 1 day in 2017, the 2015 national O<sub>3</sub> standard and State standard of 0.070 ppm 2 days in 2016, 3 days in 2017, and 2 days in 2018. No NO<sub>2</sub> standards were exceeded (CARB 2019a).

The Project site is vacant and there are no existing sources of pollutants.

### **Air Quality Sensitive Receptors**

The SCAQMD defines typical sensitive receptors as residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The proposed Project and adjacent uses would be sensitive receptors. The sensitive receptors nearest to the Project site are the adjacent residences to the east, as shown on the aerial photograph in Figure 3 in Section II, Project Description, of this IS. Potential impacts to sensitive receptors are assessed under the analysis of Threshold c below.

### **Methods**

The SCAQMD recommends that projects be evaluated in terms of their quantitative thresholds, which have been established to assess both the regional and localized impacts of project-related air pollutant emissions. The significance thresholds are updated, as needed, to appropriately represent current ambient air quality standards and attainment statuses. UCLA utilizes the SCAQMD-recommended thresholds that are in place at the time development projects are proposed to assess the significance of quantifiable emissions. The current SCAQMD thresholds are identified in Table 1 and are applied to the proposed Project.

**TABLE 1**  
**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**  
**THRESHOLDS OF SIGNIFICANCE**

Mass Daily Thresholds (lbs/day)		
Pollutant	Construction	Operation
VOC	75	55
NOx	100	55
CO	550	550
PM10	150	150
PM2.5	55	55
SOx	150	150
Lead	3	3
Toxic Air Contaminants		
TACs <sup>a</sup>	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO <sub>2</sub> eq for industrial facilities	
Ambient Air Quality For Criteria Pollutants <sup>b</sup>		
NO <sub>2</sub>	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 1-hour average 0.18 ppm (State) Annual arithmetic mean 0.03 ppm (State) and 0.0534 ppm (federal)	
CO	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 1-hour average 20.0 ppm (State) and 35 ppm (federal) 8-hour average ≥ 9.0 ppm (State/federal)	
PM10	24-hour average ≥ 10.4 µg/m <sup>3</sup> (construction) <sup>c</sup> 24-hour average ≥ 2.5 µg/m <sup>3</sup> (operation) Annual average ≥ 1.0 µg/m <sup>3</sup>	
PM2.5	24-hour average ≥ 10.4 µg/m <sup>3</sup> (construction) <sup>c</sup> 24-hour average ≥ 2.5 µg/m <sup>3</sup> (operation)	
SO <sub>2</sub>	1-hour average≥0.25 ppm (State) and 0.075 ppm (federal-99 <sup>th</sup> percentile) 24-hour average ≥ 0.4 ppm (State)	
Sulfate	24-hour average ≥ 1.0 µg/m <sup>3</sup>	
Lead 30-day average Rolling 3-month average	1.5 µg/m <sup>3</sup> (State) 0.15 µg/m <sup>3</sup> (federal)	
lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter with a diameter of 10 micrometers or less; PM2.5: fine particulate matter with a diameter of 2.5 micrometers or less; SOx: sulfur oxides; TACs: toxic air contaminants; SCAQMD: South Coast Air Quality Management District; GHG: greenhouse gas; MT/yr: metric tons per year; CO <sub>2</sub> eq: carbon dioxide equivalent; NO <sub>2</sub> : nitrogen dioxide; ppm: parts per million; µg/m <sup>3</sup> : micrograms per cubic meter.		
<sup>a</sup> TACs (carcinogenic and noncarcinogenic)		
<sup>b</sup> Ambient air quality threshold based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.		
<sup>c</sup> Ambient air quality threshold based on SCAQMD Rule 403		
Source: SCAQMD 2019b.		

## **Project Impact Analysis**

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

### ***Discussion***

As identified above, the applicable AQMP for the proposed Project is the SCAQMD 2016 AQMP. For a specific project to be consistent with the AQMP, the pollutants emitted from the proposed Project should not:

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

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

With respect to Criterion 2, the 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the SCAQMD are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections for the City of Los Angeles is consistent with the AQMP. The proposed Project would provide up to 100 apartment units for UCLA faculty housing and there would be up to 200 residents. The proposed Project would not result in new faculty members beyond that anticipated and evaluated in the UCLA LRDP (2017) Final SEIR. As further discussed in Section V.14, Population and Housing, of this IS, the proposed Project would not conflict with the local or regional growth assumptions, including growth assumptions in the 2016–2040 RTP/SCS, which are consistent with the 2016 AQMP. Therefore, the proposed Project is determined to be consistent with Criterion No. 2.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

The proposed Project would not conflict with or obstruct implementation of the applicable air quality plan. No impact would result.



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

## Discussion

As discussed in the Regulatory Framework section above, the SoCAB is a federal or State nonattainment area for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The proposed Project would generate PM<sub>10</sub>, PM<sub>2.5</sub>, and O<sub>3</sub> precursors (NO<sub>x</sub> and VOC) during short-term construction and long-term operations. The proposed Project would have an incremental, cumulative contribution to O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> levels in the region. SCAQMD's policy with respect to cumulative impacts associated with criteria pollutants and their precursors is that impacts that would be directly less than significant would also be cumulatively less than significant (SCAQMD 2003).

Land uses such as the proposed Project affect air quality through construction-source and operational-source emissions. Emissions from the proposed Project were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 computer program (CAPCOA 2016). CalEEMod is designed to model construction and operational emissions for land development projects and allows for the input of project- and County-specific information. Construction of the proposed Project is modeled to begin in October 2020 and be completed in November 2022. The CalEEMod input for construction emissions was based on the proposed Project's construction assumptions and default assumptions from CalEEMod. The input for operational emissions was based on the vehicle trip generation rates provided in the Traffic Impact Analysis prepared for the proposed Project (Crain 2020) and the proposed building area. Additional input details are included in Appendix A.

### Regional Construction Impacts

Air pollutant emissions during construction activities would primarily occur from construction equipment exhaust; fugitive dust from demolition and site grading; exhaust and particulate emissions from trucks hauling soil and building materials to and from the Project site and from vehicles driven to and from the Project site by construction workers; and VOCs from painting and asphalt paving operations. The proposed Project would comply with the LRDP EIR PPs and MMs described above, which serve to reduce air pollutant emissions.

Table 2 presents the estimated maximum daily emissions during construction of the proposed Project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. As shown, proposed Project construction mass daily emissions would be less than the SCAQMD's thresholds for all criteria air pollutants.

**TABLE 2**  
**ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS**

Year	Emissions (lbs/day)					
	VOC	NOx	CO	SO <sub>2</sub>	PM10	PM2.5
2020	1	37	22	<0.5	2	1
2021	1	9	13	<0.5	2	1
2022	16	12	17	<0.5	2	1
<b>SCAQMD Thresholds (Table 1)</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceeds SCAQMD Thresholds?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SO <sub>2</sub> : sulfur dioxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District. Source: SCAQMD 2019b (thresholds); see Appendix A for CalEEMod model outputs.						

### Operations

Operational emissions are comprised of area, energy, mobile, and stationary source emissions. Area source emissions include consumer products, routine painting, and landscaping equipment and are based on CalEEMod assumptions for the specific land uses and population. Energy emissions are the use of natural gas for cooking and are based on the Project Engineer's estimate of natural gas use. Mobile source emissions are based on estimated Project-related trip generation forecasts, as contained in the Project Transportation Impact Study; the proposed Project would generate 259 weekday daily vehicle trips (Crain 2020). The stationary source is the emergency generator. Estimated maximum daily operational emissions are shown in Table 3.

**TABLE 3**  
**ESTIMATED MAXIMUM DAILY OPERATIONAL EMISSIONS**

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SO <sub>2</sub>	PM10	PM2.5
Area sources	3	<0.5	8	<0.5	<0.5	<0.5
Energy source	<0.5	<0.5	<1	<0.5	<0.5	<0.5
Mobile sources	<0.5	2	6	<0.5	2	1
Stationary source	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
<b>Total Operational Emissions<sup>a</sup></b>	<b>3</b>	<b>3</b>	<b>15</b>	<b>&lt;0.5</b>	<b>2</b>	<b>1</b>
<b>SCAQMD Significance Thresholds (Table 1)</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SO <sub>2</sub> : sulfur dioxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District. <sup>a</sup> Some totals may not add due to rounding. Note: CalEEMod model data sheets are included in Attachment A.						

As shown in Table 3, the proposed Project's operational emissions would be less than the SCAQMD CEQA significance thresholds for all criteria pollutants and no additional mitigation is required. Although not quantified, incorporation of LRDP Amendment (2017) Final SEIR PPs 4.2-2(b) and (c) and MM 4.2-2(a) and (b) into the proposed Project would provide further emissions reductions, principally to NOx and CO.

As shown in Tables 2 and 3, the proposed Project's construction and operational emissions would be less than significant. Therefore, consistent with SCAQMD policy, the cumulative construction and operational impacts of the proposed Project would also be less than significant.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

Construction and operation of the proposed Project would result in a less than significant cumulatively considerable net increase of any criteria pollutant for which the proposed Project region is in nonattainment under an applicable federal or State ambient air quality standard.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### **Discussion**

#### **Construction Emissions**

As part of the SCAQMD's environmental justice program, attention has focused on local air quality impacts from nearby sources. The SCAQMD has promulgated exposure standards and a conservative, simple Localized Significance Thresholds (LST) screening method for construction sites less than five acres in area (SCAQMD 2008a). The LST method provides tables of emissions limits based on the location of a project in the SoCAB, the area of the Project site, and distance to the sensitive receptors. The emissions limits are then compared to the on-site emissions from the proposed Project. Localized impacts are assessed for NO<sub>2</sub> and CO at receptors where persons could be for 1 hour and for PM<sub>10</sub> and PM<sub>2.5</sub> where persons could be for 24 hours.

As previously identified, the closest receptors nearest the Project site are the adjacent residential buildings east of the Project site. Emissions at other receptors would be less than at this location. For the LST analysis for the proposed Project, although the Project site encompasses approximately 0.6-acre, the construction area for the Project site is 1 acre (i.e., the minimum area in the screening tables), and the distance to the sensitive receptor is 25 meters, which is the minimum distance prescribed for the LST methodology for all source-to-receptor distances of 25 meters or less. Based on these parameters, LST emissions and thresholds for the proposed Project are shown in Table 4. Thresholds are specific to Receptor Source Area 2, Northwest Coastal Los Angeles County. Only on-site emissions (i.e., no on-road mobile source emissions) are considered for the LST analysis; therefore, the emissions shown in Table 4 are less than those in Table 2.

**TABLE 4  
LOCAL CONSTRUCTION EMISSIONS TO NEAREST  
SENSITIVE RECEPTORS**

<b>Pollutant</b>	<b>Maximum Daily On-Site Emissions<sup>a</sup> (lbs/day)</b>	<b>LST Thresholds<sup>b</sup> (lbs/day)</b>	<b>Exceed Threshold?</b>
NOx	11	103	<b>No</b>
CO	16	562	<b>No</b>
PM10	1	4	<b>No</b>
PM2.5	1	3	<b>No</b>
lbs/day: pounds per day; LST: Localized Significance Threshold; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; CalEEMod: California Emissions Estimator Model. <sup>a</sup> CalEEMod data sheets are included in Appendix A. <sup>b</sup> LSTs from SCAQMD 2009.			

The peak on-site emissions for NOx, CO, PM10, and PM2.5 would occur during excavation for the subterranean Project elements. As shown, the proposed Project's estimated construction emissions would not exceed the SCAQMD's LSTs, and the impact from exposure to construction emissions at the adjacent and nearby sensitive receptors would be less than significant. No additional mitigation is required.

#### Operational Criteria Pollutant Emissions

With respect to operational vehicular emissions, exposure of sensitive receptors to proposed Project-related pollutants that are generated off site is of concern if the proposed Project contributes substantial traffic to severely congested, high-volume, signalized intersections with an associated potential increase in local CO concentrations (i.e., CO hotspots). An initial screening procedure is provided in the *Transportation Project-Level Carbon Monoxide Protocol* (CO Protocol) to determine whether a project poses the potential to generate a CO hotspot (UCD ITS 1997). The key criterion is whether the Project would worsen traffic congestion at signalized intersections operating at level of service (LOS) E or F. If a project poses a potential for a CO hotspot, a quantitative screening is required.

The Transportation Impact Study prepared for the proposed Project indicates that signalized intersections near the site would not operate at LOS E or worse with and without trips generated by the proposed Project under the Existing and Opening Year scenarios (Crain 2020). Therefore, there would be no potential for a CO hotspot. The impact would be less than significant and no mitigation is required.

Further, according to SCAQMD LST methodology, LSTs would apply to the operational phase of a project if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed Project, which consists of apartments for faculty housing, does not include such uses. Due to the lack of significant stationary source emissions, no long-term localized significance threshold analysis is needed.

### Toxic Air Contaminant (TAC) Emissions

TACs are airborne substances that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. CARB identified particulate exhaust emissions from diesel-fueled engines (diesel particulate matter [PM]) as TACs in 1998. Proposed Project construction would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. The proposed Project would result in the generation of diesel PM emissions from the use of off-road diesel equipment required for construction activities and from on-road diesel equipment used to transport materials to and from the Project site. Exposure is a combination of the emissions rate and the length of time exposed, with exposures calculated over periods of 30 to 70 years. The proposed Project would use relatively little diesel construction equipment. The maximum amount of diesel equipment use would occur during the two-month excavation/grading phase on the Project site and is estimated to be two excavators, one drill rig, and three tractors/loaders/backhoes or equivalent. Diesel trucks would be arriving and leaving the site. The two-month period of excavation/grading would be considerably less than the 70-year exposure time frame. Similarly, the total period of construction would be approximately 2 years, which is also considerably less than the 70-year exposure time frame. Therefore, occupants of the adjacent residences and nearby buildings would not be exposed to substantial toxic air pollutants from construction equipment exhaust. Implementation of the proposed Project would not result in exposure of sensitive receptors to substantial concentrations of TACs. There would be a less than significant impact.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

Construction and operation of the proposed Project would have a less than significant impact related to exposure of sensitive receptors to substantial pollutant concentrations during construction and operation.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### **Discussion**

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

The proposed Project does not propose an odor-generating use identified by the SCAQMD (e.g., wastewater treatment plants, agricultural operations, landfills, composting, food processing

plants, chemical plants, refineries) and would not create an odor nuisance pursuant to SCAQMD Rule 402. Furthermore, none of these odor-generating land uses are located in the vicinity of the Project site. Long-term operations may involve minor odor-generating activities such as cooking, trash facilities, and painting for maintenance purposes. These types and concentrations of odors are typical for residential uses and occur and currently occur in the Project environs. Construction and operation of the proposed Project would not result in other emissions that would be objectionable and would affect a substantial number of people.

#### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

#### **Level of Significance**

The proposed Project would create a less than significant impact associated with other emissions, including odor, affecting a substantial number of people.

#### **4. BIOLOGICAL RESOURCES**

Relevant elements of the proposed Project related to biological resources include the removal of one or more existing mature trees and ornamental vegetation located in the Project area that would be replaced, as described below.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment (2017) Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project, which is off campus.

- PP 4.3-1(a)** *Mature trees to be retained and protected in place during construction, shall be fenced at the drip-line, and maintained by the contractor in accordance with landscape specifications contained in the construction contract.*
- PP 4.3-1(b)** *Trees shall be examined by an arborist and trimmed, if appropriate, prior to the start of construction.*
- PP 4.3-1(c)** *Construction contract specifications shall include the provision for temporary irrigation/watering and feeding of these trees during construction, as recommended by the designated arborist.*
- PP 4.3-1(d)** *Construction contract specifications shall require that no building material, parked equipment, or vehicles shall be stored within the fence line of any tree.*
- PP 4.3-1(e)** *Examination of these trees by an arborist shall be performed monthly during construction to ensure that they are being adequately maintained.*
- MM 4.3-1(a)** *Prior to the onset of construction activities that occur between March and mid-August (February 1 through June 30 for raptors), surveys for nesting special status avian species and raptors shall be conducted ~~on the affected portion of the campus~~ following USFWS and/or CDFW guidelines. If no active avian nests are identified on or within 250 feet of the construction site, no further mitigation is necessary.*



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

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

### **Regulatory Framework**

The LRDP Amendment (2017) Final SEIR, which has been incorporated by reference, includes a detailed discussion of the federal, State, and local regulatory framework for biological resources. As previously discussed, the Project site is located within a developed urban area and was previously developed with the Church auditorium, which was demolished in 2017.

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

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

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

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

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

## **Project Impact Analysis**

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

### ***Discussion***

The Project site is within an urbanized area, is currently vacant, and has been previously disturbed by grading activities. The level of human activity and lack of natural habitat on the Project site and surrounding area results in a wildlife population typical of that found in an urban environment. Vegetation on the site primarily consists of nine mature non-native street trees and turf in the parkway along Hilgard Avenue and Lindbrook Drive. There are also non-native trees (not mature) and other ornamental vegetation on the properties north and east of the Project site. No sensitive plant or wildlife species are known or suspected to exist on the Project site. No impact would result and no mitigation is required.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

The proposed Project would not directly or indirectly impact candidate, sensitive, or special status plant and wildlife species.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The Project site is in an urban area, is currently vacant, and does not contain any riparian habitat, any sensitive natural community, or wetlands. Therefore, there would be no impact and no mitigation is required.

### Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

### Level of Significance

The proposed Project would have no impact on any riparian habitat or other sensitive natural community, nor would it have any impact on State or federally protected wetlands.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

The Project site and surrounding area consist of developed land uses with ornamental vegetation. The Project site does not provide a connection between two areas of open space, does not contain suitable habitat that would be used as a wildlife corridor, and does not facilitate regional connectivity to core wildlife habitat. There are no established wildlife corridors on or near the Project site. The Project site also does not include any marshes, wetlands, or tidal zones that could function as wildlife nursery sites.

However, as further discussed under Threshold e, below, development of the proposed Project would require the removal of one or more of the mature street trees along Hilgard Avenue and Lindbrook Drive. Additionally, vegetation along the northern portion of the Project site where the Church property encroaches into the Project site, and on the adjacent Church property would be removed during construction; vegetation removed on the Church property would be replaced. Common species of bird and raptors that occur on the Project site may nest in these trees and shrubs. Nesting birds and raptors are protected by the MBTA; raptors are also protected by the California Fish and Game Code. The removal or pruning of trees and shrubs to allow for construction of the proposed Project could directly impact nesting birds, including nesting raptors. In addition, the dust, noise, and/or increased human presence associated with Project construction could indirectly impact nesting birds, including nesting raptors. The loss of an occupied nest as a result of construction or demolition activities would constitute a substantial adverse effect (i.e., “take” or “destruction” under Section 3513 of the California Fish and Game Code) and, in the case of raptors, would constitute the “take” or “destruction” of the nest or egg under Section 3503.5 of the California Fish and Game Code. Should construction activities begin during the nesting season for avian species or raptors, the contractor would comply with the requirements outlined in LRDP Amendment (2017) Final SEIR MM 4.3-1(a) and MM 4.3-1(b), which require pre-construction nesting bird surveys and identify protection measures to be implemented if nests are present. With adherence to the requirements established by the MBTA and the California Fish and Game Code, and incorporation of MM 4.3-1(a) and MM 4.3-1(b) into the proposed Project, impacts would be less than significant and no additional mitigation is required.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

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

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

### **Discussion**

Although the University of California is not subject to local zoning and planning ordinances, including the City of Los Angeles Native Tree Protection Ordinance (No. 177404) (LANTPO) (relative to activities occurring on University property), it considers the plans and policies of the City of Los Angeles as part of its planning process. The LANTPO requires the replacement of “protected species,” defined as coast live oak (*Quercus agrifolia*), valley oak (*Quercus lobata*), California sycamore (*Platanus racemosa*), Southern California black walnut (*Juglans californica* var. *californica*), or California bay laurel (*Umbellularia californica*) (City of Los Angeles 1982). Tree replacement mitigation is determined on a case-by-case basis by the Urban Forestry Division of

the Bureau of Street Services (City of Los Angeles), typically at a ratio of 2:1 for these five native species. As described below, none of the trees surveyed at the Project site would be subject to regulation by the LANTPO.

Chapter VI, Public Works and Property, of the City of Los Angeles Municipal Code, includes provisions for removal of street trees (those planted in the public right-of-way). Specifically, Article 2, Section 62.169, states that: “No person shall plant, remove, destroy, cut, prune or deface or in any manner injure any tree, shrub or plant in any street in the City, without first obtaining a permit to do so from the Board.” Removal of trees is subject to a fee, and possibly tree replacement.

A tree survey of the Project site and surrounding area was conducted by a Certified Arborist. As shown on Figure 14, the survey area included all areas within the Project site boundaries as well as adjacent areas. All trees with trunks greater than 12 inches in diameter at breast height (dbh) (mature trees) and any native trees greater than 4 inches dbh were included in the survey. During the survey, the size, height, canopy width, aesthetic value, and overall health of each tree was assessed, and their location was mapped. The tree survey data are provided in Appendix B. A total of 11 mature trees were surveyed, all of which are southern magnolia (*Magnolia grandiflora*) located in the public right-of-way along Hilgard Avenue and Lindbrook Drive. No other trees in the survey area are mature trees, or located within the public right-of-way. It is expected that, at a minimum, one mature street tree (tree No. 3) would be removed to accommodate construction of the driveway access to the parking levels. However, additional street trees may be removed or otherwise impacted during construction activities. Because this tree removal would occur in the City of Los Angeles public right-of-way, it would be subject to the City’s tree removal requirements identified above, including obtaining a tree removal permit, paying the required fee, and potentially tree replacement. Notwithstanding the City’s tree removal requirements, the proposed Project also incorporates MM 4.3-1(c), as modified for the proposed Project, which requires that mature trees (greater than 12 inches dbh) be replaced at a 1:1 ratio.

Although it is anticipated that most of the site-adjacent street trees along Hilgard Avenue and Lindbrook Drive would remain in place, it is possible that these trees could be damaged during construction activities. Protection of these trees would be accomplished through compliance with the City Municipal Code tree protection requirements, and through incorporation of PP 4.3-1(a) through PP 4.3-1(e) identified above, which outlined UCLA’s tree protection requirements.

In summary, one or more mature public street trees along Hilgard Avenue and Lindbrook Drive may be removed and other public street trees adjacent to the Project site could potentially be damaged during construction. Tree impacts would be less than significant through adherence to City of Los Angeles and UCLA tree replacement and protection requirements. Because the Project incorporates these requirements, no conflict with policies regarding tree protection would occur.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

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



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## Tree Locations

Hilgard Faculty Housing Project



Figure 14





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

### **Discussion**

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

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

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

## **5. CULTURAL RESOURCES**

Relevant elements of the proposed Project related to cultural resources include excavation to a depth of up to 24 feet bgs that would extend into native soils, and development of a new apartment building in the vicinity of historic resources. The architectural design of the proposed Project has not been determined at this time. While the design would ultimately be determined by the Design-Build Entity, the DPP outlines guiding design principles for all site and building elements, including site planning strategies, building massing, and articulation. Key required elements for Project design that are relevant to the analysis of impacts to historic resources include the following, which were previously addressed in Section V.1, Aesthetics:

- Maximum 78-foot height limit (seven stories), reduced to five stories along the north property line, with a 5-foot minimum terrace-back at the top of the 3rd floor, and a second 20-foot minimum setback at the top of the fifth floor (refer to Figure 5 of this IS).
- Building massing to express the corner condition at Hilgard Avenue and Lindbrook Drive is required.
- A central courtyard and a courtyard opening on the Lindbrook Drive side of the building that is consistent in character with existing residential buildings in this area.
- Zone of articulation at the two street-front facades to encourage scale and facade treatments (refer to Figure 7 of this IS/MND). This 2- to 5-foot depth is intended for building articulation to break down the scale of the facades; no balconies are allowed.
- Simple masses articulated to create contemporary expression and compositions of light and shadow.
- White, light color cement plaster walls
- Push pull of exterior massing.

- Horizontal shadow lines animate facades.
- Tactile materials and attention to detail provide visual interest for pedestrians.
- Outdoor stairways and open walkways.
- Site walls and gardens that address topography.

The DPP also outlines design principles and guidelines that are not required, but are intended for the new building to respond to local scale and character with a contemporary interpretation. Massing articulation and materiality at the lower-scale Lindbrook Drive is encouraged. At the lower two floors, consideration would be given as to how the building addresses the streets by using front doors, windows, porches, and verandas to define private space. The design should provide facade articulation that speaks to the scale and rhythm of adjacent buildings or makes a meaningful contrast.

The exterior finish material would be primarily cement plaster walls. Accent materials such as ceramic tile, concrete masonry, cast-in-place concrete, and painted accent colors may be used in limited applications to provide articulation to the exterior facade and natural wood. For window and door elements, the DPP encourages projecting window bays and corner windows, and requires overhangs or canopies to protect entry doors. Windows would be organized into multi-story groupings and differentiated between the ground floor and upper floors. They would be operable and aluminum frame with high performance painted coatings. Low-E, high performance glass is preferred though strong tints are unacceptable. The DPP provides a palette of acceptable hardscape materials and plantings.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the proposed Project and are assumed in the analysis presented in this section.

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

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

**MM 4.4-2(b)** *Should archaeological resources be found during ground-disturbing activities for any project, a qualified Archaeologist shall first determine whether an archaeological resource uncovered during construction is a “unique archaeological resource” pursuant to Section 21083.2(g) of the Public Resources Code or a*

*“historical resource” pursuant to Section 15064.5(a) of the CEQA Guidelines. If the archaeological resource is determined to be a “unique archaeological resource” or a “historical resource,” the Archaeologist shall formulate a mitigation plan in consultation with the campus that satisfies the requirements of Section 21083.2 and 15064.5.*

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

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

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

## **Project Impact Analysis**

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## **Discussion**

### **Records Search**

As discussed in the LRDP Amendment (2017) Final SEIR, the South Central Coastal Information Center (SCCIC) conducted a records search for the UCLA campus on February 23, 2016. The results of the records search show that 16 historic resources have been recorded within the

campus boundaries. The Historical Resources Inventory lists 16 historic resources that are either listed or eligible for listing at the federal or State level. An additional 31 historic resources are located outside the campus, within a 0.25-mile radius. Of these, 22 appear eligible for listing at the federal or State level. There have been 52 technical studies conducted on and within a 0.25-mile radius of the campus. Of these, 23 were conducted on the campus. Additional information provided by SCCIC includes site records, report lists, and historic 1902 and 1921 Santa Monica maps for the general area. The records search did not identify any historic resources on the Project site. However, as further discussed below, there are 13 designated and eligible historic resources located on the blocks around the Project site, including three listed Historic-Cultural Monuments (HCMs) and the nearby eligible Holmby Westwood historic district (Page & Turnbull 2019).

### Regulatory Framework

Section 4.4, Cultural and Tribal Cultural Resources, of the LRDP Amendment (2017) Final SEIR, which is incorporated by reference, and the Historic Resource Project Impact Analysis prepared for the proposed Project (included in Appendix C) include a detailed discussion of the regulatory framework for cultural and historic resources, including categories of historic resources, as outlined in Section 15064.5(a) of the CEQA Guidelines, and the thresholds for significant impacts to historic resources as outlined in Section 15064.5(b) of the CEQA Guidelines. In summary, Section 15064.5(a)(2) identifies that “A resource included in a local register of historical resources...shall be presumed to be historically or culturally significant.”

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

- (1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- (2) The significance of an historical resource is materially impaired when a project:
  - (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
  - (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
  - (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California

Register of Historical Resources as determined by a lead agency for purposes of CEQA.

- (3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1997), Grimmer and Weeks, shall be considered as mitigated to a level of less than a significant impact on the historical resource."

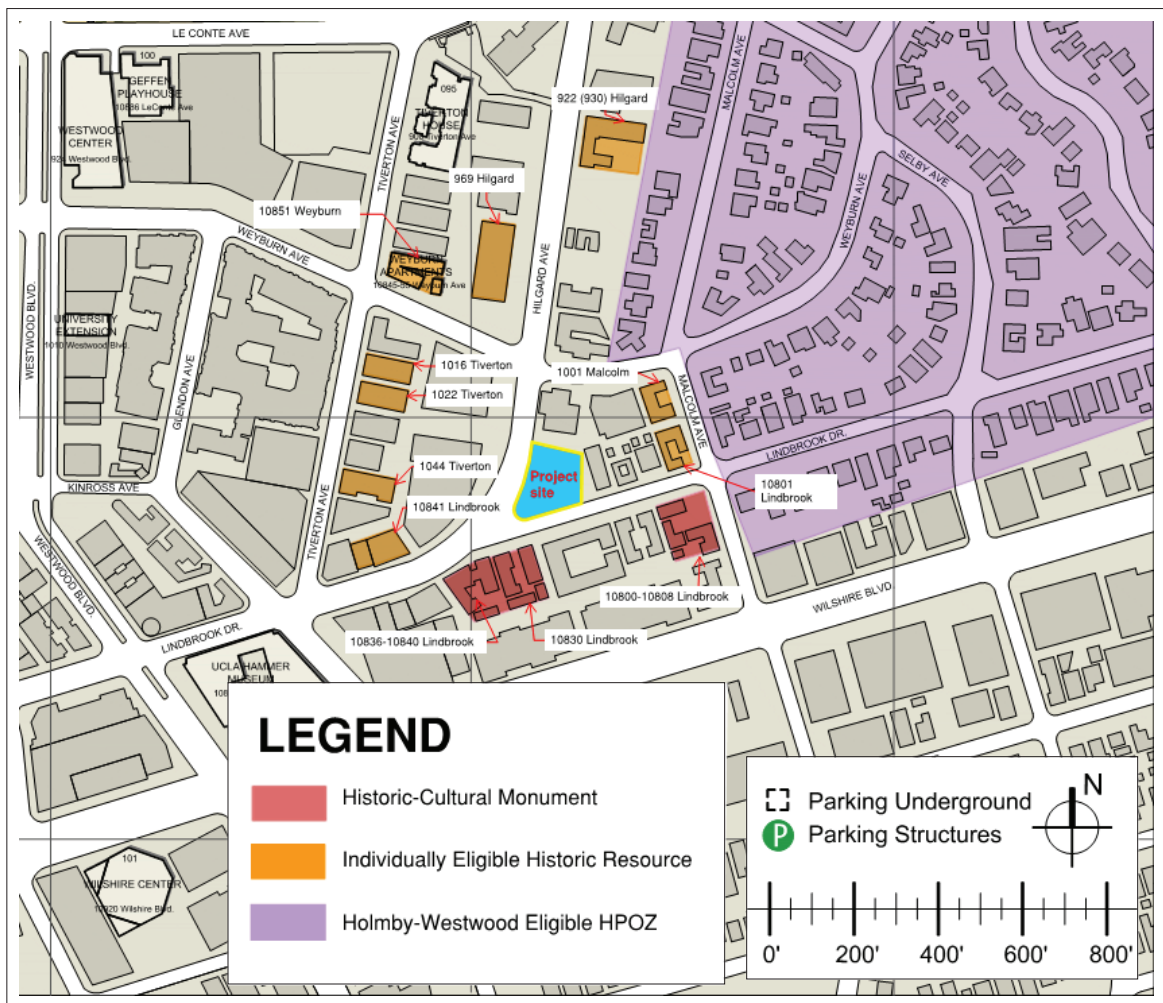
Thus, a project may cause a substantial change in a historic resource but still not have a significant adverse effect on the environment as defined by CEQA, as long as the impact of the change on the historic resource is determined to be less than significant, negligible, neutral, or even beneficial. Projects that comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (the SOI Standards) benefit from a regulatory presumption that they would have a less than significant adverse impact on a historic resource.

#### Known Historic Resources in the Project Vicinity

Thirteen known historic resources are in the immediate vicinity of the Project site (refer to Table 5 and Figure 15). Three are designated City of Los Angeles Historic Cultural Monuments (HCMs) and 10 are eligible historic resources recognized by the City of Los Angeles through SurveyLA and other survey efforts (Page & Turnbull 2019). Brief descriptions and photographs of each property are provided in the Historic Resource Project Impact Analysis included in Appendix C. For the properties identified by SurveyLA, the findings and character-defining features from the survey are also included.

**TABLE 5  
HISTORIC RESOURCES IN THE PROJECT VICINITY**

Designated Historic Resource) (Historic Cultural Monuments)	Eligible Historic Resources <sup>a</sup>	
	Address	Status Code
10800-10808 Lindbrook Drive (HCM 324)	922 Hilgard (or 930 Hilgard Avenue)	5S3, 3CS
10830 Lindbrook Drive (HCM 446)	969 Hilgard Avenue	5S3, 3CS, 3S
10836-10840 Lindbrook Drive (HCM 447)	10801 Lindbrook Drive	5S3, 3CS, 3S
	10841 Lindbrook Drive	5S3, 3CS, 3S
	1001 Malcolm Avenue	5S3, 3CS, 3S
	1016 Tiverton Avenue	5S3, 3CS, 3S
	1022 Tiverton Avenue	5S3, 3CS, 3S
	1044 Tiverton Avenue	5S3, 3CS, 3S
	10851 Weyburn Avenue	5S3, 3CS, 3S
	Holmby Westwood	Eligible Historic District
<sup>a</sup> Most of the eligible resources were identified by SurveyLA, which assigned California Historical Resource Status Codes to the surveyed properties. As defined by the California Office of Historic Preservation (OHP), they mean: <ul style="list-style-type: none"> <li>• 5S3 - Appears to be individually eligible for local listing or designation survey evaluation.</li> <li>• 3CS: Appears eligible for California Register of Historical Resources (CR) as an individual property through survey evaluation.</li> <li>• 3S: Appears eligible for National Register of Historic Places (NR) as an individual property through survey evaluation.</li> </ul>		
Source: Page & Turnbull 2019.		



Source: Page & Turnbull, 2019

## Historic Resources in the Project Site Vicinity

Figure 15

*Hilgard Faculty Housing Project*

PSOMAS



Particularly relevant to the proposed Project are the historic structures across Lindbrook Drive; photographs of these structure are presented in Figure 16:

- **10830 Lindbrook Drive (HCM 446).** Constructed in 1936, this Monterey Revival courtyard apartment is located southeast of the Project site. It was designated as City of Los Angeles HCM No. 446 in 1989. It is two stories in height with an asymmetrical facade. A large balcony spans most of the second story of the north facade, as is characteristic of the Monterey Revival style. It also has a central courtyard, hipped clay tile roof, smooth stucco cladding, and wood-sash casement windows with shutters. 10830 Lindbrook Drive appears to be part of the same complex as 10836-10840 Lindbrook Drive though each were designated as their own individual local landmarks.
- **10836-10840 Lindbrook Drive (HCM 447).** 10836-10840 Lindbrook Drive is a Monterey Revival courtyard apartment similar to and appears to be part of the same courtyard apartment complex as 10830 Lindbrook Drive though they were designated as individual local landmarks. It was originally built in 1936 and designed by architect A.W. Angel. In 1989, it was designated as City of Los Angeles HCM No. 447. Like 10830 Lindbrook Drive, its features include a two-story height, a large partial-width balcony at the second story of the primary facade, a central courtyard, hipped clay tile roof, smooth stucco cladding, and wood-sash casement windows with shutters.

#### Direct Impacts

The Project site is vacant and does not have any historic resources on the property. As such, there would be no direct impacts to historic resources (Page & Turnbull 2019).

#### Indirect Impacts

The assessment of indirect impacts to historic resources resulting from the proposed Project is based on the Historic Resource Project Impact Analysis prepared for the proposed Project included in Appendix C of this IS (Page & Turnbull 2019). Based on the CEQA Guidelines noted above, a proposed project can have a significant adverse impact if it changes the immediate surroundings of a historic resource so that the significance of the resource is “materially impaired.” A historic resource’s significance is materially impaired when it can no longer convey its significance that justifies its eligibility as a historic resource; in other words, when it has lost its integrity. Integrity is the ability of a resource to convey its historic significance through its physical features and is defined as “the authenticity of property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.”

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

- **Location** is the place where the historic property was constructed.
- **Design** is the combination of elements that create the form, plans, space, structure, and style of the property.
- **Setting** addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the building/s.
- **Materials** refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property.



10830 Lindbrook Drive - Designed in Mediterranean Revival style with smooth stucco cladding and wood-sash windows. View looking south.



10836-10840 Lindbrook Drive - Designed in Monterey Revival style. View looking east.



10846-10840 Lindbrook Drive - Clay tile hipped roof, smooth stucco cladding, and stepped massing. View looking southeast.

Source: Page & Turnbull, 2019

# Historic Resources Across Lindbrook Drive

Figure 16

Hilgard Faculty Housing Project



- **Workmanship** is the physical evidence of the crafts of a particular culture or people during any given period in history.
- **Feeling** is the property's expression of the aesthetic or historic sense of a particular period of time.
- **Association** is the direct link between an important historic event or person and a historic property.

For historic districts to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity. In addition, the relationships among the district's components must be substantially unchanged since the period of significance.

As previously identified, the final massing and design of the proposed Project, which is new construction at the Project site, has not yet been developed. However, the new construction would be up to seven stories or 78 feet based on the DPP and deed requirements. Given this scale, the proposed Project has the potential to alter the setting of the area that could indirectly impact historic resources in the vicinity. The setting in closer proximity of the Project site would be affected to a greater extent than the setting further away. The different context to the west along Hilgard Avenue also would be affected differently than the lower scale context to the south and east. The analysis below addresses the historic resources in order of proximity from the Project site.

#### *Corner of Hilgard Avenue and Lindbrook Drive*

The Project site is at the northeast corner of the three-sided intersection of Hilgard Avenue and Lindbrook Drive. At the south side of the intersection are two listed HCMs: 10830 Lindbrook Drive (HCM 446) and 10836-10840 Lindbrook Drive (HCM 447). These Monterey Revival-style courtyard apartment buildings from 1936 are two stories in scale. At the northwest side of the intersection, along the west side of Hilgard Avenue, is the five-story Westwood Village Apartments constructed in 1977 and remodeled in 2019.

The proposed Project's seven-story scale (up to 78-feet high) would be somewhat taller than the Westwood Village Apartments. However, it would surround the two low-scale HCMs with mid-rise buildings that are taller, longer, and generally larger in scale and massing. Already directly behind the HCMs to their south are two six-story multi-family residential buildings of The Legacy at Westwood Apartments, constructed in 2002 on Wilshire Boulevard. The proposed Project would be similarly tall in scale, and would extend along Lindbrook Drive for approximately 130 feet. The DPP requires a courtyard opening along the new construction's Lindbrook Drive facade that would help break up its massing. Other articulation may also be incorporated within the facade's 2- to 5-foot zone of articulation to reflect the lower scale along Lindbrook Drive and minimize the sense of the building's height.

Since the final design of the proposed Project has not yet been determined, the effect of the articulation on the new construction's scale and massing are not known. A conservative analysis of the proposed Project as a seven-story building at the corner of Hilgard Avenue and Lindbrook Drive finds that it would alter the physical environment to such an extent that the integrity of the neighborhood setting for 10830 Lindbrook Drive (HCM 446) and 10836-10840 Lindbrook Drive (HCM 447) would be compromised. Nonetheless, a loss of the integrity of setting would not materially impair the ability of the two HCMs to convey their historic significance. The proposed Project would not physically alter these two properties. They would remain 1930s, Monterey Revival-style courtyard apartment buildings with their integrity of design, materials, workmanship, feeling, and association. Their locations would not change and the internal setting of their



courtyards, which is significant to each property as a courtyard apartment, would not be affected by the proposed Project.

As 10830 Lindbrook Drive (HCM 446) and 10836-10840 Lindbrook Drive (HCM 447) would retain their status as listed Historic-Cultural Monuments in the City of Los Angeles, the proposed Project would have a less than significant impact on these historic resources (Page & Turnbull 2019).

#### *Lindbrook Drive and Malcom Avenue*

Further east on the Lindbrook Drive block of the Project site, at the intersection with Malcom Avenue, are two historic resources. At the southwest corner is 10800-10808 Lindbrook Drive (HCM 324), while the eligible 10801 Lindbrook Drive is at the northwest corner. Both are 1930s Spanish Colonial Revival courtyard apartment buildings. They are generally two stories in scale, though 10800-10808 Lindbrook Drive has one-story elements at the corner and 10801 Lindbrook Drive has an exposed basement/parking at the north side due to the sloping topography. The two buildings are typical of the two- and three-story Period Revival apartments along this block of Lindbrook Drive between the Project site and Malcom Avenue. To the north of 10801 Lindbrook Drive, at the southwest corner of Malcom Avenue and Weyburn Avenue, is another eligible historic resource, 1001 Malcom Avenue. This 1935 Streamline Moderne courtyard apartment building is different in style but has the same scale and massing as the buildings on Lindbrook Drive.

While the proposed Project would alter the setting at the corner of Hilgard Avenue and Lindbrook Drive, it is sufficiently distant that its seven-story scale would not significantly affect the setting of the historic resources at Malcom Avenue. Two- and three-story Period Revival apartment buildings would continue to dominate this block of Lindbrook Drive between the Project site and 10800-10808 Lindbrook Drive (HCM 324) and the eligible 10801 Lindbrook Drive. The proposed Project would appear as part of the background of higher density development along Hilgard Avenue in relation to 1001 Malcom Avenue. As such, the proposed Project would not have a significant impact on the historic resources at 10800-10808 Lindbrook Drive, 10801 Lindbrook Drive, or 1001 Malcom Avenue (Page & Turnbull 2019).

#### *Holmby Westwood Historic District*

In November 2014, a historic resources survey was prepared for the Holmby Westwood neighborhood. This report was prepared for the purposes of an application for Historic Preservation Overlay Zone (HPOZ) designation. It supplemented the work being completed concurrently as part of SurveyLA. The historic resources survey determined that the Holmby Westwood neighborhood was eligible for designation as an HPOZ as an excellent example of residential suburban planning and development from the early automobile era in West Los Angeles and as a cohesive collection of predominantly Period Revival residential architecture in Westwood. The district boundaries were defined by Sunset Boulevard to the north, S. Beverly Glen Boulevard and Comstock Avenue to the east, Lindbrook Drive to the south, and Malcolm Avenue and Hilgard Avenue to the west. The proposed HPOZ contained 1,044 parcels of which 513 were found to be contributors, 139 altered contributors, and 373 non-contributors. Figure 15 depicts the western boundary of the proposed historic district in relation to the Project site. With mixed support for HPOZ designation from property owners, the Department of City Planning terminated work on the proposed Holmby Westwood HPOZ in September 2016. At this time, it is a proposed, inactive residential historic district but is considered a historic resource for the purposes of CEQA (Page & Turnbull 2019).

The proposed Project is not located directly adjacent to the eligible Holmby Westwood historic district. There is sufficient distance between the proposed Project and the district's western edge

that the seven-story height would appear more associated with the higher density development along Hilgard Avenue and would not overwhelm the predominantly one- to two-story single-family residential district. The new construction would not reduce the visibility of the district nor would it significantly affect the setting adjacent to or within the district. As such, the proposed Project would not have an indirect impact on the Holmby Westwood eligible historic district and would not affect its status as a potential Historic Preservation Overlay Zone (HPOZ) (Page & Turnbull 2019).

#### *Hilgard Avenue and Tiverton Avenue*

The historic resources to the west of the proposed Project site have a different context than that found on Lindbrook Drive and to the east. At the corner of Hilgard Avenue and Tiverton Avenue, west of the 1977 Westwood Village Apartments, is the eligible one- and two-story commercial retail building at 18041 Lindbrook Drive. North along Tiverton Avenue between Hilgard Avenue and Weyburn Avenue are three eligible historic resources: the two-story Spanish Colonial Revival-style apartment buildings at 1016 Tiverton Avenue and 1022 Tiverton Avenue, and the three-story Art Deco hotel at 1044 Tiverton Avenue. At the northeast corner of Tiverton Avenue and Weyburn Avenue is also an eligible one- to two-story Spanish Colonial Revival courtyard apartment at 10851 Weyburn Avenue. These eligible historic resources are already in a setting that has been altered by larger-scale mid- and high-rise buildings dating from the 1950s through the 2000s. The seven-story height of the proposed Project would be similar to the mid-rise buildings already on Tiverton Avenue and would not significantly change or overwhelm the existing mid- to high-rise scale. As such, the proposed Project would not have any indirect impacts on the historic resources along Hilgard Avenue and Tiverton Avenue (Page & Turnbull 2019).

#### *Hilgard Avenue North of Weyburn Avenue*

North of Weyburn Avenue are two 1960s high-rise buildings that have been identified as eligible historic resources. 922 Hilgard Avenue (also with the address 930 Hilgard Avenue) was constructed in 1969 as a 15-story, privately-owned, dorm-like housing building. It has been operating as a hotel since 1974 and is currently the W Hotel. Park Westwood at 969 Hilgard Avenue is a 12-story, multi-family residential building constructed in 1961. These two eligible historic resources established a taller scale on the block north of the subject property in the mid-twentieth century. The seven-story Hilgard Faculty Housing project would be smaller in scale and not overwhelm these buildings. It would not significantly alter the setting surrounding 922 Hilgard Avenue and 969 Hilgard Avenue and not have any indirect impacts on these historic resources.

In summary, the proposed Project would not result in a significant indirect impact to historic resources in the vicinity of the proposed Project, and no mitigation is required. However, it should be noted that required Project design elements outlined in Section V.1, Aesthetics, of this IS, are incorporated into the proposed Project, and would serve to lessen the extent that the integrity of the neighborhood setting for 10830 Lindbrook Drive (HCM 446) and 10836-10840 Lindbrook Drive (HCM 447) would be compromised due to the change in physical setting.

#### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

#### ***Level of Significance***

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### ***Discussion***

An archaeological records searches and Sacred Land File Checks performed during preparation of the 1990 and 2002 LRDP EIRs, and the 2008 LRDP Amendment EIRs, did not yield evidence of known archaeological resources located on the UCLA campus and surrounding areas. Further, as identified under Threshold a, above, an updated records search was conducted by the SCCIC for the UCLA campus on February 23, 2016. The records search also concluded that no historic or prehistoric archaeological sites have been recorded on or within 0.25 mile of the campus, including the Project site.

Based on review of the Geotechnical Investigation for the proposed Project and as further discussed in Section V.7, Geology and Soils, of this IS, exploratory borings indicate the Project area is underlain by fill materials up to 15 feet in depth; the fill is underlain by Pleistocene age older alluvium (Geocon 2019). Excavations of up to 24 feet bgs would be required for construction of the proposed Project. Therefore, disturbance of native alluvial sediments would occur during grading and excavation activities and therefore would have the potential to impact previously unidentified archaeological resources. This would be considered a potentially significant impact. The proposed Project incorporates LRDP Amendment (2017) Final SEIR MM 4.4 2(a), which requires an instructional program to assist construction personnel in identifying archaeological resources; MM 4.4-2(b), which describes procedures to be followed in the event that cultural resources are discovered; and MM 4.4-2(c), which requires that projects that would occur on a site with native sediments/soils have a qualified Archaeological Monitor present during earth-disturbing activities and that additional provisions be made for any project where archaeological resources are identified. With incorporation of these MMs, the proposed Project would result in a less than significant impact.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

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



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

### **Discussion**

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

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment in Section 5097 of the California Public Resources Code. Disturbing human remains could violate the health code and destroy the resource and would be considered a significant impact. Final SEIR PP 4.4-5 identifies procedures followed by UCLA in the event that human remains are discovered, including compliance with State law. With incorporation of PP 4.4-5 into the Project, potential impacts related to disturbance of human remains would be less than significant.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

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

## **6. ENERGY**

Relevant elements of the proposed Project related to energy include the use of construction equipment for site excavation and grading followed by building construction for up to 100 apartment units for faculty housing. The proposed Project consists of a new approximately 120,000 gsf apartment building and two levels of underground parking. Operation of the proposed Project would require the direct use of electrical energy for heating and air conditioning (HVAC), lighting, and typical household appliances. Natural gas use would be limited to cooking and clothes drying. Indirect use of electrical energy would be required to provide water and to treat wastewater. The proposed Project would achieve a minimum LEED NC Silver rating.

While this IS/MND is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the proposed Project and is assumed in the analysis presented in this section: PP 4.2-2(b), MM 4.2-2(a), and MM 4.2-2(c) from the Air Quality section, which address requirements for construction equipment; and PP 4.15-1 from the Greenhouse Gas Emissions section, which addresses compliance with the UC Policy on Sustainable Practices.

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

### **Project Impact Analysis**

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

### **Discussion**

#### **Construction**

Construction of the proposed Project would consume energy in the use of fossil-fueled and electrically driven construction equipment, fossil-fueled haul trucks, and fossil-fueled and electrically driven worker commute vehicles. LRDP Amendment (2017) Final SEIR PPs and MMs adopted for the purpose of reducing construction phase air pollutant or greenhouse gas (GHG) emissions also results in positive energy use benefits. PP 4.2-2(b) requires that the equipment be maintained in good condition and in proper tune, and also results in energy efficiency. MM 4.2-2(a) limits idle time on equipment and delivery trucks and also reduces energy consumption. MM 4.2-2(c) requires that diesel equipment be Tier 3 or better, which means that the equipment would be newer and more efficient than older models that might otherwise be used.

Federal and State regulations also promote construction-phase energy efficiency. USEPA regulations require heavy-duty truck engines manufactured after 2014 to meet fuel efficiency standards (USEPA and NHTSA 2011). CARB's Statewide Truck and Bus Regulation requires that heavy-duty diesel vehicles must upgrade to model year 2010 or newer, more efficient engines with separate compliance schedules for lighter and heavier trucks (CARB 2019b). CARB's Diesel-Fueled Commercial Motor Vehicle Idling Regulation requires heavy-duty diesel truck operators to turn off engines after five minutes of idling. 2008 and newer engines are required to be equipped with five-minute automatic engine shutdown system, thus reducing energy use from unnecessary idling (CARB 2016).

The equipment used for proposed Project construction would conform to federal and CARB regulations. There are no unique or unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities nor is the use of any equipment anticipated that would not conform to current requirements relative to fuel efficiency or equipment operation. Therefore, it is concluded that with the implementation of the applicable Final SEIR PPs and MMs, construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, resulting in a less than significant impact.

## Operations

Operational energy uses would include natural gas for cooking and clothes dryers; direct electrical use for HVAC, lighting, and appliances; indirect energy use for process and distribution of water and wastewater; and fossil-fueled and electrically driven residents' vehicles. There are no aspects of the proposed Project that would contribute to wasteful, inefficient, or unnecessary energy consumption. Conversely, as described in Section II.5, Proposed Project Components, and further discussed under Threshold b, below, the following sustainable features of the Project would increase energy efficiency:

- The proposed Project would reduce building energy consumption by at least 20 percent below CBC Title 24 energy efficient requirements.
- The proposed Project would provide efficient water use through LEED and CALGreen requirements and compliance with the UC Policy on Sustainable Practices. This policy is described in detail in Section V.8, Greenhouse Gas Emissions, of this IS. Additionally, recycled/reclaimed storm water would be used for irrigation to reduce the consumption of potable water and associated energy use.
- A solar thermal system will be used to generate heated domestic water; the use of natural gas for hot water heating is prohibited by the UC Policy on Sustainable Practices.
- The proposed Project would be solar PV (photovoltaic) "ready," meaning that the main electrical room would have space, lighting, and other infrastructure to support future PV systems.
- The Project site is located within walking distance to the main campus, public bus lines, the extensive commercial businesses in Westwood village, and the future Metro subway station along Wilshire Boulevard. The Project site is also located in an existing Transit Priority Area, which is an area within 0.5 mile of major transit stops.
- The proposed Project would provide long-term bicycle storage for at least 30 percent of all regular building occupants, but no less than one storage space per residential unit and fixed short-term bicycle storage racks for at least 2.5 percent of all peak visitors, but no fewer than four storage spaces per building.
- Pursuant to LRDP Amendment (2017) Final SEIR PP 4.13-1(d) (discussed in Section V.17, Transportation, of this IS), which is incorporated into the proposed Project, Project residents would have access to a full range of existing campus TDM programs, including, but not limited to: campus transit; accommodations for the use of other modes of transportation, including walking, bicycles, motorcycles, and scooters; on-campus car share program; zip cars; public transit incentives; and use of UCLA's Commuter's Guide.

As described in Section V.17, Transportation, a vehicle miles traveled (VMT) analysis was performed for the proposed Project. For residential uses, the VMT analysis generates a VMT per capita value, which is the VMT produced by the residential component of a development project divided by the number of residents within the development. In order for a proposed development to have a less than significant VMT impact, the project's household VMT per capita must not exceed 15 percent below the average household VMT per capita. The VMT analysis determined that the Project would generate a daily household VMT per capita of 5.2. The Project is located within the West Los Angeles Area Planning Commission area, where the VMT impact threshold criterion is 7.4 daily household VMT per capita. Because the impact threshold is 15 percent below the average household VMT per capita, the average household VMT per capita is calculated to be 8.7 (Crain 2020). The proposed Project's VMT per capita is 5.2; thus, the proposed Project would generate 3.5 VMT less than the area average. Assuming a Project population of

200 persons and an average vehicle fuel use of 30 miles per gallon, the proposed Project would consume approximately 23.4 gallons per day less than the area average.<sup>10,11</sup>

In summary, the proposed Project would conserve energy with solar energy replacing natural gas; building and systems design reducing direct and indirect electrical use; and location resulting in reduced vehicle energy use. Operational energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, resulting in a less than significant impact.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

The proposed Project would result in a less than significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### ***Discussion***

#### **Regulatory Framework**

Although Energy was added in December 2018 as a new topic in the Environmental Checklist included in Appendix G of the State CEQA Guidelines, addressing energy consumption/conservation is not a new requirement. This issue is addressed in Section 6.7, Energy Conservation, and Section 4.6, Greenhouse Gas Emissions, of the LRDP Amendment (2017) Final SEIR, which is incorporated by reference. Various State and/or University regulations, plans, and policies for GHG emissions reduction focus on energy efficiency and renewable energy. State and University regulations addressed in the Final SEIR relative to energy include the following; information has been updated, as appropriate:

- **Executive Order B-30-15.** On April 29, 2015, Governor Edmund Brown signed EO B-30-15, which orders “A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050” (California Climate Change 2019). Three of the five key goals for reducing GHG emissions through 2030 relate to energy: (1) increasing renewable electricity to 50 percent; (2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; and (3) reducing petroleum use in cars and trucks by up to 50 percent.

<sup>10</sup> Average fuel use of 30 miles per gallon based on EMFAC 2017 data for autos and light trucks.

<sup>11</sup> Some Project vehicles may be electric powered and no fuel would be saved but there would be comparable savings in electrical energy required for charging.

- **Senate Bill 350.** SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 implements some of the goals of EO B-30-15. The objectives of SB 350 are (California Legislative Information 2015):
  - (1) To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.
  - (2) To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.The text of SB 350 sets a December 31, 2030, target for 50 percent of electricity to be generated from renewable sources.
- **Title 24 Energy Efficiency Standards.** The Title 24 Energy Efficiency Standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The 2019 version of Title 24 was published on July 1, 2019 and will go into effect on January 1, 2020 (CEC 2018). The California Energy Commission states that single-family homes built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards and nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades. The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption.
- **Title 24 Green Building Standards (CalGreen Code).** The CalGreen Code is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went into effect on January 1, 2011, and is administered by the California Building Standards Commission (CBSC). CalGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 CalGreen Code that will be effective January 1, 2020 (DGS 2019). The CalGreen Code is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.
- **UC Policy on Sustainable Practices.** In June 2004, the UC developed detailed guidelines for the Policy on Green Building Design and Clean Energy Standards. This comprehensive policy established the University as a leader in promoting environmental stewardship among institutions of higher education. Subsequently renamed the Policy on Sustainable Practices, it has been revised several times (with the most recent version becoming effective in July 2019). Notably, the UC Policy on Sustainable Practices covers the areas of green building design, clean energy, and sustainable transportation. Particularly relevant to the proposed Project, the UC Policy on Sustainable Practices, under the category of Green Building Design, requires that major construction projects meet a minimum rating of LEED Silver, outperform Title 24 Energy Efficiency Standards by 20 percent, and register with the Savings By Design program in order to document compliance with the requirement to outperform energy efficiency standards by at least 20 percent (UC 2019).
- **Senate Bill 100.** In September 2018, the Governor signed into law the California Clean Energy Act (SB 100), which accelerated the State Renewables Portfolio Standard (RPS)<sup>12</sup>

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<sup>12</sup> The Renewables Portfolio Standard (RPS) is one of California's key programs for advancing renewable energy. The program sets continuously escalating renewable energy procurement requirements for the State's load-serving entities. Generation must be procured from RPS-certified facilities.



to 60 percent by 2030. The bill also requires that 100 percent of all retail sales of electricity come from eligible renewable energy and zero-carbon resources by 2045.

### Consistency Analysis

The proposed Project would purchase power from the LADWP. LADWP was among the first electric utilities to achieve the first major State legislated target of 20 percent renewables by 2010. In 2016, LADWP achieved a 29 percent renewable portfolio (based on preliminary estimates), surpassing the State legislated requirement of 25 percent renewable energy. LADWP is on track to exceed the next State legislated milestone of 33 percent by 2020. LADWP's long-term targets are more aggressive than State legislation – 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036. LADWP's 2018 Power Strategic Long-Term Resource Plan will incorporate SB 100 and introduce a 100 percent RPS scenario (LADWP 2019a). Thus, the Project is consistent with the renewable energy elements of EO B-30-15, SB 350, and SB 100.

As discussed in Section II.5, Proposed Project Components, and further discussed in Section V.8, Greenhouse Gas Emissions, of this IS, the proposed Project would meet the requirements and intent of the UC Policy on Sustainable Practices as it pertains to energy efficiency, green building, design, and sustainable transportation. The proposed Project would achieve a minimum LEED NC Silver rating, and would outperform the required provisions of Title 24 Energy Efficiency Standards by at least 20 percent. The proposed Project would also be registered with the applicable Savings by Design energy efficiency program and the required documentation for participation in the program would be completed. Further, the proposed Project would comply with CalGreen Code Mandatory Measures. Notable features of the proposed Project to address improving energy efficiency are described in the response to Threshold a above. Therefore, the proposed Project would be implemented in compliance with the UC Policy on Sustainable Practices, Title 24 Energy Efficiency Standard, and the CalGreen Code.

The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

### ***Additional Project-Level Mitigation Measures***

None required.

### ***Level of Significance***

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

## **7. GEOLOGY AND SOILS**

Relevant elements of the proposed Project related to geology and soils include proposed excavation (up to 24 feet bgs) for two subterranean levels and other earth-moving activities, construction of a new residential structure up to seven stories in height, and installation of landscape and utility improvements.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from these two Final SEIRs have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the proposed Project and assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment (2017) Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed. Changes have been made so the stated requirement better applies to the proposed Project, which is off campus.

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

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

**PP 4.5-1(c)** The campus shall continue to comply with the University Policy on Seismic Safety effective May 19, 2017 or with any subsequent revision to the policy that provides an equivalent or higher level of protection with respect to seismic hazards.

**PP 4.5-1(d)** Development projects ~~under the LRDP Amendment~~ shall continue to be subject to structural peer review; following this review, any site-specific geotechnical study recommendations, including any recommendations added as a result of the peer review, shall be incorporated in the project design as appropriate.

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

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

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

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

In addition, PP 4.7-1 and MM 4.7-1 presented in Section V.10, Hydrology and Water Quality, of this IS are also incorporated into the proposed Project.

Section 4.5, Geology and Soils, of the LRDP Amendment (2017) Final SEIR, includes a detailed discussion of the federal, State, and University regulatory framework related to geology and soils and is hereby incorporated by reference. As identified, the national model code standards (i.e., the International Building Code) adopted into Title 24 apply to all occupancies in California except for modifications adopted by State agencies and local governing bodies. The version of the CBC that will be applicable to the proposed Project is the 2019 triennial edition, which will become effective in January 2020 and will supersede the 2016 CBC discussed in the LRDP Amendment (2017) Final SEIR.

Consistent with LRDP Amendment (2017) Final SEIR PP 4.5-1(a), a site-specific geotechnical study was prepared for the Project site by Geocon West, Inc. (August 2019). The *Geotechnical Investigation for the Proposed Multi-Family Residential Development South Hilgard Avenue, Los Angeles, California* (Geocon 2019) is provided in Appendix D. The Geotechnical Investigation involved excavation of four exploratory soil borings to depths between 30.5 feet bgs and 55.5 feet bgs; laboratory testing of representative soil samples collected from the borings; a review of public geologic data and available geotechnical engineering information; and a geotechnical engineering analysis of the proposed Project based on the collected data. The results of the Geotechnical Investigation are summarized in the analysis below, as applicable.

### **Project Impact Analysis**

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

### ***Discussion***

Based on review of available literature and performance of site reconnaissance, the Geotechnical Investigation concluded that there are no known active or potentially active faults with the potential for surface rupture traversing the Project site. The Project site is not within an Alquist-Priolo

Earthquake Fault Zone, as established by the California Geological Survey (CGS), or a City-designated Preliminary Fault Rupture Study Area. Therefore, the potential for surface rupture due to faulting occurring beneath the Project site during the design life of the proposed Project is considered low (Geocon 2019). There would be no impact related to surface rupture of a known earthquake fault.

Other seismic-related hazards investigated in the Geotechnical Investigation include liquefaction and slope stability (i.e., landslides). Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction. The Geotechnical Investigation indicates the Project site is not identified as susceptible to liquefaction on the CGS' Seismic Hazards Zone Map for the Beverly Hills Quadrangle. In addition, the site is not identified as having a potential for liquefaction in the County of Los Angeles Safety Element. As stated previously, the soils encountered at the site are Pleistocene age older alluvial fan deposits, which are typically dense and not prone to liquefaction. Based on these considerations, the Geotechnical Investigation concludes the potential for liquefaction and associated ground deformations (e.g., lateral spreading) at the site is considered very low (Geocon 2019). The proposed Project would not directly or indirectly cause potential substantial adverse effects related to liquefaction.

Regarding landslides, the Geotechnical Investigation states that the topography at the site is relatively level to sloping gently to the south and is not considered susceptible to slope stability hazards. The site is located within a City of Los Angeles Hillside Grading Area but is not located within a City-designated Hillside Ordinance Area. Additionally, the site is not within an area identified as having a potential for seismic slope instability (i.e., earthquake-induced landslides). There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the proposed Project is considered low (Geocon 2019). The proposed Project would not directly or indirectly cause potential substantial adverse effects related to landslides.

#### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

#### ***Level of Significance***

The proposed Project would have no impact related to directly or indirectly causing potential substantial adverse effects from a known earthquake fault, seismic-related liquefaction, and seismic-related landslides.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

The site is in the seismically active southern California region, and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active southern California faults. The nearest surface trace of an active fault to the Project site is the Santa Monica Fault Zone located approximately 0.6 mile to the south. Other nearby active faults are the Newport-Inglewood Fault Zone (1.5 miles to the east), Hollywood Fault (2.3 miles to the northeast), Raymond Fault (11.6 miles to the east-northeast), Malibu Coast Fault (12 miles to the west), and Northridge Fault (12.3 miles to the north). The active San Andreas Fault Zone is located approximately 39 miles northeast of the site. Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers (approximately 1.8 miles). These thrust faults and others in the Los Angeles area are not exposed at the surface and do not present a potential surface fault rupture hazard at the site; however, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the site (Geocon 2019).

The Geotechnical Investigation reports that the Project site is classified as Site Class D, corresponding to a “Stiff Soil” Profile. This classification is used as the basis for seismic design parameters to be implemented for the proposed Project in accordance with 2016 CBC standards, which are currently in effect. Another measure of seismic activity calculated in the Geotechnical Investigation is the Maximum Considered Earthquake Ground Motion (MCE), which is the level of ground motion (i.e., Peak Ground Acceleration [PGA]) that has a 2 percent chance of exceedance in 50 years (2,475-year return period). The Design Earthquake Ground Motion (DE) is the level of ground motion that has a 10 percent chance of exceedance in 50 years (475-year return period). The MCE is to be utilized for the evaluation of liquefaction, lateral spreading, and seismic settlement; and to develop seismic design criteria to maintain “Life Safety” during an MCE event. For the Project site, the Geotechnical Investigation calculated a PGA of 0.859g (i.e., approximately 86 percent the force of gravity) for the MCE (Geocon 2019).

Potential impacts related to strong seismic ground shaking would be less than significant with implementation of (1) recommendations from the Project-specific geotechnical investigation as required by LRDP Amendment (2017) Final SEIR PP 4.5-1(a); (2) compliance with the current CBC (required by PP 4.5-1[a]); (3) incorporation of PP 4.5-1(c), which requires compliance with the University Policy on Seismic Safety; and (4) incorporation of PP 4.5-1(d), which requires structural peer review<sup>13</sup> and incorporation of peer review recommendations into project design. Although there would be less than significant impacts with incorporation of identified PPs, additional Project-level mitigation measure (MM) Hilgard GEO-1 below would be required to

<sup>13</sup> Project-specific structural designs prepared by licensed structural engineers are subject to additional review by another independent licensed Structural Engineer to confirm and validate design appropriateness in accordance with regulatory requirements.



ensure that potential impacts resulting from implementation of the proposed Project remain less than significant.

In summary, the primary geologic hazard on the Project site is moderate to strong ground shaking as a result of an earthquake. The Geotechnical Investigation concludes that neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed Project provided the recommendations presented therein (and required by MM Hilgard GEO-1) are followed and implemented during design and construction. As discussed above, there would be no impact related to liquefaction or landslides, and there would be less than significant impacts related to strong seismic ground shaking with incorporation of LRDP Amendment (2017) Final SEIR PPs 4.5-1(a), 4.5-1(c), and 4.5-1(d). MM Hilgard GEO-1 would be required to ensure that recommendations from the site-specific Geotechnical Investigation are included in the Project design.

### **Additional Project-Level Mitigation Measures**

MM Hilgard GEO-1 would be required to ensure that potential impacts resulting from implementation of the proposed Project remain less than significant by requiring any recommendations from the Project-specific Geotechnical Investigation be incorporated into the Project design, as required by LRDP Amendment (2017) Final SEIR PP 4.5-1(a).

**MM Hilgard GEO-1** *Prior to approval of final building designs for the Hilgard Faculty Housing Project, a qualified Engineer shall review the final designs and contract specifications to verify that all geotechnical recommendations provided in the site-specific geotechnical investigation(s) for the Project site have been fully and appropriately incorporated. At a minimum, the recommendations of the following shall be incorporated: Geotechnical Investigation, Proposed Multi-Family Residential Development, South Hilgard Avenue, Los Angeles, California (dated August 15, 2019 and prepared by Geocon West, Inc.). The recommendations for the Project site would include, but not be limited to, the following geotechnical engineering topics:*

- *Soil and Excavation Characteristics*
- *Minimum Resistivity, pH, and Water-Soluble Sulfate*
- *Grading*
- *Foundation Design*
- *Concrete Slabs-on-Grade*
- *Preliminary Pavement Recommendations*
- *Retaining Wall Design and Drainage*
- *Dynamic (Seismic) Lateral Forces*
- *Elevator Pit Design and Elevator Piston*
- *Temporary Excavations*
- *Shoring (Soldier Pile Design and Installation, including recommendations to address vibration)*
- *Temporary Tie-Back Anchors*
- *Anchor Installation and Testing*
- *Internal Bracing*

- Storm Water Infiltration
- Surface Drainage
- Plan Review

### Level of Significance after Mitigation

There would be a less than significant impact related to seismic ground shaking.

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

### Discussion

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

Earth-disturbance associated with construction of the proposed Project would include removing existing site improvements and vegetation and excavations on the order of 24 feet bgs for the subterranean parking levels and building foundations (Geocon 2019). During construction activities, soil would be exposed and there would be an increased potential for soil erosion compared to existing conditions. Erosion can occur due to, and can be accelerated by, site preparation activities associated with development. Vegetation removal in landscaped (pervious) areas could reduce soil cohesion and reduce the protection from wind, water, and surface disturbance, which could render exposed soils more susceptible to erosive forces. Additionally, excavation or grading for the proposed subterranean parking levels may result in erosion during construction activities, regardless of whether hardscape previously existed at the construction site since exposed bare soils could be more easily eroded by wind or water. Additionally, during a storm event, soil erosion could occur at an accelerated rate.

Construction activities would comply with all provisions of the CBC related to excavation activities, grading activities, erosion control, and construction of foundations and retaining walls to minimize or eliminate soil erosion or loss of topsoil. In addition to compliance with the CBC, the Project would also minimize or eliminate soil erosion through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) as required by LRDP Amendment (2017) Final SEIR PP 4.7-1 and incorporation of Final SEIR MM 4.7-1, which requires implementation of structural, nonstructural, and treatment control BMPs. Final SEIR PP 4.7-1 and MM 4.7-1 are included in Section V.10, Hydrology and Water Quality, of this IS and incorporated into the proposed Project. Although the SWPPP is specifically focused on water quality, as opposed to geology or geotechnical issues, it would specifically incorporate erosion control BMPs. When these required construction-level BMPs are applied, they significantly reduce the erosion potential of any project development to negligible amounts. Erosion control BMPs are designed to prevent erosion and include, but are not limited to, slope stabilization using rock or revegetation, revegetation, and hydroseeding. Incorporation of Final SEIR PP 4.7-1 and MM 4.7-1, as identified in Section V.10, Hydrology and Water Quality, would ensure that potential erosion impacts remain less than significant during construction.

In the long term, because the Project site is primarily exposed soil under existing conditions, the proposed Project would decrease the amount of pervious surface, resulting in less surface area exposed to potential erosion. Soil flowing off site (by wind or water erosion) would be reduced by development and landscaped areas. Areas of exposed soils would be minimal following construction of the proposed Project, and potential erosion impacts would be less than significant during operation.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

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

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

### **Discussion**

The site-specific Geotechnical Investigation identifies that the Project site is underlain by artificial fill materials (to a maximum depth of 15 feet bgs) and native alluvial soils. The Pleistocene-age older alluvium underlying the fill material was deposited by historic river and stream action typical of this area of Los Angeles County and consists of poorly graded to well-graded sand, silty sand, sand with silt, and silt with varying amounts of gravel. The alluvium underlying the Project site was characterized as fine- to coarse-grained, slightly moist to saturated, and loose to very dense or hard.

Review of the *Seismic Hazard Zone Report of the Beverly Hills Quadrangle* (published by the CGS) as part of the Geotechnical Investigation indicates the historically highest groundwater level in the Project area is approximately 25 feet bgs. Groundwater information is generated from data collected in the early 1900s to the late 1990s. Based on current groundwater basin management practices, the Geotechnical Investigation concludes it is unlikely that groundwater levels would ever exceed the historic high levels. Groundwater was encountered in borings B1 and B2 at depths of 52.3 feet bgs and 53.0 feet bgs, respectively. Considering the depth to groundwater encountered in the borings, the Geotechnical Investigation concludes that groundwater is not anticipated to be encountered during construction. However, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal

rainfall. In addition, recent requirements for storm water infiltration could result in shallower seepage conditions in the immediate site vicinity.

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

Laboratory testing indicates the on-site soils are considered corrosive to ferrous metals. The Geotechnical Investigation recommends use of corrosion-resistant ABS (acrylonitrile butadiene styrene), or equivalent, in lieu of cast-iron for subdrains and retaining wall drains beneath the structure. The Portland cement portion of concrete is subject to corrosion when exposed to water-soluble sulfates. The Geotechnical Investigation determined that the water-soluble sulfate content of the soils at the Project site was less than 0.01 percent by weight, considered to be a negligible sulfate exposure. There would be a less than significant impact related to corrosive soils with implementation of MM Hilgard GEO-1, which ensures that recommendations from the Geotechnical Investigation are included in the Project design.

The Geotechnical Investigation determined that the on-site geologic materials have very low to low expansion potential, and are classified as non-expansive and expansive, respectively. The recommendations presented in the Geotechnical Investigation assume that the building foundations and slabs would derive support in these materials. Specifically, the Geotechnical Investigation recommends the structure be supported on conventional spread foundations deriving support in the competent older alluvium. Excavation for the subterranean levels is anticipated to penetrate through the existing fill and expose the underlying alluvium. If needed, the existing artificial fill and site soils are considered suitable for re-use as engineered fill provided all procedures outlined in the grading recommendations of the Geotechnical Investigation are followed (Geocon 2019). These recommendations would be implemented through MM Hilgard GEO-1.

The Geotechnical Investigation concluded that the proposed Project would be feasible with implementation of the geotechnical recommendations outlined in the Project-specific Geotechnical Investigation, as required by LRDP Amendment (2017) Final SEIR PP 4.5-1(a). Therefore, because the proposed Project includes and incorporates Final SEIR PP 4.5-1(a), PP 4.5-1(c), and PP 4.5-1(d) and with the implementation of MM Hilgard GEO-1 to ensure implementation of recommendations from the Geotechnical Investigation, there would be less than significant impacts related to unstable or expansive soils.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

The proposed Project would result in less than significant impacts related to unstable geologic units or soils and expansive soils.

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

### Discussion

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

### Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

### Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

As discussed in Section 4.4, Cultural and Tribal Cultural Resources, of the 2017 LRDP Amendment Final SEIR, which is incorporated by reference, paleontological resources include fossil remains, fossil localities, and formations that have produced fossil material in other nearby areas. Paleontological resources are limited, nonrenewable, sensitive, scientific, and educational resources protected by State and federal environmental laws and regulations. As discussed, rock units identical to those underlying the UCLA campus and surrounding areas have, in nearby contexts, yielded fossils of substantial number and importance, and the potential exists for the rock units underlying the campus and surrounding areas to yield fossils. Accordingly, the rock units underlying the campus and immediately surrounding area, including the Project site, are considered paleontologically sensitive. No unique geologic features are known to exist on the Project site.

As discussed above, the Project site is underlain by fill materials to a maximum depth of 15 feet bgs and native alluvial sediments. Excavations on the order of 24 feet bgs for subterranean



parking and other earth-moving activities would extend into the native alluvial sediments. As such, excavation activities in native alluvium could damage or destroy unknown fossils resulting in a potentially significant impact. The proposed Project would incorporate LRDP Amendment (2017) Final SEIR MM 4.4-3(a), which requires an instructional program to assist construction personnel in identifying paleontological resources and Final SEIR MM 4.4-3(b), which defines the requirements for review and recordation by a qualified Paleontologist of any paleontological resources encountered on a site. With implementation of Final SEIR MM 4.4-3(a) and MM 4.4-3(b), potential impacts related to paleontological resources would be less than significant.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

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

## **8. GREENHOUSE GAS EMISSIONS**

Relevant elements of the proposed Project related to GHG emissions include the development of the Project site with up to 100 apartment units for faculty housing. The proposed Project consists of a new approximately 120,000 gsf apartment building and two levels of underground parking. The primary contributors of operational GHG emissions would be mobile emissions, the direct use of electrical energy and natural gas, and the indirect use of electrical energy to provide water and to treat wastewater. The proposed Project would generate an estimated 259 daily vehicle trips. The proposed Project would achieve a minimum LEED NC Silver rating and would be designed to surpass this to achieve a minimum LEED NC Gold rating.

While this IS/MND is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PP is considered part of the proposed Project and is assumed in the analysis presented in this section.

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

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

## **Greenhouse Gas Background**

### ***Description of Global Climate Change***

Increasing GHG emissions have led to an anthropogenic<sup>14</sup> warming trend of the Earth's average temperature, which is causing changes in the Earth's climate. GHG emissions are primarily associated with (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activities; and (4) solid waste decomposition. This increasing temperature phenomenon is known as "global warming," and the climatic effect is known as "climate change" or "global climate change."

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

Earth's global surface temperatures in 2018 were the fourth warmest since 1880, according to independent analyses by NASA and the National Oceanic and Atmospheric Administration (NOAA). Global temperatures in 2018 were 1.5 degrees Fahrenheit (0.83 degrees Celsius) warmer than the 1951 to 1980 mean. Globally, 2018's temperatures rank behind those of 2016, 2017 and 2015. The past five years are, collectively, the warmest years in the modern record (NASA 2019).

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

Human influence on the climate system is clear. This is evident from the increasing greenhouse gas concentrations in the atmosphere, positive radiative forcing, observed warming, and understanding of the climate system. Human influence has been detected in warming of the atmosphere and the ocean, in changes in the global water cycle, in reductions in snow and ice, in global mean sea level rise, and in changes in some climate extremes. It is *extremely likely*<sup>15</sup> that human influence has been the dominant cause of the observed warming since the mid-20th century.

### ***Greenhouse Gases***

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

GHGs, as defined under the California Global Warming Solutions Act of 2006 (AB 32), include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). General discussions on climate change often include water vapor, atmospheric ozone, and aerosols in the GHG category. Water vapor

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<sup>14</sup> Anthropogenic effects, processes, objects, or materials are those that are derived from human activities, as opposed to those occurring in natural environments without human influence.

<sup>15</sup> "Extremely likely" is defined as the 95 to 100 percent confidence level (IPCC 2013).

and atmospheric ozone are not formed directly in the construction or operation of development projects, nor can they be controlled in these projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by either regulatory bodies (such as CARB) or climate change groups (such as the California Climate Action Registry [CCAR]) as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, atmospheric ozone, or aerosols is provided.

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

Additional background data relative to GHGs; global, national, and State emissions; and the general environmental effects of global climate change are included in the LRDP Amendment (2017) Final SEIR, which is incorporated by reference.

### **Regulatory Framework**

A discussion of the regulatory framework for assessing climate change impacts is discussed in Section 4.15, Greenhouse Gas Emissions, of the LRDP Amendment (2017) Final SEIR and is incorporated by reference. Regulations addressed in the Final SEIR include, but are not limited to, the following, updated as applicable:

#### ***Federal***

The USEPA and the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) have issued rules to reduce GHG emissions and to improve fuel economy for new cars and trucks sold in the United States (USEPA and NHTSA 2011, 2012). It should be noted that, in August 2018, the USEPA proposed the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks that would, in effect, rollback the currently approved standards (USEPA 2018). However, California and four automakers have agreed on fuel efficiency standards that are similar to those adopted in 2012. As of November 2019, the California agreement is being challenged by the Trump administration

#### ***State***

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

- **EO B-30-15** orders a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 to be established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. EO B-30-15 also directs CARB to update the *Climate Change Scoping Plan* to express the 2030 target in terms of MMTCO<sub>2</sub>e.
- **SB 350** is the Clean Energy and Pollution Reduction Act of 2015. SB 350 implements some of the goals of EO B-30-15. The text of SB 350 sets a December 31, 2030, target for 50 percent of electricity to be generated from renewable sources.
- **SB 32** implements a goal of EO B-30-15. Under SB 32, in "adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions," CARB must ensure that statewide greenhouse gas emissions are reduced to 40 percent below the 1990 level by 2030. SB 32's findings state that CARB will "achieve the state's more stringent greenhouse gas emission reductions in a manner that benefits the state's most disadvantaged communities and is transparent and accountable to the public and the Legislature."
- **AB 197**, a companion to SB 32, adds two members to the CARB and requires measures to increase transparency about GHG emissions, climate policies, and GHG reduction actions.
- **The CARB Scoping Plan**, required by AB 32, proposes a comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health. The CARB approved the final *First Update to the Climate Change Scoping Plan* on May 22, 2014. The first update describes California's progress toward AB 32 goals, stating that "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32." Subsequent to preparation of the LRDP Amendment (2017) Final SEIR, in November 2017, CARB released the *Final 2017 Scoping Plan Update*, which identifies the State's post-2020 reduction strategy. The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by Senate Bill (SB) 32. Key programs that the Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes. The 2017 Scoping Plan establishes a new emissions limit of 260 MMTCO<sub>2</sub>e for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

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

#### Title 24 Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (*California Code of Regulations* [CCR], Title 24, Part 6) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The current applicable standards are the 2016 Standards, effective January 1, 2017. The 2019 Code was published on July 1, 2019, and will go into effect on January 1, 2020 (CBSC 2019). The California Energy Commission states that single-family homes built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards and nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades; however, similar data are not provided for multi-family residential buildings. The new code will reduce greenhouse gas emissions by 700,000 metric tons over three years (CEC 2018). The requirements of the

energy efficiency standards result in the reduction of natural gas and electricity consumption. Since natural gas use produces criteria pollutant emissions, a reduction in natural gas consumption results in a related reduction in air quality emissions.

#### Title 24 Green Building Standards

The 2016 California Green Building Standards Code (CCR, Title 24, Part 11) is a code with mandatory requirements for new residential and nonresidential buildings (including buildings for retail, office, public schools, and hospitals) throughout California and became effective on January 1, 2017. The 2019 Code will go into effect on January 1, 2020 (CBSC 2019). The code is Part 11 of the California Building Standards Code in Title 24 of the *California Code of Regulations* and is also known as the CALGreen Code (CBSC 2016).

The development of the CALGreen Code is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

The CALGreen Code contains requirements for construction site selection; storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. It provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

#### University of California Policy on Sustainable Practices

In June 2004, the University of California developed detailed guidelines for the Policy on Green Building Design and Clean Energy Standards. This comprehensive policy established the University as a leader in promoting environmental stewardship among institutions of higher education. Subsequently renamed the Policy on Sustainable Practices, the policy has been revised several times, most recently in July 2019, and has expanded to cover the areas of climate protection, sustainable transportation, sustainable building operations for campuses, zero waste, sustainable procurement, sustainable food services, sustainable water systems, and sustainability at UC Health (UC 2019a). The UC Policy on Sustainable Practices includes climate change goals for the ten UC campuses that, at a minimum, meet AB 32 requirements.

#### University of California Carbon Neutrality Initiative

In November 2013, UC President Janet Napolitano announced the Carbon Neutrality Initiative, establishing goals for UC to emit net zero greenhouse gases from its buildings and vehicle fleet by 2025, something no other major university system has done. The initiative builds on UC's pioneering work on climate research and furthers its leadership on sustainable business practices. UC is improving its energy efficiency, developing new sources of renewable energy and enacting a range of related strategies to cut carbon emissions (UC 2019b). UCLA is in the process of developing a Carbon Neutrality Plan. To get to neutrality in 2025, in addition to deeper energy efficiency, will require increasing on-site biogas, purchasing green energy, and offsetting the remaining emissions (UCLA 2019a).



## University of California, Los Angeles Climate Action Plan

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

## **Regional**

### South Coast Air Quality Management District

Beginning in April 2008, the SCAQMD convened a Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. The Working Group was scheduled to meet once per month. On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold of 10,000 metric tons of CO<sub>2</sub> equivalent per year (MTCO<sub>2</sub>e/yr)<sup>16</sup> for projects where the SCAQMD is the lead agency. In September 2010, the Working Group presented a revised tiered approach to determining GHG significance for residential and commercial projects (SCAQMD 2010). These proposals have not yet been considered by the SCAQMD Board.

At Tier 1, GHG emissions impacts would be less than significant if the project qualifies under a categorical or statutory CEQA exemption. At Tier 2, for projects that do not meet the Tier 1 criteria, the GHG emissions impact would be less than significant if the project is consistent with a previously adopted GHG reduction plan that meets specific requirements.<sup>17</sup> At Tier 3, the Working Group proposes extending the 10,000 MTCO<sub>2</sub>e/yr screening threshold currently applicable to industrial projects where the SCAQMD is the lead agency, described above, to other lead agency industrial projects. The Working Group also proposes the following Tier 3 screening values: either (1) a single 3,000 MTCO<sub>2</sub>e/yr threshold for all land use types; or (2) separate thresholds of 3,500 MTCO<sub>2</sub>e/yr for residential projects, 1,400 MTCO<sub>2</sub>e/yr for commercial projects, and 3,000 MTCO<sub>2</sub>e/yr for mixed-use projects. The screening thresholds are based on estimates that projects with emissions greater than the thresholds would emit 90 percent of the region's GHGs. Therefore, a project with emissions less than the applicable screening value would be considered to have less than significant GHG emissions. Projects with emissions greater than the Tier 3 screening values would be analyzed at Tier 4 by one of the three methods. Projects with GHG emissions not meeting the Tier 4 targets would be required to provide mitigation in the form of real, quantifiable, and verifiable offsets to achieve the target thresholds. The offsets may be achieved through project design features, other on-site methods, or by off-site actions, such as energy efficiency upgrade of existing buildings.

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<sup>16</sup> GHG emissions are commonly expressed as "metric tons of carbon dioxide equivalent" (MTCO<sub>2</sub>e). Larger quantities of emissions, such as on the world or State scale, are expressed in million metric tons of carbon dioxide equivalent (MMTCO<sub>2</sub>e).

<sup>17</sup> The plan must (a) quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; (b) establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable; (c) identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area; (d) specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; (e) establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and (f) be adopted in a public process following environmental review (State CEQA Guidelines Section 15183.5).

As identified in the analysis presented in this section, the proposed Project would not have GHG emissions greater than the Tier 3 screening values; therefore, Tier 4 methods are not applicable.

In summary, to date, the SCAQMD Board has adopted an interim CEQA significance threshold for GHGs for industrial projects where the SCAQMD is the lead agency and continues to consider screening levels under CEQA for residential, commercial, and mixed-use projects. This proposed screening and mitigation proposal from SCAQMD remains a work in progress; the Working Group has not convened since fall 2010. The proposal has not been considered or approved for use by the SCAQMD Board. Thus, no GHG significance thresholds are approved for use in the SoCAB for non-industrial projects.

### ***Existing Emissions***

The Project site is vacant and there are no existing sources of GHG emissions.

### **Project Impact Analysis**

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### ***Discussion***

Construction emissions of carbon dioxide equivalent (CO<sub>2</sub>e) were calculated by using CalEEMod Version 2016.3.2 (CAPCOA 2016), as described in Section V.3, Air Quality, of this IS. The CalEEMod model computes GHG from construction and operations. Construction assumptions are also described in Section V.3 and in Appendix A. The results are output in metric tons per year. Construction emissions would be associated with vehicle engine exhaust from construction equipment, soil haul truck trips, vendor trips, and worker commuting trips. The estimated construction emissions for the proposed Project are shown in Table 6. For estimating annual GHG emissions, the SCAQMD has recommended amortizing construction emissions over the life of a project and a common value for project life is 30 years (SCAQMD 2008b). As shown in Table 6, the 30-year amortized construction emissions would be approximately 34 MTCO<sub>2</sub>e/year.

**TABLE 6  
ESTIMATED CONSTRUCTION GREENHOUSE GAS EMISSIONS**

Year	Emissions (MTCO <sub>2</sub> e)
2020	267
2021	399
2022	339
<b>Total</b>	<b>1,005</b>
<b>Annual emissions for 30-year amortization</b>	<b>34</b>
MTCO <sub>2</sub> e: metric tons carbon dioxide equivalent. Note: CalEEMod model data sheets are included in Appendix A.	

Operational GHG emissions attributed to the proposed Project include natural gas use; purchased electricity; the electricity embodied in water consumption; the energy associated with solid waste disposal; and emergency generator emissions, as well as mobile sources. CalEEMod incorporates mitigation measures based on the California Air Pollution Control Officers Association (CAPCOA) publication *Quantifying Greenhouse Gas Mitigation Measures* (CAPCOA 2010). UCLA has committed to achieving a minimum LEED NC Silver rating for the proposed Project, which would be designed to surpass this to achieve a minimum LEED NC Gold rating. The proposed Project would also implement energy- and water-efficiency measures that would result in increased energy and water efficiency; these measures are described in PPs 4.14-2(a) through 4.14-2(d), PP 4.14-2(g), PP 4.14-3, and PP 4.14-9 under the Utilities and Service Systems analysis (Section V.19, Utilities and Service Systems, of this IS) and in Appendix A.

Estimated operational GHG emissions for the proposed Project are shown in Table 7.

**TABLE 7  
ESTIMATED ANNUAL OPERATIONAL GREENHOUSE GAS EMISSIONS**

<b>Source</b>	<b>Emissions MTCO<sub>2</sub>e/yr</b>
Area sources	<0.5
Energy sources	413
Mobile sources	367
Solid waste	23
Water	70
Emergency generator	1
Amortized construction emissions (Table 7)	34
<b>Proposed Project Total</b>	<b>909</b>
MTCO <sub>2</sub> e/yr: metric tons of carbon dioxide per year.	
Note: Detailed calculations in Appendix A.	

As shown in Table 7, the estimated annual operational GHG emissions for the proposed Project, including amortized construction emissions, are 909 MTCO<sub>2</sub>e/yr. The proposed Project GHG emissions would be less than the SCAQMD-recommended Tier 3 thresholds of 3,500 MTCO<sub>2</sub>e/yr for residential projects or 3,000 MTCO<sub>2</sub>e/yr threshold for all land use types. Thus, the direct and indirect GHG emissions of the proposed Project would not be cumulatively considerable and would result in a less than significant impact.

#### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

#### ***Level of Significance***

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

Threshold(s)	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

### University of California Plans, Policies, and Regulations

The proposed Project incorporates PP 4.15-1, which ensures implementation of applicable provisions of the UC Policy on Sustainable Practices (UC 2019a) and the current UCLA CAP prepared in 2008. The majority of the sustainable practices policies and CAP initiatives are applicable at the UC-wide or campus-wide level and are not applicable to specific projects. Examples are green power purchasing, efficient vehicles and tires for campus fleets, transportation demand programs, and campus outreach programs. Additional policies are applicable to certain types of projects, but not the proposed Project, such as existing building renovation and consolidating server rooms. The UC Policy on Sustainable Practices and UCLA CAP policies applicable to the proposed Project are discussed below.

#### *UC Policy on Sustainable Practices and UCLA Climate Action Plan*

The Policy for **Green Building Design** includes the following goals applicable to the proposed Project:

- “ . . .outperform the CBC energy-efficiency standards by at least 20% or meet the whole-building energy performance targets listed in Table 1 of Section IV.A.3. The University will strive to design, construct, and commission buildings that outperform CBC energy efficiency standards by 30% or more, or meet the stretch whole-building energy performance targets listed in Table 1 of Section IV.A.3, whenever possible within the constraints of program needs and standard budget parameters.” Exceeding Title 24 by 20 percent is also in Climate Action Plan Initiative 11.3.
- No new building or major renovation that is approved after June 30, 2019 shall use on-site fossil fuel combustion (e.g., natural gas) for space and water heating (except those projects connected to an existing campus central thermal infrastructure). Projects unable to meet this requirement shall document the rationale for this decision.
- Design and build all new buildings to a minimum standard equivalent to a LEED NC Silver rating and strive to achieve a standard equivalent to a LEED-NC Gold rating or higher, whenever possible within the constraints of program needs and standard budget parameters. Achieving a minimum Silver rating is also in Climate Action Plan Initiative 11.3.
- Achieve at least two points within the available credits in the LEED Building Design and Construction (BD+C) Water Efficiency category, for new buildings.

As discussed in Section II.5 of this IS, the proposed Project would be designed to achieve a minimum LEED NC Silver rating and to exceed Title 24 requirements by 20 percent. The proposed Project would also comply with CALGreen 2019 mandatory requirements required for non-commercial uses and the CALGreen Tier 1 requirements for Los Angeles County. Further, the Project would participate in the Savings by Design building performance incentive program

administered by public energy utility under the auspices of the California Public Utilities Commission. Further, the proposed Project would include water conservation measures (PP 4.14 2[a] through PP 4.14-2[d]), solid waste conservation measures (PP 4.14-3), and energy conservation measures (PP 4.14-9).

Relevant to the proposed Project, the Policy for **Sustainable Transportation** includes mechanisms for reducing commute emissions, which are also discussed in Climate Action Plan. The Sustainable Transportation policy includes goals to (1) reduce its percentage of employees and students commuting by single-occupancy vehicles (SOV) by 10 percent relative to its 2015 SOV commute rates by 2025, and (2) have no more than 40 percent of its employees and no more than 30 percent of all employees and students commuting to the location by SOV by 2050. The Policy for **Climate Protection** states, “GHG emissions reduction goals pertain to emissions . . . which include . . . commuting to and from campus on a day-to-day basis by students, faculty, and staff.” The Commute Emissions Reduction Initiative 8.2 in the UCLA CAP identifies that reductions in commute emissions would be attained by reducing single occupant vehicle trips to and from campus. As previously discussed, the campus offers a range of alternative mode programs designed to encourage both employee and student commuters to travel to and from campus by means other than driving alone. These programs would be leveraged to induce additional reductions in the drive alone rate. This Initiative also identifies that “...housing students and employees on campus brings these commuters to the doorstep of the campus and largely eliminates their commute carbon footprint.” This Initiative also identifies that “In addition to meeting the growing demand for on-campus student housing, UCLA supports the goal to increase workforce housing for staff and faculty, which currently has an unmet need on campus.” By adding up to 100 new faculty housing units near the campus, which would reduce dependency on vehicles and reduce the drive alone rate, the proposed Project is consistent with this Initiative. As further discussed in Section V.17, Transportation, of this IS, the proposed Project would have a household VMT per capita of 5.2 miles, which is below the threshold of significance for the West Los Angeles Area Planning Commission (APC) area (household VMT per capita of 7.4 miles) (Crain 2020).

The UCLA CAP Commute Emissions Reduction Initiative also acknowledges the planned extension of the Metropolitan Transportation Authority’s (Metro) Rail system to Westwood, providing subway service in proximity to campus and potentially providing significant further reductions in the drive alone rate. The Metro Purple Line extension to Westwood has been initiated and is expected to be completed by 2026. The Westwood/UCLA Station is approximately 0.25 mile from the Project site and would be easily accessible to Project residents, reducing the drive alone rate.

The Policy for **Zero Waste** indicates that the University will achieve zero waste by 2020 at all locations other than health locations. Minimum compliance for zero waste is 90 percent diversion of municipal solid waste from landfill. The proposed Project would be required to comply with UCLA’s programs in place to reduce the amount of solid waste diverted to landfills during construction and operation. Notably, to comply with this requirement, the proposed Project would include infrastructure for three waste streams (recycling, compost and landfill).

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

#### *University of California Carbon Neutrality Initiative*

The UC Carbon Neutrality Initiative establishes goals for UC to emit net zero greenhouse gases from its buildings and vehicle fleet by 2025 (UC 2019b). UCLA is preparing a Carbon Neutrality Plan and is in the process of refining initiatives and programs for implementation. The proposed



Project would be constructed and operated in compliance with applicable provisions of UCLA's Carbon Neutrality Plan.

### State and Regional Plans, Policies and Regulations

#### *Assembly Bill 32*

The primary State policy document is AB 32. While many of the AB 32 policies are statewide actions and are not applicable to the proposed Project (e.g., the low carbon fuel standard, goods movement, and high-speed rail), the proposed Project supports the following AB 32 policies:

- **Energy Efficiency.** As discussed above, the proposed housing project would reduce building energy consumption by at least 20 percent below Title 24 requirements.
- **Green Buildings.** The proposed Project has been designed to surpass the minimum standard LEED Silver rating. To achieve this rating, the design, construction, and operation of the proposed Project would incorporate a series of green building strategies. The proposed Project would also comply with CALGreen 2019 mandatory requirements required for non-commercial uses and the CALGreen Tier 1 requirements for Los Angeles County. Further, the Project would participate in the Savings by Design building performance incentive program administered by public energy utility under the auspices of the California Public Utilities Commission.
- **Recycling and Waste.** This policy includes a measure for high recycling/zero waste. Although the AB 32 measure focuses primarily on commercial recycling, the UC Zero Waste policy contributes to achieving this policy.
- **Water.** The first measure of the AB 32 Water policy is Water Use Efficiency. The proposed Project would provide efficient water use through LEED and CALGreen requirements and compliance with the UC Policy on Sustainable Practices. Additionally, condensate water from all heat pumps shall be captured and will be used for irrigation to reduce the consumption of potable water.
- **Clean Transportation.** The proposed Project would provide chargers for plug-in electric vehicles (PEVs) for 10 percent of the total parking spaces. The size the service equipment, submeters, and transformer(s) would also be designed for future additional charging stations.

#### *Executive Orders S-3-05, B-30-05, and SB32*

Executive Order (EO) S-3-05 sets a goal of a reduction of GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. AB 32 was enacted after EO-S-3-05 was signed. The Legislature declined to include the Executive Order's 2050 goal in AB 32, and again declined to use the EO's goal in adopting SB 375 and SB 32. EO B-30-15, as previously discussed, sets a new interim statewide goal for greenhouse gas emission reduction target of reducing greenhouse gas emissions to 40 percent below 1990 levels by 2030. This measure is intended to ensure California meets the goal set out in EO S-3-05 of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050 (COOG 2015). SB 350 was signed into law and, as noted above, it requires the State to double energy efficiency savings in electricity and natural gas by retail customers by 2030 and raises the Renewables Portfolio Standard (RPS) so that half of the State's electricity must be procured from renewable sources by 2030. Subsequently, SB 32 adopted the 2030 target identified in EO B-30-15. The 2050 target remains a goal of EO S-3-05 and, although it is part of the regulatory setting, is not a binding mandate.

Actions to implement EO B-30-15 and SB 32 are contained in the *Final 2017 Scoping Plan Update*. The elements of the Scoping Plan Update are primarily for action at the State level, such as an increased Low Carbon Fuel Standard and putting 4.2 million zero-emission vehicles on the roads; or by specific industries, such as improving freight system efficiency and reducing GHG emissions at refineries. Thus, the proposed Project would not conflict with those elements.

However, the proposed Project would support a goal of the SB 350 element of the Scoping Plan Update, i.e., doubling of energy efficiency savings by 2030. The proposed Project would exceed current Title 24 energy efficiency standards by at least 20 percent. With respect to renewable energy, a solar thermal system will be used to generate heated domestic water. As noted above, the use of natural gas for hot water heating is prohibited by UC policy. Further, the proposed Project would be solar photovoltaic (PV) “ready,” meaning that the main electrical room would have space, lighting, and other infrastructure to support future PV systems. The proposed Project would not conflict with EO S-3-05, EO B-30-15, or SB 32.

#### *Senate Bill 375 and the SCAG 2016–2040 RTP/SCS*

A primary goal of SB 375 and the SCAG 2016–2040 RTP/SCS is to reduce GHG emissions by reducing vehicle trips and associated VMT. Methods to reduce VMT include locating residents closer to where they work and play; designing walkable environments; and providing access to high-quality transit service. The proposed Project would contribute to these VMT reduction goals by providing the following benefits:

- The Project site is located within walking distance to the main campus, public bus lines, the extensive commercial businesses in Westwood village, and the future Metro subway station along Wilshire Boulevard. The Project site is also located in an existing Transit Priority Area, which is an area within 0.5 mile of a major transit stop.
- The proposed Project would provide long-term bicycle storage for at least 30 percent of all regular building occupants, but no less than one storage space per residential unit and fixed short-term bicycle storage racks for at least 2.5 percent of all peak visitors, but no fewer than four storage spaces per building.
- Pursuant to PP 4.13-1(d) (discussed in Section V.17, Transportation), which is incorporated into the proposed Project, UCLA actively provides and promotes accommodation of the use of other modes of transit, including bicycles, motorcycles, and scooters; a car share program; annual distribution of the UCLA Commuter’s Guide; and parking control management.

Therefore, implementation of the proposed Project would be consistent with SB 375 and the SCAG 2016–2040 RTP/SCS.

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

#### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

## **Level of Significance**

The proposed Project would have a less than significant potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

## **9. HAZARDS AND HAZARDOUS MATERIALS**

There are no relevant elements of the proposed Project specifically related to hazards and hazardous materials.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs are considered part of the proposed Project and assumed in the analysis presented in this section. A change in the text from the LRDP Amendment (2017) Final SEIR is signified by ~~strikeout~~ (strikeout) where text has been removed; this change has been made so the stated requirement better applies to the proposed Project, which is off campus.

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

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

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

## **Project Impact Analysis**

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

## **Discussion**

### **Construction-Related Hazards**

The Project site is currently undeveloped and fenced; the site was cleared and graded following demolition of the former Church main auditorium structure in 2017. The transport, use, and handling of hazardous materials on the Project site during construction is a standard risk on all construction sites, and there would be no greater risk than would occur on any other similar construction site. Construction equipment (e.g., dozers, excavators) that would operate on the Project site during construction is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA, California Department of Toxic Substances Control (DTSC), SCAQMD, Regional Water Quality Control Board (RWQCB), and UC. With mandatory adherence to applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

### **Contaminated Soil and/or Groundwater**

A *Phase I Preliminary Site Assessment Due Diligence Report for the Acquisition of Campus-Related Property* (Phase I Report) was prepared for the Project site by UCOP in accordance with the ASTM Practice E1527 for preparation Phase I Environmental Site Assessments (UCOP 2018). The Phase I Report is included in Appendix E of this IS. Historical uses of the Project site have been institutional (i.e., church-related buildings). The Phase I Report revealed no evidence of Recognized Environmental Concerns (RECs) in connection with the site. Additionally, the surrounding uses are multi-unit residential and institutional and pose little risk for RECs at the Project site. The Phase I Report concludes that no further investigation is warranted (UCOP 2018). Based on the results of the Phase I Report, there are no known current or historical sources of hazardous materials at the site. Therefore, no hazardous materials are anticipated to be encountered in the soils underlying the site during excavation activities and there would be no

significant hazard to the public through reasonably foreseeable upset and accident conditions of construction of the proposed Project.

UCLA has never had a documented instance of contaminated soil and/or groundwater caused by construction or operational activities on UCLA-owned properties; however, there is always the potential for previously undiscovered underground storage tanks (USTs) or other undetected soil or groundwater contamination to be exposed because of construction activities. In the event that previously undiscovered USTs are uncovered or disturbed, they would be closed in place or removed in accordance with applicable State regulations. Groundwater was encountered in borings B1 and B2 at depths of 52.3 feet bgs and 53.0 feet bgs, respectively (Geocon 2019). Considering the depth to groundwater encountered in the borings, the Geotechnical Investigation concludes that groundwater is not anticipated to be encountered during excavation activities, which are expected to a depth of approximately 24 feet bgs. However, if any contaminated soil and/or groundwater is discovered, all construction activities shall stop, and an assessment would be made of the nature and extent of contamination and the type (if any) of remediation that is required. The primary purpose of LRDP Amendment (2017) Final SEIR PP 4.6-4 is to ensure that the exposure of contaminated soil and/or groundwater or the remediation activities, if necessary, would not expose the public or construction workers to hazardous conditions. Continued compliance with all applicable federal, State, and local laws and regulations, as well as incorporation of Final SEIR PPs 4.6-1 and 4.6-4, would ensure that impacts associated with the potential exposure of contaminated soil or groundwater is less than significant.

#### Operational Hazards

The proposed Project involves the development of off-campus faculty housing; it would not involve the development of new laboratories, research facilities, or other sources of new or increased handling of hazardous materials. There would also be no change in how hazardous materials are handled, stored, transported, or disposed of on and off campus, and the potential for accidents involving hazardous materials would not increase. Operations associated with the proposed faculty housing would be consistent with the existing residential uses in the Project area. The types of hazardous materials that could be used in association with the proposed Project would not require disposal. Cleaning products would be disposed of either through the wastewater system (i.e., sinks, laundry) or evaporation. Neither chlorine nor standard cleaning products (i.e., degreasers, window-cleaning products) are used in quantities that would result in adverse health effects either through direct exposure to the skin or inhalation. Pesticides and herbicides are directly applied to affected areas using methods that follow State and County laws and/or guidelines. Additionally, operation of the proposed Project would comply with applicable federal, State, and local laws and regulations and with the existing (or equivalent) PPs that are required by LRDP Amendment (2017) Final SEIR PP 4.6-1 identified above. Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous material, or reasonably foreseeable upset and accident conditions involving the release of hazardous materials. There would be a less than significant impact during operation.

#### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

#### ***Level of Significance***

The proposed Project would have a less than significant impact related to the routine transport, use, and disposal of hazardous materials, and a less than significant impact related to reasonably

foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion

Besides the UCLA campus, which is approximately 0.2 mile north of the Project site, the Geffen Academy at UCLA is the nearest school (approximately 0.28 mile west of the Project site). As discussed under Threshold a, above, the proposed Project includes faculty housing which would not involve hazardous emissions, and would not involve the handling of hazardous or acutely hazardous materials in quantities significant enough to pose a risk to occupants of the school or the campus community. With continued compliance with federal, State, and local regulations pertaining to hazardous materials and with existing (or equivalent) campus programs and procedures, as required by LRDP Amendment (2017) Final SEIR PP 4.6-1, this impact would be less than significant.

### Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

### Level of Significance

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

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

### Discussion

The Project site was previously developed with an institutional (church-related) land use since the property was first developed in the 1930s, and there are no known current or historical sources of hazardous materials at the site. The Phase I Report concludes there are no regulatory agency records of any hazardous material-related issues or releases on the site or surrounding vicinity (UCOP 2018). This is confirmed with a current review of databases compiled by the California Environmental Protection Agency pursuant to Section 65962.5 of the California Government Code



(the “Cortese List”) and as required by Section 21092.6 of the California Public Resources Code, which includes, but is not limited to, the California Department of Toxic Substances Control Hazardous Waste and Substances Sites database, Leaking Underground Storage Tanks (LUST) database, selected solid waste disposal sites, and hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the California Health and Safety Code (CalEPA 2019). The Project site is not located on an identified hazardous materials site; therefore, there would be no impact.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

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

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

### **Discussion**

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

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

The Project site is located approximately 0.5 mile to the southeast of the RRUCLAMC helistop. The proposed Project would include construction of a structure up to seven stories, with a

maximum height of 78 feet. The elevation of the Project site is relatively lower—approximately 327 feet above msl—than the RRUCLAMC, which lies at an elevation of approximately 350 feet above msl. The helipads are located on top of a ten-story building from which the 8:1 approach/departure surface is determined. Based on the Project site elevation and proposed building heights, the proposed structure would not penetrate the established 8:1 approach/departure surface. Also, the proposed structure is not taller than many existing structures in the wider Project area, particularly along nearby Wilshire Boulevard.

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

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

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

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

### **Discussion**

Neither Hilgard Avenue nor Lindbrook Drive are designated as disaster routes in *the City of Los Angeles General Plan's* Safety Element (Exhibit H, Critical Facilities and Lifeline Systems) (City of Los Angeles 1996). Although construction activity associated with implementation of the proposed Project is anticipated to occur within the boundaries of the Project site and most staging would also occur on site, some construction staging (e.g., short-term construction vehicle parking at the curb, dumpsters) and utility infrastructure improvements (e.g., pipeline connections) for the proposed Project could periodically occur for short periods on Hilgard Avenue and Lindbrook Drive.

However, this short-term and limited encroachment into the public roadways would not impede access to RRUCLAMC, identified as an "Other Major Hospital" (City of Los Angeles 1996) and located approximately 0.5 mile northwest of the Project site at the nearest point. Also, UCLA would be required to obtain all necessary encroachment permits from the City of Los Angeles Department of Transportation prior to any construction activity occurring in the Hilgard Avenue and Lindbrook Drive rights-of-way. Ongoing coordination between the University of California Police Department, the City of Los Angeles Fire Department, and UCLA pursuant to LRDP

Amendment (2017) Final SEIR PP 4.13-8 (refer to Section V.17, Transportation, of this IS) ensures that roadway or travel lane closures would be coordinated with emergency response personnel to ensure that individual development projects would not impair implementation of, or physically interfere with, emergency response and evacuation efforts. The Project incorporates Final SEIR PP 4.13-8, which ensures that required emergency access to and surrounding the Project sites would be maintained during construction. Therefore, there would be a less than significant impact.

**Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

**Level of Significance**

The proposed Project would have a less than significant impact related to implementation of or physical interference with an adopted emergency response plan or emergency evacuation plan.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion**

The Project site is not located in a Selected Wildland Fire Hazard area as shown in Exhibit D of the City of Los Angeles General Plan's Safety Element (City of Los Angeles 1996). Implementation of the proposed Project would not expose people or structures to wildland fires. No impact would result. The nearest wildland area is the Santa Monica Mountains and associated foothills, located approximately 1.5 miles to the north with intervening urban development. There would be no impact.

**Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

**Level of Significance**

The proposed Project would result in no impact related to wildland fires.

**10. HYDROLOGY AND WATER QUALITY**

Relevant elements of the proposed Project related to hydrology and water quality include an increase in impervious surfaces on the Project site, which is currently undeveloped with a primarily pervious surface. Structural and non-structural BMPs would be used to capture and treat runoff as described in Section II.5, Proposed Project Components, and per MM 4.7-1, which would manage the post-development hydrology in compliance with all applicable regulations. The conceptual utility plan anticipates installation of a cistern in the southwestern corner of the Project site, which would capture and hold runoff to be used for irrigation.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the proposed Project and are assumed in the analysis presented in this section. A change in the text from the LRDP Amendment (2017) Final SEIR is signified by ~~strikeout~~ (strikeout) where text has been removed; this change has been made so the stated requirement better applies to the proposed Project, which is off campus.

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

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

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

*Non-Structural/Structural*

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

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

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

**Project Impact Analysis**

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

**Discussion**

**Surface Water**

Section 4.8, Hydrology and Water Quality, of the LRDP Amendment (2017) Final SEIR, includes a detailed discussion of the regulatory framework for hydrology and water quality relevant to the Project site, and is incorporated by reference. In summary, the State Water Resources Control Board (SWRCB) and the nine RWQCBs are responsible for the protection of water quality in California; the Project site is within the Los Angeles RWQCB (LARWQCB). The SWRCB establishes statewide policies and regulations for implementing water quality control programs mandated by federal and State water quality statutes and regulations. The RWQCBs develop and implement Water Quality Control Plans (Basin Plans) that consider regional beneficial uses, water quality characteristics, and water quality problems. The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which is further discussed under Threshold e, below, implements a number of federal and State laws for the proposed Project area, the most important of which are the State Porter-Cologne Water Quality Control Act and the Federal Clean Water Act.

Pursuant to CWA Section 402(p), which requires regulations for permitting of certain storm water discharges, the SWRCB issued a statewide general NPDES Permit for storm water discharges from construction sites,<sup>18</sup> herein referred to as the “Construction General Permit.” Under this Construction General Permit, discharges of storm water from construction sites with a disturbed

<sup>18</sup> NPDES No. CAS000002, Water Quality Order 2009-0009-DWQ, SWRCB NPDES General Permit for Storm Water Discharges Associated with Construction Activity (adopted by the SWRCB on September 2, 2009, and effective on July 1, 2010). This order was amended by 2010-0014-DWQ, which became effective on February 14, 2011, and 2012-0006-DWQ, which became effective on July 17, 2012. The existing permit expired in 2014 and has been administratively extended until the SWRCB reissues the General Permit and the new permit is effective.

area of one or more acres are required to either obtain individual NPDES permits for storm water discharges or to be covered by the Construction General Permit.

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

#### *Construction-related Water Quality Impacts*

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

The proposed Project would not involve construction activities on more than 1.0 acre (the site is approximately 0.6 acre) and therefore would not be required to comply with requirements and water quality standards set forth in the current NPDES permit regulations (i.e., processing through the SWRCB is not required). However, it would comply with the campus' MS4 permit, which requires the contractor to prepare a Storm Water Pollution Prevention Plan (SWPPP), which is required by LRDP Amendment (2017) Final SEIR PP 4.7-1. The SWPPP incorporates BMPs for reducing or eliminating construction-related pollutants in runoff from the site. The MS4 permit also requires incorporation of Low Impact Development (LID) standards for post-construction design, as further discussed under Operational Water Quality Impacts, below. The SWPPP would include both source control and treatment control BMPs to reduce water quality impacts. The BMPs that are most often used during construction and would be implemented for the proposed Project include watering exposed soils; covering stockpiles of soil; installing sandbags to minimize off-site runoff; and providing stabilized driveways at construction entrances and exits. Compliance with these requirements would reduce short-term construction related water quality impacts to a less than significant level.

#### *Operational Water Quality Impacts*

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

The proposed Project would involve development of a new structure for faculty housing with planter boxes and landscaped areas throughout the Project site; the impervious area with the proposed Project would increase approximately 7 percent compared to when the Project site was

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<sup>19</sup> On February 5, 2013, the Phase II Small MS4 General Permit was adopted and became effective on July 1, 2013 (WQ Order No. 2013-0001-DWQ). This was amended by the Executive Director of the SWRCB on September 2, 2015, June 20, 2016, and January 24, 2018, and amended by the SWRCB on December 19, 2017.



previously developed with the Church auditorium (Psomas 2019). The proposed Project would comply with applicable requirements at the time of construction, as per LRDP Amendment (2017) Final SEIR PP 4.7-1 and MM 4.7-1, to ensure that discharges of post-construction pollutants remain less than significant. This includes the implementation of structural and non-structural BMPs. Storm water management BMPs in compliance with the Phase II MS4 General Permit, including LID requirements, would be designed and constructed within the Project site to treat storm water, remove pollutants, and control the discharge flow rate. The Phase II Small MS4 General Permit prioritizes BMP types as follows: infiltration, storage and reuse, and biofiltration. Based on the results of the percolation test conducted during preparation of the Geotechnical Investigation, a storm water infiltration system is not recommended (Geocon 2019). Pursuant to Final SEIR PP 4.7-5, a site-specific hydrologic evaluation would be conducted for the proposed Project and would include identification of Project-specific BMPs (structural and non-structural), including the BMPs listed in Final SEIR MM 4.7-1. However, the conceptual utility plan for the proposed Project anticipates installation of a cistern in the southwestern corner of the Project site, which would capture and hold runoff and prevent pollutants from entering the storm drain system. The storm water would then be used for on-site irrigation. In addition to structural BMPs, non-structural BMPs at the Project site related to maintenance and use of parking areas; education and training; landscaping; and monitoring and maintenance of structural BMPs would be implemented.

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

#### Groundwater

As previously discussed, groundwater beneath the Project site was encountered at depths of 52.3 feet bgs and 53.0 feet bgs, respectively (Geocon 2019). Considering the depth to groundwater encountered, the Geotechnical Investigation concludes that groundwater is not anticipated to be encountered during excavation activities, which are expected to a depth of approximately 24 feet bgs. Therefore, the proposed Project would not degrade groundwater quality.

#### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

#### **Level of Significance**

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

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

## Discussion

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

Development of the proposed Project would increase the amount of impervious surface coverage on the property as compared to existing conditions and compared to when the site was developed with the previous Church auditorium. Although urban development on the Project site would reduce the pervious areas available for natural recharge, the area covered by the proposed development is relatively small from a regional recharge perspective. Additionally, the Project site does not accept run on, only direct precipitation, providing little overall opportunity for recharge under existing conditions. Furthermore, the Project site is not a designated groundwater recharge area for the Santa Monica Basin. As such, implementation of the proposed Project would not substantially interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

## Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

## Level of Significance

The proposed Project would have a less than significant impact related to a substantial decrease of groundwater supplies or interference with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

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

## **Discussion**

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

### **Erosion and Siltation**

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

In the long term, because the Project site is primarily exposed soil under existing conditions, the proposed Project would decrease the amount of pervious surface, resulting in less surface area exposed to potential erosion. Soil flowing off site (by wind or water erosion) would be reduced by development and landscaped areas. Areas of exposed soils would be minimal following construction of the proposed Project, and potential erosion impacts would be less than significant during operation.

### **Site Drainage and Storm Water Runoff**

As discussed above, development of the proposed Project would slightly increase the amount of impervious surface at the Project site, compared to when the site was developed with the previous Church auditorium (an increase from 83 percent to 90 percent) (Psomas 2019). By increasing the amount of impervious surfaces on the site, more surface runoff would be generated and the rate and volume of runoff would increase. To support preparation of the DPP, a Preliminary Hydrology Summary was prepared to determine existing and post-development runoff conditions under the 10-year and 50-year design storm, and the 85th percentile design storm (Psomas 2019). In the proposed condition, the Project site has been designed to generally drain in the same direction as the existing undeveloped condition (to the southwest). The conceptual utility plan anticipates installation of a cistern in the southwestern corner of the Project site, which would capture and hold runoff in compliance with applicable regulations. Pursuant to LRDP Amendment (2017) Final SEIR PP 4.7-5, a site-specific hydrologic evaluation would be conducted during design of the proposed Project to confirm the volume and flow rate from the Project site and Project-specific BMPs to reduce the runoff rate and volume to appropriate levels.

There is a City of Los Angeles 42-inch storm drain line in Hilgard Avenue. As with the previously developed condition, the Project site would discharge to the 42-inch storm drain in Hilgard Avenue. With adherence to applicable storm water management regulations and incorporation of Final SEIR PP 4.7-5, and installation of a cistern to capture storm water runoff from the Project site, the proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, and would not exceed the capacity of the existing storm drain system.

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

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

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

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

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

### **Discussion**

Based on review of the City of Los Angeles General Plan Safety Element, the Project site is not within a flood hazard zone (refer to Exhibit F of the Safety Element) or an inundation or tsunami hazard area (refer to Exhibit G of the Safety Element) (City of Los Angeles 1996). Further, the Project site is not near a body of water and would not be subject to a seiche. Therefore, the proposed Project would not risk release of pollutants due to Project inundation.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

The proposed Project would have no impact related to the release of pollutants due to Project inundation.

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

The Project site is located within the jurisdiction of the Los Angeles RWQCB. The RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's

groundwater and surface water. The RWQCB has developed a Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which was most recently updated in September 2014 (LAWRQCB 2014). The Basin Plan establishes water quality standards for the ground and surface waters of the region, and describes the actions by the RWQCB and others that are necessary to achieve and maintain the water quality standards. Permits are issued under several programs and authorities. The terms and conditions of these discharge permits are enforced through a variety of technical, administrative, and legal means. The RWQCB ensures compliance with the Basin Plan through its issuance of NPDES Permits, issuance of WDRs, and Water Quality Certifications pursuant to Section 401 of the Clean Water Act (CWA). As required by LRDP Amendment (2017) Final SEIR PP 4.7-1 and MM 4.7-1, the proposed Project would comply with the latest NPDES General Permit, and a SWPPP that incorporates BMPs for reducing or eliminating construction-related pollutants generated at the Project site would be prepared and implemented. As such, the proposed Project would not conflict with the Basin Plan, and no impact would occur.

The 2014 Sustainable Groundwater Management Act (SGMA) requires local public agencies and Groundwater Sustainability Agencies (GSAs) in “high”- and “medium”-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability. The California Department of Water Resources (DWR) currently categorizes the Santa Monica Basin as a “medium-priority” basin; therefore, the Santa Monica Basin is subject to the requirements of the SGMA (DWR 2019). On April 19, 2017, the cities of Santa Monica, Los Angeles (through its Department of Water and Power), Beverly Hills, Culver, and the County of Los Angeles entered a Memorandum of Understanding (MOU) for the formation of the Santa Monica Basin GSA to implement a single GSP. However, at the time this IS was drafted, neither a GSP nor an Alternative to a GSP was prepared or adopted for the Santa Monica Basin.

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

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

#### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

#### ***Level of Significance***

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

## 11. LAND USE AND PLANNING

Relevant elements of the proposed Project related to land use include the development of the Project site with near-campus housing for existing and future UCLA faculty. The proposed Project consists of a new, up to 120,000 gsf, residential building with up to 100 units (200 residents), and a maximum of 50,000 gsf of parking space to accommodate two levels of subterranean parking.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs are considered part of the proposed Project and are assumed in the analysis presented in this section. A change in the text from the LRDP Amendment (2017) Final SEIR is signified by ~~strikeout~~ (strikeout) where text has been removed; this change has been made so the stated requirement better applies to the proposed Project, which is off campus.

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

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

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

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

### Project Impact Analysis

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

### **Discussion**

As shown on the aerial photograph provided in Figure 3, the community surrounding the UCLA campus, including the Project site, is fully developed and established. The proposed Project is an infill development (consistent with LRDP Amendment [2017] Final SEIR), which would develop the Project site, which was previously developed with a Church auditorium, with a residential building for UCLA faculty. The proposed residential use is consistent with existing residential development to the south, east, and west of the Project site. The proposed Project would not divide an established community and no impact would occur.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.



## Level of Significance

The proposed Project would not physically divide an established community and no impact would result.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

### Regional Planning Programs

With respect to regional planning, SCAG is the MPO for Los Angeles, Riverside, Orange, San Bernardino, Ventura, and Imperial Counties. The federal government mandates SCAG, as the designated MPO, to prepare plans for growth management, transportation, air quality, and hazardous waste management. In addition, SCAG reviews EIRs for projects of regional significance for consistency with its regional plans (SCAG 2019). The policies and strategies of SCAG's regional planning programs, including the 2016–2040 RTP/SCS and Regional Housing Needs Assessment (RHNA) are not applicable to the Project because the proposed Project is not of Statewide, Regional, or Areawide Significance based on the established criteria in Section 15206 of the State CEQA Guidelines, which is applied by SCAG to determine regional significance.

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

### University of California, Los Angeles

The UCLA 2002 LRDP, as amended through 2017, guides the physical development of the UCLA campus to serve its teaching, research, and public service mission. The Project site is not located on campus and therefore is not considered in relation to the remaining building square footage allocation for campus uses or parking and trip generation limits identified in the LRDP. The proposed Project would not conflict with the provisions of the LRDP. The proposed Project would help UCLA provide additional faculty housing (up to 100 apartment units) proximate to campus to address current and anticipated demands. The proposed Project would also support recruitment and retention of top-quality faculty for academic programs by providing quality, below-market-priced housing for faculty and their families in close proximity to campus. The proposed Project would not add new faculty positions; rather it would accommodate faculty that is accounted for in the campus' population projections, as identified in Table 4.11-2, UCLA On-Campus Population 2014–2025 (3-Quarter Regular Session Average Weekday), of the LRDP Amendment (2017) Final SEIR.

## City of Los Angeles

As previously identified in Section V.1, Aesthetics, of this IS, with respect to City of Los Angeles land use plans, policies, and regulations, UCLA is part of the University of California, a constitutionally created entity of the State of California. As a constitutional entity, the University of California is not subject to municipal regulations, including general plans, specific plans and zoning regulations. Westwood and other surrounding communities are part of the City of Los Angeles, and although this jurisdictional separation provides no formal mechanism for joint planning or the exchange of ideas, UCLA may consider (for coordination purposes) aspects of local plans and policies for the communities surrounding the campus but is not bound by those plans and policies in its planning efforts. The campus seeks to maintain an ongoing exchange of ideas and information and to pursue mutually acceptable solutions for issues that confront both the campus and the community. To foster this process, UCLA participates in, and communicates with, City and community organizations and sponsors various meetings and briefings to keep local organizations, associations, and elected representatives apprised of ongoing planning efforts. Notably, the DPP Architect and UCLA leadership held community information meetings regarding the proposed Project. Additionally, during the development of the DPP, UCLA established an advisory committee made up of community members to obtain input in establishing design principles for the proposed Project. Following is a discussion of the proposed Project's relationship to local plans and regulations.

The City of Los Angeles General Plan consists of the Framework Element, a Land Use Element, and ten citywide elements. The *City of Los Angeles General Plan Framework*, adopted in December 1996 (re-adopted in August 2001), provides general guidance on land use issues for the entire City (City of Los Angeles 2001). For purposes of developing, maintaining, and implementing the land use portion of the General Plan, the City has been divided between 35 community plan areas, which collectively comprise the Land Use Element of the General Plan. The community plans are intended to implement the policies of the General Plan Framework. Although the provisions of the community plans are not applicable to the proposed Project, the Project site is within the *Westwood Community Plan* area (City of Los Angeles 1999). Most of the multiple family residential development in the Westwood Community is located within several Specific Plans. The Project site is within the East Westwood Village Area of the *Westwood Community Multi-Family Specific Plan* (City of Los Angeles 1988a). The *Westwood Community Plan* acknowledges that areas within one mile of the UCLA campus where rental housing is available for students and faculty include East Westwood Village, North Westwood Village, and the area south of Wilshire Boulevard (City of Los Angeles 1999). While the *Westwood Community Plan* anticipates this housing would be provided by the private sector, the provision of faculty housing by UCLA does not conflict with this anticipated type of land use.

Based on review of the *General Plan Land Use Map: Westwood Community Plan Area*, the Project site and adjacent parcels have a Medium Residential land use designation (City of Los Angeles 2010). The Medium Residential land use designation for the Project site and adjacent parcels includes a density range of 29 to 55 dwelling units per acre. While the proposed Project (with up to 100 units) would exceed the density range, as demonstrated through the analysis presented in this IS, with implementation of the identified LRDP Amendment (2017) Final SEIR PPs and MMs, and Project-specific MMs, the proposed Project would not result in any significant environmental impact as a result of the density of the proposed development.

The Project site is zoned [Q]R3-1-O, which is a Multiple Dwelling Zone (R3), within Height District 1 (City of Los Angeles 2019a). The R3 Zone permits various residential uses including, but not limited to, multiple dwellings and apartment houses. The proposed Project involves the development of a 100-unit apartment building for faculty housing, and would not conflict with the allowed uses in the R3 zone.

Among other purposes, the *Westwood Community Multi-Family Specific Plan* is intended to assure that development of the area is in accordance with the provisions of the *Westwood Community Plan*, and to adequately buffer single-family residential uses from adjacent multiple-family residential development to the greatest extent feasible. Other purposes of the *Westwood Community Multi-Family Specific Plan* address aesthetics and aesthetic qualities, as addressed in Section V.I, Aesthetics, of this IS. The Project site is not located adjacent to any single-family residential uses. Rather, there are multi-family residential uses to the west, south, and east, and the Church to the north. The *Westwood Community Multi-Family Specific Plan* establishes development standards for development within the Specific Plan area. The regulations of the *Westwood Community Multi-Family Specific Plan* are in addition to those set forth in the planning and zoning regulations of the City's Municipal Code. However, wherever the *Westwood Community Multi-Family Specific Plan* regulations differ from regulations contained in the City's Municipal Code, the Specific Plan prevails and supersedes the applicable provisions of that code (City of Los Angeles 1988a). Section V.I, Aesthetics, of this IS addresses the proposed Project's consistency with land use regulations, design standards, and landscape standards. As identified, the proposed Project has incorporated various design elements and building restrictions that serve to meet the intent of these regulations and to ensure the visual character of the proposed Project is compatible with the character of the adjacent neighborhoods.

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

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

#### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

#### ***Level of Significance***

The proposed Project would result in no impact related to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed Project.

## 12. MINERAL RESOURCES

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

### Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### **Discussion**

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

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

The proposed Project would have no impact related to (1) the availability of a known mineral resource that would be of value to the residents of the State and region and (2) the availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

## 13. NOISE

Relevant elements of the proposed Project related to noise and vibration include the use of diesel-powered equipment during construction and the operational noise that may be generated by mechanical equipment, including but not limited to a cooling tower and an emergency generator; by outdoor social or recreational activities; and by associated vehicle traffic.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs are considered part of the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment (2017) Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project, which is off campus, and to ensure implementation of the mitigation.

- PP 4.9-1** The campus shall continue to evaluate ambient noise conditions when placing new ~~student~~ housing near regular sources of noise such as roadways, ~~the on-campus helistop~~ and stationary equipment, and design the new buildings to ensure that interior noise levels would be less than 45 dBA CNEL.
- PP 4.9-6(a)** The campus shall continue to shield all new stationary sources of noise that would be located in close proximity to noise-sensitive buildings and uses.
- PP 4.9-7(a)** ~~To the extent feasible,~~ Construction activities shall be limited to 7:00 AM to 9:00 PM Monday through Friday, 8:00 AM to 6:00 PM on Saturday, and no construction on Sunday and national holidays, as appropriate, in order to minimize disruption to area residences surrounding the ~~campus and to on-campus uses~~ **Project site** that are sensitive to noise.
- PP 4.9-7(b)** The campus shall continue to require by contract specifications that construction equipment be required to be muffled or otherwise shielded. Contracts shall specify that engine-driven equipment be fitted with appropriate noise mufflers.
- PP 4.9-7(c)** The campus shall continue to require that stationary construction equipment material and vehicle staging be placed to direct noise away from sensitive receptors.
- PP 4.9-8** The campus shall continue to conduct meetings, as needed, with off-campus constituents that are affected by ~~campus~~ construction to provide advance notice of construction activities and ensure that the mutual needs of the particular construction project and of those impacted by construction noise are met, ~~to the extent feasible.~~
- MM 4.9-2** The campus shall require by contract specifications that, ~~to the extent feasible,~~ large bulldozers, large heavy trucks, and other similar equipment not be used ~~within 43 feet of occupied residence halls, within 34 feet of non-residential/non-sensitive buildings, and within 135 feet of buildings that house sensitive instrumentation or similar vibration-sensitive equipment or activities.~~ The work shall be done with medium-sized equipment or smaller ~~within these prescribed distances to the extent practicable.~~
- MM 4.9-7** A solid noise barrier that would break the line of sight between the construction site and a sensitive use area would reduce construction noise by at least 5 dBA. Therefore, when detailed construction plans are complete, the campus shall review the locations of sensitive receptor areas in relation to the construction site. If it is determined that a 12-foot-high barrier would break the line of sight between an 11-foot-high noise source and adjacent sensitive use areas, a temporary barrier shall be erected ~~to the extent practicable.~~ The barrier shall be solid from the ground to the top with no openings, and shall have a weight of at least 3 pounds per square foot, such as plywood that is ½-inch thick.

### **Fundamentals of Sound and Environmental Noise**

Sound is a vibratory disturbance that is created by a moving or vibrating source and is capable of being detected by the ear. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. In its most basic form, a continuous sound can be described by its frequency or wavelength (pitch) and its amplitude (loudness). Frequency is expressed in cycles per second, or hertz. Frequencies are

heard as the pitch or tone of sound. High-pitched sounds produce high frequencies; low-pitched sounds produce low frequencies. Sound pressure levels are described in units called the decibel (dB).

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

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

Human perception of noise has no simple correlation with acoustical energy. The perception of noise is not linear in terms of dBA or in terms of acoustical energy. Two noise sources do not sound “twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive changes of a 3 dBA increase or decrease; that a change of 5 dBA is readily perceptible; and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (Caltrans 1998). Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider the fact that the effect noise has upon people is largely dependent upon the total acoustical energy content of the noise and the time of day when the noise occurs. The rating scales that are applicable to this analysis are as follows:

- **$L_{eq}$** , the equivalent energy noise level, is the average acoustic energy content of noise for a stated time period. Thus, the  $L_{eq}$  of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. This rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- **CNEL**, the Community Noise Equivalent Level, is a 24-hour average  $L_{eq}$  with a 10 dBA “weighting” added to the hours between 10:00 PM and 7:00 AM and an additional 5 dBA weighting added to hours between 7:00 PM and 10:00 PM to account for noise sensitivity in the nighttime and evening, respectively. The logarithmic effect of these additions is that a steady noise source over a 24-hour period would result in a CNEL measurement approximately 7 dBA higher than the  $L_{eq}$  over the same period. This is generally not the case with traffic noise, as traffic volumes may vary considerably depending on the hour. For typical urban and suburban traffic, it has been found that the average noise level for the peak hour is numerically equal to the CNEL; therefore, for purposes of this analysis, the CNEL and peak hour traffic  $L_{eq}$  are assumed to be equal. CNEL is also used to describe aircraft noise.
- **$L_{min}$**  is the minimum instantaneous noise level experienced during a given period of time.
- **$L_{max}$**  is the maximum instantaneous noise level experienced during a given period of time.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. Prolonged noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated natural settings that can provide noise levels as low as 20 dBA and quiet suburban residential streets that can provide noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of



moderate level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA CNEL) and commercial locations (typically 60 dBA CNEL). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA CNEL) or dense urban or industrial areas (65 to 80 dBA CNEL).

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

### **Fundamentals of Environmental Vibration**

Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as peak particle velocity in inches per second (ppv in/sec) and, in some studies, as vibration decibels (VdB).

Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. Guideline criteria for vibration annoyance established by the California Department of Transportation (Caltrans) are shown in Table 8 (Caltrans 2013).

**TABLE 8**  
**VIBRATION ANNOYANCE POTENTIAL CRITERIA**

<b>Average Human Response</b>	<b>ppv (in/sec)</b>
Severe	0.4
Strongly perceptible	0.1
Distinctly perceptible	0.04
Barely perceptible	0.01
ppv: peak particle velocity; in/sec: inch(es) per second Source: Caltrans 2013.	

### **Noise-Sensitive Receptors**

Noise-sensitive receptors are generally considered to be those people engaged in activities or utilizing land uses that may be subject to the stress of significant interference from noise. Activities usually associated with sensitive receptors include, but are not limited to, talking, reading, and sleeping. The nearest sensitive receptors are the residences in the building adjacent to and east of the Project site; the residences south of the Project site across Lindbrook Drive; and the Church to the north of the Project site.

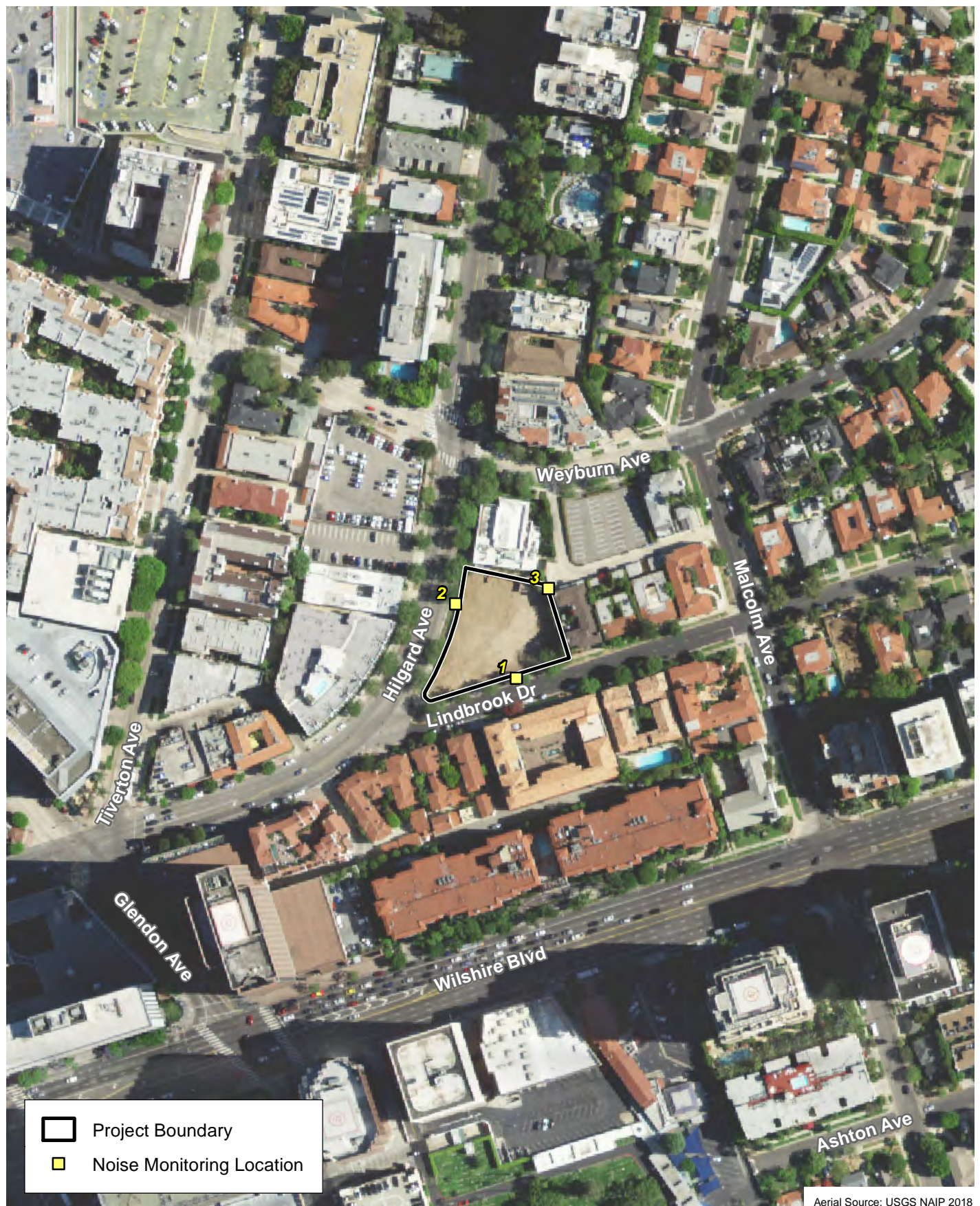
### **Existing Ambient Daytime Noise Levels**

Existing ambient daytime noise levels were measured at three locations adjacent to the Project site in May 17, 2019 between 11:00 AM and 1:00 PM to identify representative noise levels during the regular academic session. The noise measurement locations are identified in Table 9 and Figure 17. The noise levels were measured using a Casella 633C sound level meter, which satisfies the American National Standards Institute for general environmental noise measurement instrumentation. The sound level meter and microphone were mounted on a tripod five feet above the ground and equipped with a windscreen during all measurements. The sound level meter was programmed in “slow” mode to record noise levels in “A” weighted form. Meteorological conditions during the measurement periods were favorable and representative of the typical conditions, with clear skies, daytime temperatures of approximately 65 to 70°F, and variable winds.

The average, maximum, and minimum noise levels and sources of noise measured at each location are identified in Table 9. These ambient noise levels are characteristic of an urban residential environment. During the survey, average daytime noise level at the Project site boundary facing Lindbrook Drive was approximately 62 dBA average noise level ( $L_{eq}$ ), and the average daytime noise level at the Project site boundary facing Hilgard Avenue was approximately 63 dBA  $L_{eq}$ . At the northeast corner of the Project site, near the existing residential building east of the Project site the average daytime noise level was approximately 56 dBA  $L_{eq}$ . It was observed during the site visit that the dominant sources of noise in the area were traffic on the adjacent streets. In typical urban and suburban settings, the CNEL is approximately 2 dBA greater than the average daytime noise level. The existing CNEL at the Lindbrook Drive side of the Project site is estimated at 64 dBA, and the CNEL at the Hilgard Avenue side of the Project site is estimated at 65 dBA CNEL.

**TABLE 9  
EXISTING AMBIENT NOISE LEVELS**

Site Location ID	Location Description	Time Started/ Duration <sup>a</sup>	Major Noise Sources	Noise Level (dBA)			
				$L_{eq}$	$L_{max}$	$L_{min}$	CNEL <sup>b</sup>
1	Lindbrook Dr. Approx. 175 ft. east of Hilgard Ave. Approx. 22 ft from street centerline. <sup>a</sup>	11:55 AM, 18 minutes	Traffic on Lindbrook Dr. $L_{max}$ from trash truck operations	62	76	52	64
2	Hilgard Ave. Approx. 175 ft. north of Lindbrook Dr. Approx. 33 ft from street centerline. <sup>a</sup>	12:19 PM, 17 minutes	Traffic on Hilgard Ave. Occasional medium trucks. One light plane.	63	71	51	65
3	Northeast corner of site. Adjacent to NW corner of existing residential building. Approx. 130 ft. from Lindbrook Dr., 170 ft. from Hilgard Ave., and 25 ft. above site level.	12:41 PM, 17 minutes	Traffic on Hilgard Ave. and Lindbrook Dr. Some strong wind gusts.	56	64	51	58
dBA: A-weighted decibels; $L_{eq}$ : average noise level; $L_{max}$ : maximum noise level; $L_{min}$ : minimum noise level <sup>a</sup> All noise measurements were taken on May 17, 2019. <sup>b</sup> CNEL calculated from measured $L_{eq}$							



## Noise Monitoring Locations

*Hilgard Faculty Housing Project*



200 100 0 200  
Feet

Figure 17





## **Project Impact Analysis**

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

## **Discussion**

### **Construction**

During construction, nearby noise-sensitive receptors would be exposed to occasional high noise levels associated with the operation of heavy equipment, such as loaders, dozers, and excavators, primarily during the subterranean excavation phase. Section 41.40 of the *Los Angeles Municipal Code* prohibits construction activities that generate noise between the hours of 9:00 PM and 7:00 AM (during the hours when people normally sleep and during the early morning and evening when people are typically within their home and more sensitive to noise effects) of the following day (Monday through Friday), and before 8:00 AM or after 6:00 PM on any Saturday or national holiday. Construction activities are prohibited on Sundays. LRDP Amendment (2017) LRDP Amendment Final SEIR PP 4.9-7(a) reflects these hourly restrictions. Further, Section 112.05 of the *Los Angeles Municipal Code* limits construction equipment noise between the hours of 7:00 AM and 10:00 PM in any residential zone of the City or within 500 feet thereof to a 75 dBA  $L_{max}$  at a distance of 50 feet; however, construction noise levels are exempt from the 75 dBA  $L_{max}$  threshold if all technically feasible noise attenuation measures are implemented. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise-reduction devices or techniques during equipment operation.

In accordance with LRDP Amendment (2017) Final SEIR MM 4.9-7, which is incorporated into the proposed Project, solid noise barriers would be built on the north, east, and south Project site boundaries to reduce noise levels to the Church and nearby residences. Construction equipment noise would not be constant because of the variations of power, cycles, and equipment location. For the purposes of this analysis, assuming the operation of a dozer and an excavator operating simultaneously at the center of the site, at approximately 75 feet from the residences to the east and 100 feet from the Church and the residences to the south, the combined typical average noise levels at the nearest noise-sensitive uses would range from 73 to 76 dBA  $L_{eq}$  during construction, as shown on Table 10. The data in Table 10 assume a noise reduction of 5 dBA for the noise barrier on the Project site boundaries. However, as the excavation proceeds below the initial grade, the noise reduction due to the barrier would increase and the noise levels at the sensitive receptors would decrease. It should be noted that the maximum construction equipment noise levels at a distance of 50 feet could be 85 dBA  $L_{max}$  or more.

**TABLE 10  
MAXIMUM CONSTRUCTION NOISE LEVELS**

	Maximum Noise Levels at 50 ft (dBA L <sub>max</sub> ) <sup>a</sup>	Duty Cycles	Noise reduction from barrier (dBA L <sub>eq</sub> )	Average Noise from Equipment at 75 ft (dBA L <sub>eq</sub> )	Average Noise from Equipment at 100 ft (dBA L <sub>eq</sub> )
Dozer	85	40%	5	73	70
Excavator	85	40%	5	73	70
<b>Combined</b>	<b>88</b>	<b>n/a</b>	<b>5</b>	<b>76</b>	<b>73</b>
ft: foot/feet; dBA: A-weighted decibel(s); L <sub>eq</sub> : equivalent energy noise level; L <sub>max</sub> : maximum instantaneous noise level;					
<sup>a</sup> Thalhemeier 2000					

The existing average ambient daytime noise levels at the facades of residences facing the Project site are 56 and 62 dBA L<sub>eq</sub> (Table 10). The noise level at the south Church facade ranges between approximately 56 and 63 dBA L<sub>eq</sub> depending on the distance from Hilgard Avenue. Without noise attenuation, average construction noise levels at the closest receptors could range up to 20 dBA above ambient noise levels and occasional maximum construction noise levels could be greater than 25 dBA compared to ambient noise levels. The loudest noise levels would occur during approximately two months of excavation. There would be a substantial temporary noise increase during this period related to on-site heavy equipment use. At the conclusion of excavation, the use of heavy equipment would be limited, and noise levels related to construction activity would be much reduced from those shown in Table 10.

Technically feasible noise attenuation would be provided with the Project's incorporation of LRDP Amendment (2017) Final SEIR PP 4.9-7(b), which requires the muffling or shielding of equipment; Final SEIR PP 4.9-7(c), which requires that stationary construction equipment material and vehicle staging be placed to direct noise away from sensitive receptors; and, Final SEIR MM 4.9-7, which requires the installation of noise barriers. To further reduce construction-related noise levels to the maximum extent practicable, additional Project-level MM Hilgard NSE-1, which includes technically feasible measures, would be incorporated into the proposed Project. MM Hilgard NSE-1 further expands on the Final SEIR requirements and requires: noisier construction equipment be fitted with enhanced mufflers (depending on the grade of muffler available, noise reductions could range from 10 to 40 dBA [FHWA 2019, Diesel Service and Supply 2019]); stationary noise-generating construction equipment, such as generators and compressors be located as far as practical from noise-sensitive receptors; the use of electrical power in lieu of internal combustion engines, where feasible; and, specifies the minimum height of required noise barriers (10 feet). It should be noted that the temporary noise barriers installed in accordance with LRDP Final SEIR MM 4.9-7 would be effective only where they break the line of sight between noise sources and receptors. Thus, when building construction proceeds above the first story, construction noise would be louder. Typical noise sources during the above ground building phase are hand power tools, hammering, intermittent use of a crane and forklifts for materials handling, and concrete delivery and pumping equipment.

Even with noise attenuation measures, construction activities would be heard at neighboring residences above the existing noise levels and would create temporary annoyance. The Project incorporates Final SEIR PP 4.9-8, which requires the campus to conduct regular meetings with off-campus constituents to provide notice of construction activities, and Final SEIR PP 4.9-7(a) (consistent with Section 41.40 of the *Los Angeles Municipal Code*) which prohibits construction activities to occur during recognized sleep hours for residents. With adherence to established construction hours, and incorporation of technically feasible mitigation described above, the

construction activities associated with the proposed Project would not conflict with established construction-related noise standards and would be less than significant.

With respect to construction vehicle noise impacts, it is anticipated that up to 15 truck trips per hour during the 60-day excavation phase would occur due to soil export from the Project site (assumes truck trips occurring over approximately 6 hours per day). This would be a small number of trips compared to the existing traffic along the construction traffic route established for the proposed Project, which includes Hilgard Avenue, Lindbrook Drive (west of Hilgard), Glendon Avenue, and Wilshire Boulevard (refer to the discussion of construction activities in Section II.5, Proposed Project Components, of this IS). The construction traffic route does not include construction traffic on Lindbrook Drive east of Hilgard Avenue. While any single truck passing may be audible, it is expected that the noise from Project-related construction truck traffic would be indistinguishable from normal traffic. A doubling of traffic volumes is required to increase average traffic noise levels by 3 dBA, a change which is barely discernable to human hearing. The quantitative increase in hourly noise level would be negligible at uses adjacent to the roadways along the construction traffic route and would be less than significant. No mitigation measures would be required for truck noise during construction.

### Operations

The primary potential operational project-generated noise sources that could impact nearby sensitive receptors include roof-mounted mechanical equipment, outdoor gathering areas, and vehicle operations. As discussed in the Project Description, Section II of this IS, the DPP includes program requirements and performance criteria for the proposed Project.

It is anticipated that roof-mounted cooling towers would be used to support the heat pumps used for cooling the Project residential units. The DPP requires the “Design Builder to ensure noise levels at roof top mechanical not to exceed LA City nighttime dba guidelines.” Section 112.02 of the City of Los Angeles Noise Ordinance states, “It shall be unlawful for any person, within any zone of the city to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property . . . to exceed the ambient noise level by more than five (5) decibels.” Additionally, LRDP Amendment (2017) Final SEIR PP 4.9-6(a) requires shielding of all new stationary sources of noise that would be located in close proximity to noise-sensitive building and uses. Based on the DPP requirement and adherence to PP 4.9-6(a), the noise increase from rooftop equipment would not result in a substantial permanent increase of ambient noise levels.

Based on the DPP, an amenity roof deck, which could accommodate small social gatherings, is proposed at the northwest corner of the building at the 6<sup>th</sup> floor north setback. At this location, the 6<sup>th</sup> and 7<sup>th</sup> floor building structure would be a barrier between the roof terrace and most of the adjacent residences on the east and south. There would be a potential line of sight to a few residences, however, the 75- to 100-foot distance would attenuate outdoor talking and similar noise to less than significant levels. There would be no balconies on the building exterior facades and therefore no sources of noise from balconies.

The proposed Project would include a diesel-engine emergency generator within a room on the first level of the parking garage at the southwest corner of the Project site. The generator would be test operated periodically. Most generator noise would be confined to the generator room. However, because the generator would exhaust to the outside, some generator noise may be audible during test operation. With the limited noise and infrequent periods of test operation, the impact would be less than significant.



Project-generated traffic would enter and exit from a driveway on Hilgard Avenue. The proposed Project would generate an estimated 259 daily trips (Crain 2020). The Project traffic impact study projects that 6 percent of the traffic would use Lindbrook Drive east of Hilgard Avenue and that the added traffic would be less than one-tenth of one percent of the existing peak hour traffic volumes. Approximately 50 percent of Project traffic is estimated to use Hilgard Avenue north of the Project site. The added traffic would be an estimated 2 to 4 percent of the existing traffic. As noted above, doubling of traffic volumes is required to increase average traffic noise levels by 3 dBA, a change which is barely discernable to human hearing. The change in traffic noise to residences adjacent to Lindbrook Drive and Hilgard Avenue would be negligible. On-site parking would be in two levels of subterranean garage. Therefore, parking and engine start noise would not be audible to nearby sensitive receptors.

### ***Additional Project-Level Mitigation Measures***

The following Project-specific mitigation measure is required to reduce construction-related noise levels at adjacent sensitive receptors. This measure expands on similar requirements in the LRDP Amendment (2017) Final SEIR MMs and PPs identified previously.

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

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

### ***Level of Significance after Mitigation***

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

Construction activities associated with large grading equipment; pile driving; and heavy, loaded trucks and similar equipment, could generate and expose users or residents of the adjacent buildings to excessive groundborne vibration levels.

Construction activities that could produce measurable vibration would be associated with the excavation of the Project site for two levels of subterranean parking that is anticipated to occur for a total period of two months. Vibration sources to be considered are the operation of excavation and grading equipment and the installation of soldier piles. The potential vibration impact associated with excavation and grading equipment would be reduced with implementation of LRDP Amendment (2017) Final SEIR MM 4.9-2, which requires the use of medium-sized or smaller equipment.

No pile driving is required for the proposed Project, which is one of the activities that generates higher vibration levels during construction. However, according to the Geotechnical Investigation included in Appendix D (Geocon 2019), one method of shoring for the subterranean excavation “would consist of steel soldier piles, placed in drilled holes and backfilled with concrete. The steel soldier piles may also be installed utilizing high frequency vibration.” The Geotechnical Investigation also notes, (1) as an alternative, piles may be vibrated into place; however, there is always a risk that excessive vibrations in sandy soils could induce settlements and distress to adjacent off-site improvements; (2) continuous observation of the drilling and pouring of the piles by the Geotechnical Engineer . . . is required; and (3) vibrations should be monitored and recorded with seismographs during pile installation to detect the magnitude of vibration and oscillation experienced by adjacent structures. If the vibrations exceed the acceptable range during installation, the shoring contractor should modify the installation procedure to reduce the values to within the acceptable range. Further, the Geotechnical Investigation recommends review of adjacent structures before and during construction for signs of distress or settlement, and that corrective action be taken to address any distress or settlement identified during construction. MM Hilgard GEO-1 presented in Section V.7, Geology and Soils, requires that the recommendations from the Project-specific Geotechnical Investigation be incorporated into the Project, including recommendations related to vibration during the installation of steel soldier piles for shoring. With incorporation of MM Hilgard GEO-1, potential vibration impacts during construction of the subterranean garage would be less than significant.

UCLA has not adopted thresholds for groundborne vibration. This analysis uses the Caltrans vibration impact criteria for human annoyance shown in Table 8. Heavy trucks would transport soil from the Project site during excavation and would require approximately 2,313 truck round trips over a period of two months, or approximately 90 round trips per day. The access routes for haul trucks and most construction vehicles would include Hilgard Avenue south of the Project site, Lindbrook Drive west of Hilgard Avenue, Glendon Avenue, Westwood Boulevard, and Wilshire Boulevard. These are all paved, smooth roads and, as previously noted, if a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. Haul trucks typically generate groundborne vibration velocity levels of 0.036 ppv (in/sec) at 50 feet; this level of vibration may

be perceptible but would not be a strong or annoying vibration (see Table 8). The proposed Project would not expose occupants of buildings adjacent to haul truck routes to excessive groundborne vibration levels, and this impact would be less than significant. No additional mitigation would be required.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

With implementation of LRDP Amendment (2017) Final SEIR MMs and MM Hilgard GEO-1, the proposed Project would have a less than significant impact related to generation of excessive groundborne vibration or groundborne noise levels.

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

### ***Discussion***

The Project site is neither within an airport land use plan nor within two miles of a public airport or public use airport; therefore, no impact related to noise from public airport operations would occur. The proposed Project is located approximately 0.4 mile southeast of the Ronald Regan UCLA Medical Center (RRUCLAMC), which operates a helistop (with two helipads) under a Caltrans Aeronautics Heliport Permit. The helistop is located on top of the ten-story facility and receives a very limited number of flights, with emergency helicopter operations occurring approximately twice per day. Implementation of the proposed Project would not increase the frequency of helicopter operations. The Project site is located outside the 65-dBA helicopter noise level contour that defines the area for aircraft noise impacts to noise-sensitive land uses. The helicopter noise levels experienced by proposed Project users and visitors would not be excessive. Therefore, the proposed Project would not expose people in the Project area to excessive noise levels from RRUCLAMC helistop operations. There would be a less than significant impact and no mitigation measures would be required.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

There would be no impact related to public use airports and a less than significant impact related to RRUCLAMC helistop operations.

## 14. POPULATION AND HOUSING

Relevant elements of the proposed Project related to population and housing include the development of the Project site with up to 100 apartment units for UCLA faculty. It is anticipated that there would be up to 200 residents at the proposed Project, with at least 100 of the residents being UCLA faculty members.

### Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### **Discussion**

Demand for UCLA faculty housing is consistently high and exceeds the available supply, with a wait list that typically includes about 100 faculty members every year, but can reach as high as 200 faculty members (Dundish 2019a). The proposed Project would provide 100 off-campus apartment units for UCLA faculty and is anticipated to have a population of approximately 200 individuals. No new infrastructure is proposed that would induce population growth.

The proposed Project would accommodate existing and future faculty anticipated and analyzed in the LRDP Amendment (2017) Final SEIR. Table 4.11-2, UCLA On-Campus Population 2014–2025 (3-Quarter Regular Session Average Weekday), of the Final SEIR estimates an increase of approximately 638 new academic positions between Fall 2016 and Fall 2020. With respect to the additional approximately 200 individuals that are expected to reside at the Project site, it is anticipated that many of these individuals, which include existing faculty and people associated with existing faculty, would already reside in the region.

The California Department of Finance (DOF) estimates that, as of January 2019, the City of Los Angeles had a population of approximately four million residents and a housing stock of approximately 1.5 million dwelling units (DOF 2019a, DOF 2019b). Even if it is conservatively assumed that the proposed Project would generate 200 new residents, an increase of 200 residents in the City of Angeles would represent a negligible increase in the existing population in the City, and would represent only approximately 0.04 percent of the City's projected increase in population when comparing the existing population to the projected 2040 population as presented in the jurisdictional growth forecasts in SCAG's 2016-2040 RTP/SCS (SCAG 2016) (an increase of approximately 569,321 residents).

The proposed Project would generate only two new staff positions (maintenance and custodial). It is anticipated these positions would be filled by the local labor pool and would also be within the campus population projections anticipated and analyzed in the LRDP Amendment (2017) Final SEIR. The LRDP Amendment (2017) Final SEIR (refer to Table 4.11-2) anticipated an increase of approximately 3,938 staff positions between fall 2017 and fall 2020.

Therefore, the proposed Project would not induce substantial unplanned population growth resulting in a less than significant impact.

**Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

**Level of Significance**

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

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

**Discussion**

The Project site is undeveloped and the proposed Project has no potential to displace a substantial number of existing people or housing.

**Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

**Level of Significance**

The proposed Project would have no impacts related to displacement of substantial numbers of existing people or housing that would necessitate the construction of replacement housing.

**15. PUBLIC SERVICES**

Relevant elements of the proposed Project related to public services include the development of the Project site with a seven-story mid-rise apartment building for existing and future UCLA faculty. There would up to 100 units and up to 200 residents, with at least 100 of the residents being UCLA faculty members. The proposed Project would not generate new faculty positions at UCLA, but would accommodate the increase in faculty anticipated and evaluated in the LRDP Amendment (2017) Final SEIR and, as discussed in Section V.14, Population and Housing, would have a negligible increase in the local population. The proposed Project would generate only two new staff positions (maintenance and custodial), which would be filled by the local labor pool.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs are considered part of the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment (2017) Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed. Changes have been made so the stated requirement better applies to the proposed Project.

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

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

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

### **Project Impact Analysis**

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

### ***Discussion***

The proposed Project, which would introduce new faculty housing and up to 200 residents and two staff members on a currently undeveloped site, would increase the demand for fire protection services compared to existing conditions at the Project site. The types of service calls are anticipated to be similar to those associated with existing residential uses in the Project area, including, but not limited to, structural fires and emergency medical and rescue services.

The Los Angeles Fire Department (LAFD) provides fire suppression and rescue operations for the UCLA campus. Fire Station No. 37 is located at 1090 Veteran Avenue, approximately 0.4 mile west of the Project site, and would have primary responsibility for a first alarm call to the Project site. In cases where there is a need for backup support, additional LAFD fire stations would provide the necessary assistance. Fire Station No. 37 includes a truck and two engines; Basic Life Support (BLS, for evening hours only) and Advanced Life Support (ALS, staffed 24 hours per day/7 days per week) ambulances; and a Fire Chief command car. The station is staffed daily by 14 fire personnel, including 1 paramedic and 1 member of the battalion command team (Roarty 2019). On a community-wide (Westwood Community) basis from January to August of 2019, Fire Station No. 37 had initial response times of 7 minutes for emergency medical services (EMS) calls; 6 minutes and 28 seconds for non-emergency medical services (EMS) calls; and 5 minutes and 55 seconds for critical advanced life support calls (LAFD 2019). In addition to LAFD paramedics, UCLA paramedics and ambulances from the RRUCLAMC respond to emergency calls both on and off campus (UCLA 2018).



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

Consistent with the campus' standard procedures, the Campus Fire Marshal would review and approve the proposed Project to ensure that (1) adequate fire flows are maintained; (2) an adequate number of fire hydrants is provided in the appropriate locations; and (3) circulation and design features allow adequate emergency vehicle access in compliance with the City of Los Angeles Municipal Code. The LADWP has confirmed that there is sufficient fire flow pressure in the Hilgard Avenue and Lindbrook Drive water lines to serve the proposed building (LADWP 2019b, 2019c). The Campus Fire Marshal also inspects buildings during and after construction, and buildings can only be occupied with the approval of the Fire Marshal. In addition, the proposed Project would comply with all regulations of the California Health and Safety Code (Sections 13000 et seq.) pertaining to fire protection systems, including provision of State-mandated smoke alarms, fire extinguishers, appropriate building access, and emergency response notification systems.

The proposed Project, which would involve the development of additional residential uses in an existing residential area, would not substantially increase the demand for fire protection services and would not require the need for new or physically altered fire protection facilities to accommodate the proposed Project and to maintain acceptable response times and fire flows. No physical environmental impacts related to the provision of fire protection services would result.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

The proposed Project would not require new or altered fire protection services and no physical impacts would occur.

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

### ***Discussion***

The proposed Project, which would introduce new faculty housing and up to 200 residents and two staff members on a currently undeveloped site, would increase the demand for police protection services compared to existing conditions at the Project site. The types of service calls are anticipated to be similar to those associated with existing residential uses in the Project area; the types of crimes typically associated with residential uses are "crimes against persons," such as assault and robberies.

According to Section 92600 of the *California Education Code*, the University of California Police Department (UCPD) has concurrent jurisdiction with the Los Angeles Police Department (LAPD) within a one-mile radius of University-owned property. The UCPD is often the first responder at properties around the campus and may take primary responsibility for events off campus. The UCPD are duly sworn police officers under 830.2(b) of the *California Penal Code* and its jurisdictional responsibilities are articulated in the section of the *California Education Code*. The UCPD station is located on campus, at the northwestern corner of the intersection of Charles E. Young Drive South and Westwood Plaza (601 Westwood Plaza), approximately 0.5-mile northwest of the Project site.

The UCPD has primary responsibility for police protection services on campus and at all off-campus properties, including the Project site, which is owned by UCLA. UCPD personnel are used in crime prevention, investigations, and administration. In addition, UCPD personnel are instrumental in providing training to staff and faculty on leadership in emergency situations, observation tactics, active shooter scenarios, and use of safety equipment and technology. All sworn officers are available on an on-call basis to respond in emergency situations. On a part-time basis, students are employed as Community Service Officers (CSOs) to provide escort services, equipment security services, and patrol assistance. UCPD has indicated that staffing levels are currently considered acceptable with approximately 64 sworn officers, 42 non-sworn personnel, and 130 students employed as CSOs (UCPD 2019). The campus evaluates police protection needs on an ongoing basis and considers the need to augment UCPD and CSO staffing levels as institutional priorities. Consistent with LRDP Amendment (2017) Final SEIR PP 4.11-2(a) and PP 4.11-2(b), which have been incorporated into the proposed Project, the campus would continue to assess police staffing levels as individual development projects are proposed.

The proposed Project, which would involve the development of additional residential uses in an existing residential area, would not substantially increase the demand for police protection services provided by the UCPD and/or LAPD, and would not require the need for new or physically altered police protection facilities to accommodate the proposed Project and to maintain acceptable response times. No physical environmental impacts related to the provision of police protection services would result.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

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

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

### **Discussion**

The proposed Project involves the development of housing for existing and future UCLA faculty. There would be no increase in student enrollment at UCLA and no increase in UCLA faculty

beyond that anticipated and evaluated in the LRDP Amendment (2017) Final SEIR. There would be two new staff positions that would be filled by the local labor pool. The proposed Project has the potential to result in elementary, middle, or high school student generation if faculty residents with a family are new to the area. However, it is expected that there would be a nominal number of school-aged children generated by the proposed Project (i.e., less than ten children) (Dundish 2019b). The proposed Project would not result in a need for the construction of new or altered school facilities. Therefore, no physical environmental impacts would result.

**Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

**Level of Significance**

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

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

**Discussion**

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

**Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

**Level of Significance**

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

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

**Discussion**

The proposed Project would introduce new faculty housing and up to 200 residents and two staff members on a currently undeveloped site. There are numerous library facilities provided by the UCLA Library on campus, including but not limited to: Arts Library, Biomedical Library, East Asian Library, Young Research Library, Law Library (with restricted access), Management Library, Music Library, Powell Library, Science and Engineering Library, Special Collections, and

Southern Regional Library. These facilities are accessible to UCLA students, staff, and faculty, and most of the libraries are also publicly accessible (UCLA 2019b). Therefore, Project residents and staff would have access to UCLA's library facilities. The proposed Project would not require new or expanded library facilities or other public facilities. Therefore, no physical environmental impacts would result.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

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

## **16. RECREATION**

Relevant elements of the proposed Project related to recreation include the development of the Project site with housing for existing and future UCLA faculty. There would be up to 100 units and up to 200 residents, with at least 100 of the residents being UCLA faculty members. The proposed Project would generate only two new staff positions (maintenance and custodial), which would be filled by the local labor pool. The proposed housing facility would provide an internal courtyard and amenity roof deck for use by residents and guests.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs are considered part of the proposed Project and are assumed in the analysis presented in this section.

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

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

### **Project Impact Analysis**

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## **Discussion**

The proposed Project would accommodate up to 200 new residents, at least 100 of these residents would be UCLA faculty members. The proposed Project would not generate new faculty positions at UCLA, rather it would accommodate the existing and future faculty anticipated and evaluated in the LRDP Amendment (2017) Final SEIR. As discussed in Section V.14, Population and Housing, the proposed Project would have a negligible increase in the local population.

Although Project residents and staff may utilize a variety of recreational facilities and programs offered by the campus (UCLA 2019c) and/or the City of Los Angeles, the majority of the campus population (students, faculty, and staff) utilize on-campus recreational facilities. These facilities would continue to be provided and maintained for faculty and staff and other Project residents, as required by LRDP Amendment (2017) Final SEIR PP 4.12-1(a). The UCLA Cultural Recreational Affairs Department continuously monitors the demand for recreational facilities on campus and adjusts operating hours and other program-operating procedures to ensure that the existing facilities are used as efficiently as possible. Continued review of the demand for facilities and adjustments to operating procedures and facility design (e.g., extending hours of operation) ensures that the on-campus demands are met to the extent feasible.

Additionally, PP 4.12-1(b) is incorporated into the proposed Project and requires the inclusion of open space areas at the Project site; this is accomplished primarily with the provision of a required internal courtyard and amenity roof deck.

Therefore, while the proposed Project would potentially increase the demand for park and recreational facilities, it would not represent a substantial demand such that it would result in a substantial deterioration of existing facilities, nor would it accelerate such deterioration, resulting in a less than significant impact. Additionally, the proposed Project would not result in a need for the construction of new or altered park or recreational facilities beyond the open space areas included as part of the Project (e.g., internal courtyard and amenity roof deck). The impacts resulting from on-site facilities have been evaluated throughout this IS and would be less than significant. No additional physical impacts would occur with implementation of the proposed Project.

## **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

## **Level of Significance**

The proposed Project would have a less than significant impact related to an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

The proposed Project would include an internal courtyard and amenity roof deck; the physical environmental impacts of these proposed Project components are addressed throughout this IS and impacts would be less than significant.

## **17. TRANSPORTATION**

Relevant elements of the proposed Project related to transportation include development of the Project site with housing for existing and future UCLA faculty. There would be up to 100 units and up to 200 residents, with at least 100 of the residents being UCLA faculty members. Two levels of subterranean parking would be provided with access from Hilgard Avenue. The Project site is

within walking distance to the UCLA campus (approximately 0.2 mile), and Project residents would have access to a full range of existing campus TDM programs. Additionally, bicycle storage facilities would be provided on site.

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

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs are considered part of the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment (2017) Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project, which is off campus.

- PP 4.13-1(d)** *The campus shall continue to implement a TDM program that meets or exceeds all trip reduction and AVR requirements of the SCAQMD. The TDM program may be subject to modification as new technologies are developed or alternate program elements are found to be more effective.*
- PP 4.13-2** *UCLA Capital Programs will assess construction schedules of major projects to determine the potential for overlapping construction activities to result in periods of heavy construction vehicle traffic on individual roadway segments, and adjust construction schedules, work hours, or access routes to ~~the extent feasible~~ to reduce construction-related traffic congestion.*
- PP 4.13-5** *~~To the extent feasible,~~ The campus shall maintain at least one unobstructed lane in both directions ~~on campus roadways~~. At any time only a single lane is available, ~~the campus~~ **the contractor** shall provide a temporary traffic signal, signal carriers (i.e., flagpersons), or other appropriate traffic controls to allow travel in both directions. If construction activities require the complete closure of a roadway segment, ~~the campus~~ **the contractor** shall provide appropriate signage indicating alternative routes.*
- PP 4.13-6** *For any construction-related closure of pedestrian routes, ~~the campus~~ **the contractor** shall provide appropriate signage indicating alternative route and provide curb cuts and street crossings to assure alternate routes are accessible.*
- PP 4.13-8** *To ensure adequate access for emergency vehicles when construction projects would result in temporary lane or roadway closures, UCLA shall consult with the UCPD, EH&S, and the LAFD to disclose temporary lane or roadway closures and alternative travel routes.*



## **Project Impact Analysis**

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## ***Discussion***

As previously discussed in Section V.11, Land Use and Planning, of this IS, UCLA is part of the University of California, a constitutionally created entity of the State of California, and is not subject to municipal regulations. Although there is no formal mechanism for joint planning or the exchange of ideas, UCLA may consider, for coordination purposes, aspects of local plans, ordinances, and policies for the communities surrounding the campus but is not bound by those plans and policies in its planning efforts. The following discussion analyzes the proposed Project's transportation impacts (vehicular and non-vehicular) taking into consideration UCLA and local transportation plans and policies, as appropriate. It should be noted that although the Project site is located in the *West Los Angeles Transportation Improvement and Mitigation Specific Plan* area, the proposed Project would not require payment of the established Transportation Impact Assessment (TIA) fee because the Project is associated with the UCLA operations (City of Los Angeles 2019b).

The *Transportation Impact Study for the Proposed UCLA Hilgard Faculty Housing Project, City of Los Angeles* (TIS) was prepared by Crain & Associates (Crain 2020) to evaluate potential transportation impacts resulting from operation of the proposed Project. Although UCLA is not required to follow the City of Los Angeles Department of Transportation (LADOT) Transportation Impact Study Guidelines (December 2016), the TIS prepared for the proposed Project incorporates these guidelines in the analysis, where applicable.

## **Intersection Impact Analysis**

The following traffic conditions have been analyzed for the proposed Project: Existing (2019) traffic volumes, Existing (2019) Plus Project traffic volumes, Future (2023) Without Project traffic volumes, and Future (2023) With Project traffic volumes. The analyses of future (2023) conditions includes cumulative traffic attributable to ambient growth and related projects within the Project study area. The TIS is included in Appendix F of this IS, and is summarized herein.

## ***Existing Conditions***

The Project site and surrounding uses in the Westwood Community Plan area are well-served by existing transportation facilities, which are described in detail in the TIS included in Appendix F. Regional access is provided via multiple freeways, including I-405 and I-10. These freeways both have interchanges with the surface street network in the greater Project vicinity. The nearest northbound and southbound onramps and offramps to the Project site include I-405 at Wilshire Boulevard, approximately 0.75 mile southwest of the Project site.

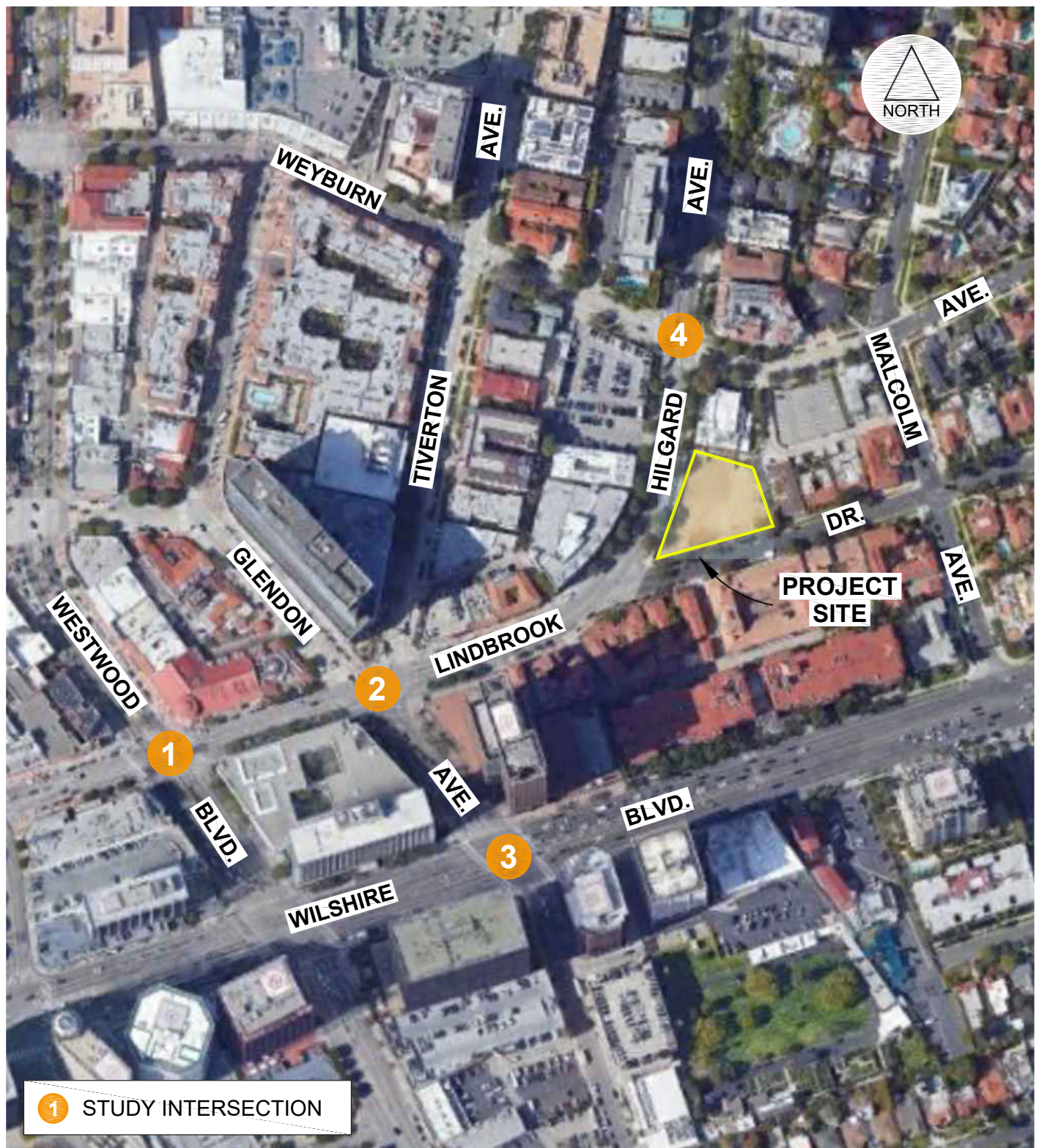
In the Project study area, Wilshire Boulevard is classified as a Boulevard II, per the City of Los Angeles Mobility Plan 2035. Westwood Boulevard is designated as a divided Avenue I in the

Project vicinity, while Hilgard Avenue, Glendon Avenue (between Lindbrook Drive and Wilshire Boulevard), and Lindbrook Drive (west of Hilgard Avenue) are classified as Avenue II roadways. Tiverton Avenue is classified as a Collector Street. Weyburn Avenue, Lindbrook Drive (east of Hilgard Avenue), and Glendon Avenue (north of Lindbrook Drive) are standard Local Streets. Hilgard Avenue and Lindbrook Drive are adjacent to the Project site and further described below.

- Hilgard Avenue is a north-south Avenue II that forms the western boundary of the Project site. Hilgard Avenue extends from its intersection with Sunset Boulevard, near the northeast corner of the UCLA campus, to where this roadway continues as Lindbrook Drive, at the southwest corner of the Project site. In the Project vicinity, this roadway is striped with one lane in each direction south of Le Conte Avenue and two lanes in each direction north of Le Conte Avenue. Lanes along Hilgard Avenue typically feature widths between 10 and 20 feet. Left- and (sometimes) right-turn channelization is provided at most intersections. Near the Project site, on-street parking is generally allowed along both sides of Hilgard Avenue.
- Lindbrook Drive is an east-west roadway that forms the southern boundary of the Project site. Near the Project site, this roadway is designated as an Avenue II west of Hilgard Avenue and a Local Street east of Hilgard Avenue. Lindbrook Drive extends continuously through the Westwood community from Veteran Avenue to Devon Avenue. Lindbrook Drive provides two westbound travel lanes and one eastbound travel lane west of Hilgard Avenue and one lane in each direction east of Hilgard Avenue. Near the Project site, lanes typically feature widths between 10 and 18 feet, and left-turn channelization is provided at most intersections west of Hilgard Avenue. Within the Project vicinity, on-street parking is generally available along both sides of Lindbrook Drive.

The traffic study area includes four signalized intersections, which are identified in Table 11 and depicted on Figure 18. Traffic volumes for existing conditions were obtained from manual traffic counts conducted on May 22, 2019 at the study area intersections. In accordance with the LADOT Transportation Impact Study Guidelines, intersection traffic counts were completed on a typical weekday during the morning and afternoon peak commute periods, which range from 7:00 AM to 10:00 AM and 3:00 PM to 6:00 PM, respectively. The traffic counts were conducted while UCLA was in session. The intersection counts include the enhanced bicycle and pedestrian count summary information. Peak-hour volumes were determined individually for each intersection based on the highest-volume four consecutive 15-minute periods for all vehicular movements. The Existing (2019) AM and PM peak-hour volumes at the study intersections are illustrated in Figures 3(a) and 3(b), respectively, of the TIS included in Appendix F.

The LADOT Transportation Impact Study Guidelines require the use of the Critical Movement Analysis (CMA) methodology to analyze signalized intersections for land use development projects; this methodology was applied for the Project TIS.



Source: Crain & Associates, 2019

## Project Site Vicinity and Study Intersections

Figure 18

*Hilgard Faculty Housing Project*

PSOMAS

**TABLE 11  
CRITICAL MOVEMENT ANALYSIS AND LEVEL OF SERVICE SUMMARY  
EXISTING (2019) AND FUTURE (2023) TRAFFIC CONDITIONS**

No.	Intersection	Peak Hour	Existing (2019) Conditions					
			Existing		With Project			
			V/C	LOS	V/C	LOS	Impact	Significant?
1	Westwood Boulevard & Lindbrook Drive	AM	0.259	A	0.259	A	0.000	No
		PM	0.425	A	0.425	A	0.000	No
2	Glendon Avenue & Lindbrook Drive	AM	0.469	A	0.475	A	0.006	No
		PM	0.477	A	0.480	A	0.003	No
3	Glendon Avenue & Wilshire Boulevard	AM	0.538	A	0.539	A	0.001	No
		PM	0.708	C	0.708	C	0.000	No
4	Hilgard Avenue & Weyburn Avenue	AM	0.289	A	0.292	A	0.003	No
		PM	0.489	A	0.498	A	0.009	No

No.	Intersection	Peak Hour	Future (2023) Conditions					
			Without Project		With Project			
			V/C	LOS	V/C	LOS	Impact	Significant?
1	Westwood Boulevard & Lindbrook Drive	AM	0.285	A	0.286	A	0.001	No
		PM	0.464	A	0.464	A	0.000	No
2	Glendon Avenue & Lindbrook Drive	AM	0.513	A	0.519	A	0.006	No
		PM	0.535	A	0.539	A	0.004	No
3	Glendon Avenue & Wilshire Boulevard	AM	0.570	A	0.571	A	0.001	No
		PM	0.750	C	0.750	C	0.000	No
4	Hilgard Avenue & Weyburn Avenue	AM	0.319	A	0.321	A	0.002	No
		PM	0.542	A	0.551	A	0.009	No

V/C: volume to capacity; LOS: level of service

Source: Crain 2020.

Using the CMA procedures, a determination can be made of the operating characteristics of an intersection in terms of the Level of Service (LOS)<sup>20</sup> for different levels of traffic volume and other variables, such as critical signal phases and the number and type of traffic lanes. The TIS provides a detailed discussion of the methodology for conducting the analysis of intersection conditions with and without the Project.

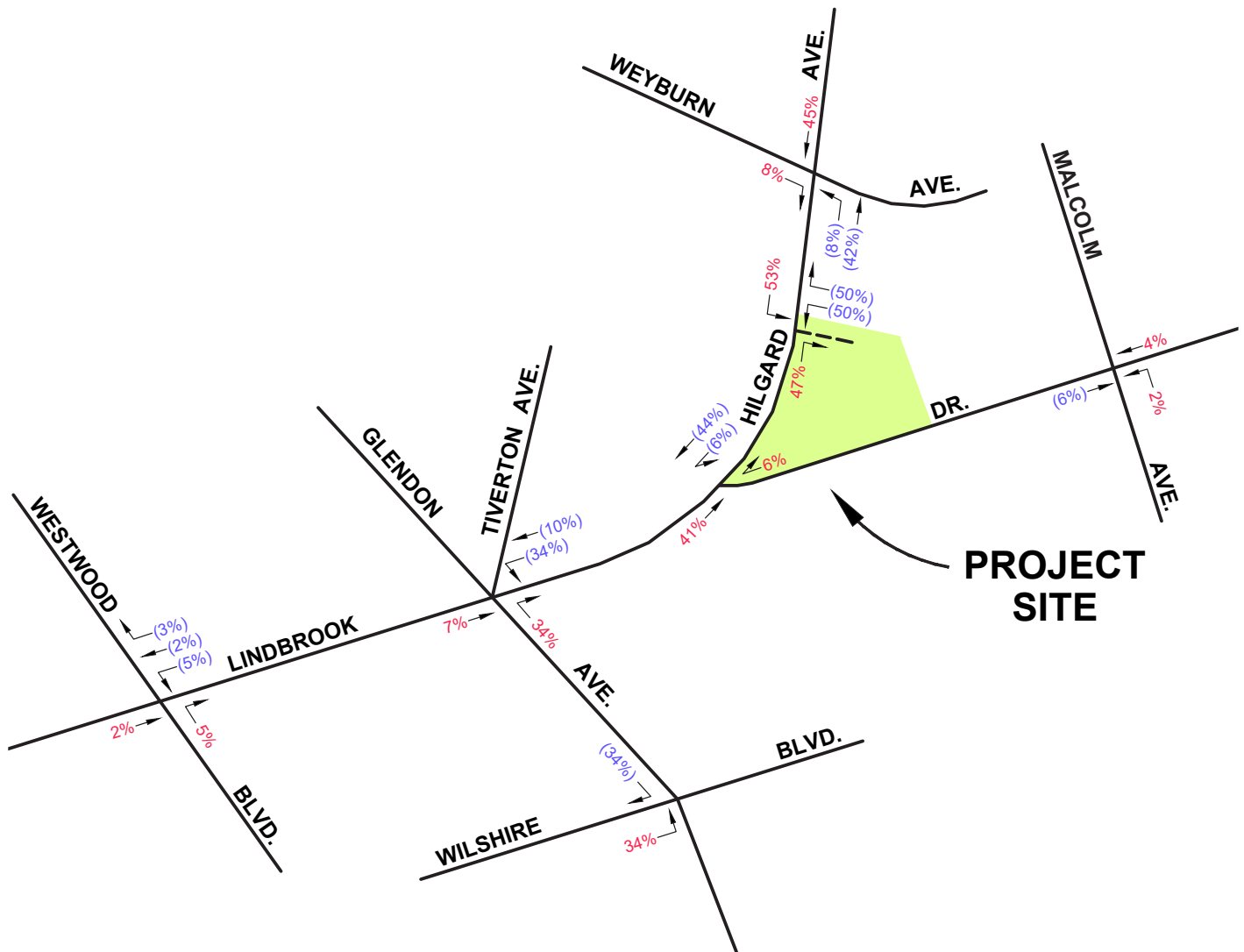
The analyses of Existing (2019) AM and PM peak-hour conditions at the study intersections are summarized in Table 11. As shown, three study intersections currently operate at LOS A during both peak hours. The intersection of Glendon Avenue and Wilshire Boulevard operates at LOS A during the AM peak hour and LOS C during the PM peak hour. CMA/LOS calculations were performed using the standard LADOT LOS Worksheet and the CMA/LOS calculation worksheets for the four study intersections are included in the TIA provided in Appendix F.

<sup>20</sup> The term "Level of Service" (LOS) describes the quality of traffic flow. As further described in the TIA included in Appendix F of this IS, LOS A through C are indicative of excellent-to-good traffic flow conditions. LOS D corresponds with fair conditions that may experience substantial delay during portions of the peak hours, but without excessive backups. LOS E represents poor conditions, with volumes at or near the capacity of the intersection and long lines of vehicles that may have to wait through several signal cycles. LOS F is characteristic of failure (i.e., the intersection is overloaded, vehicular movements may be restricted or prevented, and delays and queue lengths become increasingly longer).

### *Project Trip Generation and Distribution*

As recommended by the LADOT, the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition, 2017) was used to develop the traffic characteristics of the Project's proposed use. Information was obtained from the Trip Generation Manual for ITE Land Use Code (LUC) 221 – Multi-Family Housing (Mid-Rise). In addition to the ITE trip generation information, local peak-hour trip generation rates for multi-family mid-rise residential land uses in Dense Multi-Use Urban areas were provided by the LADOT, based on empirical surveys performed in the City of Los Angeles. As the ITE and City's Dense Multi-Use Urban setting trip rates already account for transit availability and use, no transit adjustments were made. Table 5 of the TIA presents the trip generation rates used to generate the daily and peak-hour traffic volumes for the Project. Table 12, below, summarizes the estimated trip generation for the Project. As shown, once completed and occupied, the proposed Project is anticipated to generate a total of 259 trips per day, with 31 trips during the AM peak hour and 30 trips during the PM peak hour. These peak-hour trips were distributed to analyze Project impacts at the four study intersections.

With respect to trip distribution, the primary factors affecting the trip distribution patterns are the nature of the proposed use, existing traffic patterns, characteristics of the surrounding roadway system, geographic location of the Project site and its proximity to freeways and major travel routes, employment centers to which residents would likely be attracted, and the various regions generating visitors. Additionally, as many of the residents of the proposed Project would be UCLA faculty members, additional consideration was taken in the development of the trip distribution patterns to account for trips to and from the UCLA campus. Based on these factors, the overall Project trip distribution percentages were determined and then disaggregated and assigned to specific routes and intersections that are expected to be used for Project access/egress. The Project's trip distribution percentages are presented in Figure 19.



LEGEND:  
XX% : INBOUND PERCENTAGE  
(XX%) : OUTBOUND PERCENTAGE

Source: Crain & Associates, 2019

## Project Trip Distribution Percentages

## Figure 19

Hilgard Faculty Housing Project





**TABLE 12  
PROJECT TRIP GENERATION SUMMARY**

Land Use	ITE Code	Intensity <sup>2</sup>	Average Weekday	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation Rates									
Multi-Family Housing (Mid-Rise)	221	1 du	2.59	12%	88%	0.31	72%	28%	0.30
Trip Generation Summary									
Description	Size	Average Weekday	AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
Proposed Uses									
Residential									
Multi-Family Housing (Mid-Rise)	100 du	259	4	27	31	22	8	30	
Proposed Project Trips		259	4	27	31	22	8	30	
Notes:									
<sup>1</sup> ITE <i>Trip Generation Manual</i> (10 <sup>th</sup> Edition, 2017) and City of Los Angeles local trip generation rates and directional distributions applied for Land Use Code 221 (Multi-Family Housing [Mid-Rise]) in the Dense Multi-Use Urban (DMUU) setting. This land use code was chosen as mid-rise multi-family housing includes “apartments, townhouses, and condominiums located within the same building with at least three other dwelling units and that have between three and ten levels (floors).” The DMUU setting was used given that it best represents the Project location									
<sup>2</sup> du = Dwelling Units									
Source: Crain 2020.									



Applying the inbound and outbound percentages to the proposed Project trip generation, the traffic volumes for the proposed Project were determined for the four study intersections. The Project-only AM and PM peak-hour traffic volumes are depicted in Figures 20 and 21, respectively.

### *Intersection Impact Analysis*

For purposes of determining the significance of the proposed Project's impacts at study intersections in this IS, UCLA is applying LADOT's policy. Therefore, a significant impact is identified as an increase in the volume/capacity (V/C) ratio, due to Project-related traffic under future buildout conditions, of 0.010 or more when the final (with Project) LOS is E or F, a V/C ratio increase of 0.020 or more when the final LOS is D, or an increase of 0.040 or more when the final LOS is C. No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic delays.

### *Existing Plus Project Conditions*

The Existing (2019) Plus Project traffic volumes were determined by superimposing the Project-only traffic volumes onto the Existing (2019) traffic volumes. The Existing (2019) Plus Project traffic volumes at the study intersections are shown in Figures 7(a) and 7(b), of the TIS included in Appendix F, for the AM and PM peak hours, respectively. The results of the analysis of Existing (2019) Plus Project traffic conditions at the study intersections are summarized in Table 11. As shown, following the addition of Project-related traffic to Existing traffic conditions, all intersections would maintain the same LOS during both peak hours. Three study intersections would continue to operate at LOS A during both peak hours, while Glendon Avenue & Wilshire Boulevard would operate at LOS A and LOS C during the AM and PM peak hours, respectively. Based on the established significance criteria and as shown previously in Table 11, the Project would not significantly impact any of the study intersections during either peak hour.

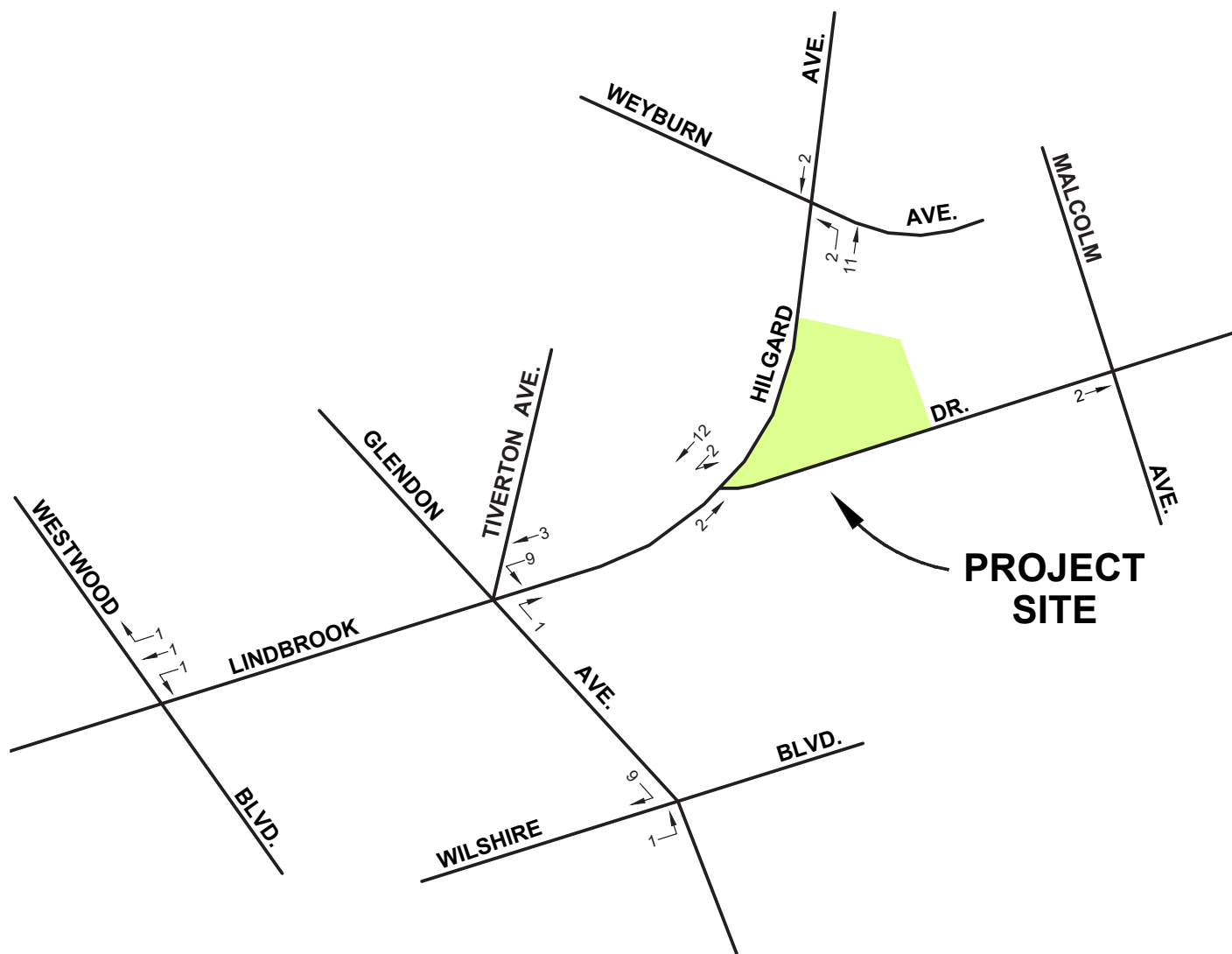
### *Future (2023) Traffic Conditions*

There are a number of other projects either under construction or planned for development in the surrounding area that may contribute future traffic to the study intersections. For this reason, the analysis of future traffic conditions was expanded to include potential traffic volume increases expected to be generated by those other projects. For the analysis of future conditions, an ambient traffic growth factor of 1.0 percent per year, compounded annually, was applied to the existing volumes at the four study intersections to develop future year (2023) baseline traffic volumes. Given that the Project is currently estimated to be fully constructed in November 2022, 2023 was conservatively selected as the future study year when the Project would be occupied.

The inclusion of the annual growth factor generally accounts for area-wide traffic increases. To ensure a conservative estimate of cumulative traffic conditions, the traffic generated by "related projects" in the study area was also added to the future baseline traffic volumes.<sup>21</sup> The list of related projects that might be developed or under construction within the study time frame were obtained from the LADOT and City of Los Angeles Department of City Planning. Recently published transportation impact studies and environmental reports for development projects in the area were also reviewed. The total future volumes, including those due to related projects,

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<sup>21</sup> It is likely that some of the identified projects will not be approved or constructed as described. It is also probable that some of these projects will be delayed in their construction beyond the future (buildout) study year of the Project (2023). In addition, none of the mitigation measures proposed in the traffic analyses performed for these related projects have been assumed under future conditions. Therefore, the future condition of the study area roadway infrastructure has also been forecast conservatively.



**PROJECT SITE**

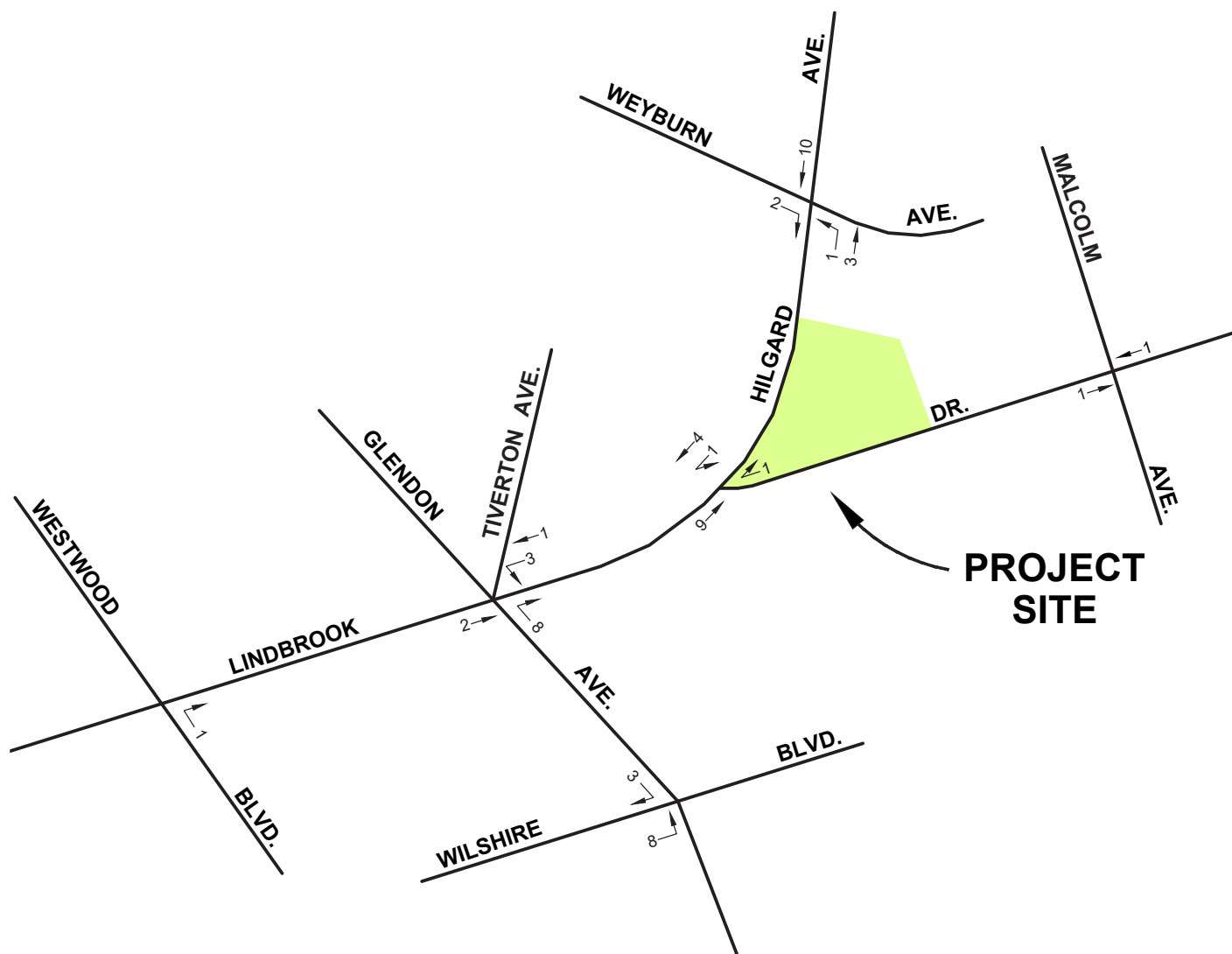
Source: Crain & Associates, 2019

## Project Traffic Volumes AM Peak Hour

*Hilgard Faculty Housing Project*

**Figure 20**





Source: Crain & Associates, 2019

## Project Traffic Volumes PM Peak Hour

*Hilgard Faculty Housing Project*

Figure 21



formed the basis for the Future (2023) Without Project condition. Finally, the traffic expected to be generated by the Project was analyzed as an incremental addition to the Future (2023) Without Project condition, resulting in the Future (2023) With Project condition. Existing roadway geometrics and/or traffic control conditions are assumed for the analysis of future area traffic conditions since no traffic or bicycle facility improvements were identified as scheduled for implementation that would affect use of the existing street system.

The results of the analysis of future traffic conditions at the study intersections are also summarized in Table 11. As shown, under Future (2023) Without Project conditions, traffic operations are expected to degrade slightly when compared with existing conditions due to the ambient and related project traffic volume growth. Under Future (2023) Without Project conditions, three of the four study intersections would operate at LOS A during both peak hours. The intersection of Glendon Avenue & Wilshire Boulevard would continue to operate at LOS A during the AM peak hour and LOS C during the PM peak hour.

Under Future (2023) With Project conditions, following the addition of Project-related traffic to Future (2023) Without Project conditions, all intersections would maintain the same LOS during both peak hours. Three of the four study intersections would continue to operate at LOS A during both peak hours, while Glendon Avenue & Wilshire Boulevard would operate at LOS A during the AM peak hour and LOS C during the PM peak hour. The CMA/LOS calculation worksheets are provided in the TIS included in Appendix F of this IS. Based on the established significance criteria and as shown previously in Table 11, the Project would not significantly impact any of the study intersections during either peak hour.

#### Congestion Management Program (CMP)

The traffic impact guidelines of the current 2010 CMP for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations are to be analyzed where a project could add 150 or more trips in either direction during the peak hours. Based on a review of the Project trip generation, the Project is expected to generate a total of 31 trips in the AM peak hour and 30 trips in the PM peak hour. Therefore, with Project traffic contribution is well below the trip thresholds established for CMP facilities. No significant Project impacts to CMP facilities would result and no additional analysis is necessary.

#### Residential Street/Neighborhood Intrusion Impact Analysis

In order to address local residential neighborhood concerns, the LADOT requires the preparation of a residential street impact analysis if a development project meets certain conditions. These conditions include the proposed development project being non-residential and non-school in nature, with an anticipated significant traffic contribution to a congested arterial (with intersections operating at LOS E or F) in the presence of local residential street(s) that provide viable alternate route(s). As the proposed Project is residential in nature, it does not meet the requirements for the preparation of a residential street segment analysis and no further analysis is required.

#### Construction Traffic

Construction traffic resulting from the proposed Project would primarily be associated with construction workers commuting to and from the Project site; removal of demolition materials associated with removal of existing hardscape features; delivery of building materials; transport of construction equipment (including large equipment); and export of soil. Construction workers do not commute during peak hours as they arrive prior to morning (AM) peak hour and leave prior to the evening (PM) peak hour. The use of heavy trucks for the transport and disposal of building

materials, equipment, and soils would occur periodically throughout the workday but largely outside of peak hours. For the proposed Project, the peak days for construction-related heavy truck traffic would occur when haul trucks are transporting soils that are being exported from the Project site.

As discussed in Section II, Project Description, of this IS, it is conservatively estimated that on peak days there would be up to 45 round truck trips per day during the grading and excavation period (estimated to be two months). Using the conservative assumption that all trips would be generated by a tractor-trailer combination (for which each truck trip is equivalent to 2.5 vehicle trips) peak construction traffic of approximately 113 car-equivalent round trips per day could result. These trips would occur over a typical eight-hour construction day; however, it is conservatively estimated that the truck trips would occur over six hours. Therefore, approximately 19 equivalent round truck trips would be generated during an average hour. With a typical construction day starting at 7:00 AM, approximately 19 equivalent round trips would be generated during the AM peak hour during the period of heaviest construction activity. Construction would typically be completed each day prior to the PM peak hour; therefore, no PM peak hour impacts are anticipated. The proposed Project incorporates PP 4.13-5, which requires one travel lane in each direction, to minimize construction traffic impacts to the extent feasible. Therefore, potential proposed Project-related traffic impacts associated with lane closures and access restrictions during construction would be less than significant.

Construction of the proposed Project is expected to be completed in November 2022 and would occur at the same time as other major UCLA construction projects, including the LeConte Undergraduate Apartments (construction estimated to be completed by December 2021), Lot 15 Residence Hall (construction estimated to be completed by November 2021), and Southwest Campus Apartments (construction estimated to be completed by July 2022) (refer to the Campus Map presented in Figure 2, which identifies the location of these projects). Although heavy truck trips generated by construction activities associated with the proposed Project (which would be initiated in October 2020) would occur concurrently with on-campus construction activities, excavation activities and associated heavy truck traffic for these projects has already been completed or will be completed before the proposed Project construction is initiated. Therefore, the heavy truck traffic resulting from the proposed Project would not overlap with similar construction periods for other major projects on campus. Regardless, the proposed Project incorporates PP 4.13-2, which requires coordination of major construction projects on and adjacent to campus to reduce construction-related contribution to cumulative traffic impacts. Therefore, this impact would be less than significant.

### Alternative Modes of Transportation

#### *Transit Facilities*

The proposed Project is located in a transit priority area, which is defined as an area that is within 0.5 mile of a major transit stop that is existing or planned. The roadways adjacent to the Project site and the UCLA campus are served by a variety of bus lines managed by multiple transit operators that include: Metro, Santa Monica Big Blue Bus (BBB), Culver City Bus, LADOT Commuter Express, Santa Clarita Transit, and the Antelope Valley Transit Authority. The nearest bus stop to the Project site is located approximately 0.2 mile southwest at the Westwood Boulevard/Wilshire Boulevard intersection. Additionally, UCLA runs its own bus network, branded as BruinBus, providing service within the campus and point-to-point connections to off-campus housing and amenities; the nearest Bruin bus stop to the Project site is one block away at the Hammer Museum. Los Angeles World Airports and Amtrak also operate bus service near the UCLA campus, which connect to air and rail facilities, respectively. The Westwood/Rancho Park Light Rail Station is located approximately 2.5 miles south of the Project site and provides

additional transfer opportunities to other regional destinations. Additionally, the Metro Purple Line extension to Westwood has been initiated and is expected to be completed by 2026 (Metro 2019). The Westwood/UCLA Station is approximately 0.25 mile from the Project site and would be easily accessible to Project residents, reducing the drive alone rate. Transit connections in the general vicinity of the Project site and the UCLA campus are shown in Figure 22. The bus lines in close proximity to the Project site are summarized in the TIS included in Appendix F.

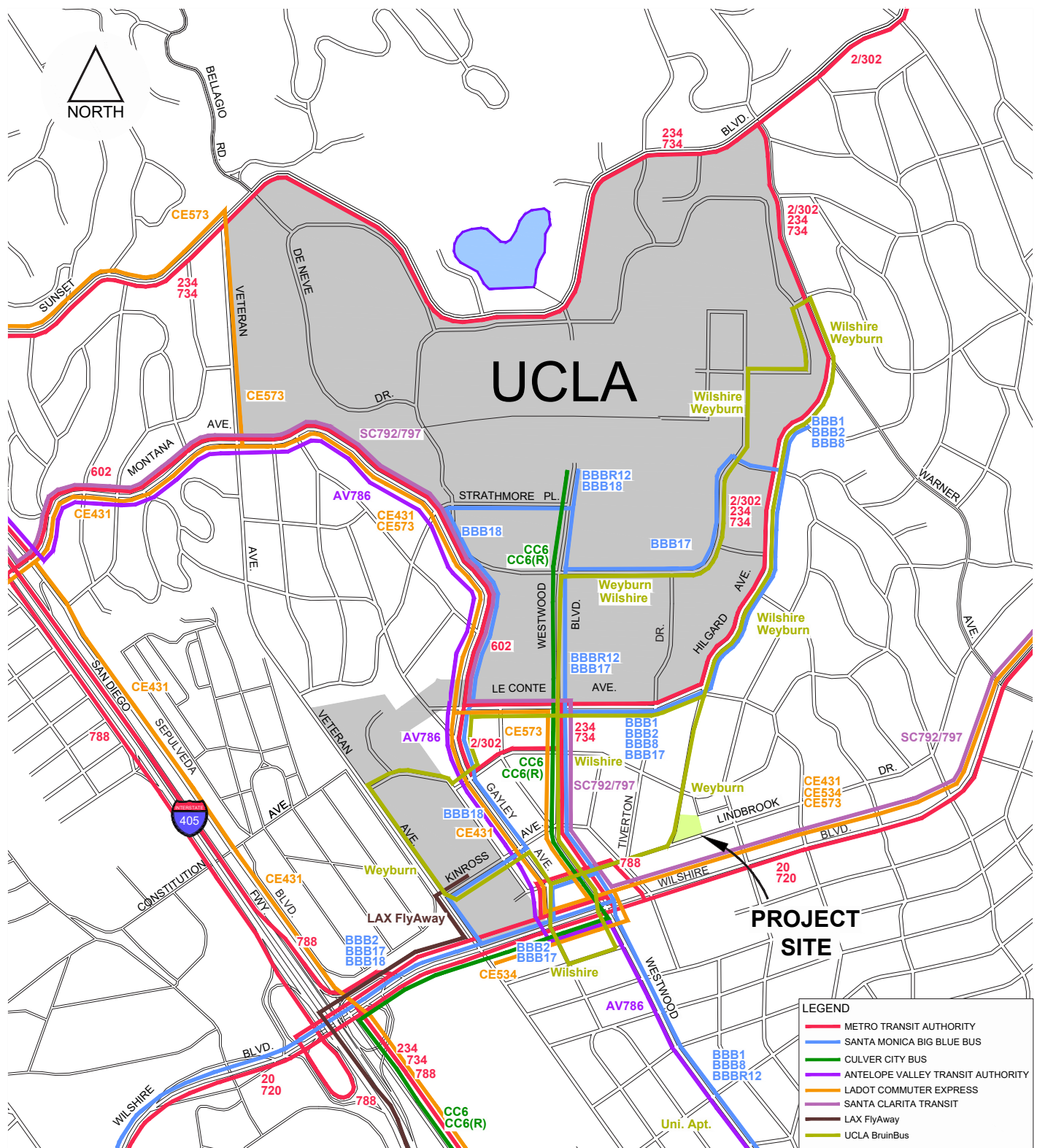
The proposed Project does not include the installation of a new bus stop, the relocation of an existing bus stop, or the modification of an existing bus stop. However, the Project site and surrounding area are well served by public transit. When transfer opportunities are considered, the Project site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

The CMP also requires that all projects consider potential transit impacts. Transit adjustments to the trip generation estimates for the proposed Project were not applied since the trip generation rates applied to the Project's proposed residential uses already account for transit availability and usage. As the proposed Project is located within 0.25 of the major transit stop located at the intersection of Westwood Boulevard and Wilshire Boulevard, a transit/walk factor of 15 percent of total person trips was conservatively assumed to calculate the person transit trips for this analysis. This transit/walk factor is consistent with the LADOT Transportation Impact Study Guidelines (December 2016). As previously identified, the net Project vehicular trip generation is estimated at 259 vehicles per day, with 31 AM peak-hour and 30 PM peak-hour trips, which reflect transit adjustments.

Given that the proposed Project's vehicular trip generation totals exclude transit trips, these trips correspond to the 85 percent of vehicle trips accessing the site via non-transit facilities. Therefore, to calculate the remaining 15 percent of trips via transit facilities, the total number of vehicle trips generated by the proposed Project was converted to person trips (conversion factor of 1.4), which represents 85 percent of all person trips. From this number, the number representing the remaining 15 percent of person trips to/from the site via transit can be determined by multiplying by a factor of 0.1765 ( $15 \div 85$ ). Based on these calculations, which are detailed in the TIS included in Appendix F, the proposed Project would generate 64 daily person transit trips, eight AM peak-hour person transit trips, and seven PM peak-hour person transit trips. Given that the capacity of one standard bus is 40 riders, and there are 25 bus lines with a reasonable walking distance of the Project site with several more bus lines slightly outside the reasonable walking distance and nearby connections to rail transit, these daily and peak-hour levels of Project transit ridership are anticipated to have a minimal impact on the surrounding transit network. Therefore, it is expected that the incremental additions of Project person transit trips would not have a significant impact on transit service in the study area.

### *Bicycle and Pedestrian Facilities*

There are no bike lanes located along Lindbrook Drive or Hilgard Avenue; however, there are sidewalks along both sides of these roadways. The proposed Project would align with the City's Vision Zero Los Angeles Initiative. Vision Zero was launched by Executive Order Number 10 in August 2015 with the goals of reducing traffic fatalities by 20 percent by 2017 and eliminating all traffic fatalities citywide by 2025. Vision Zero specifically seeks to implement traffic safety treatments at intersections and along roadway segments to improve safety for pedestrians, bicyclists, and other vulnerable road users. Development projects proposed on a roadway identified as part of the City's High Injury Network (HIN) should be designed to enhance safety. The Project is not located on a HIN roadway.



Source: Crain & Associates, 2019

## Project Area Transit Routes

*Hilgard Faculty Housing Project*

## Figure 22

PSOMAS



Although the Project is not located within the HIN, the Project would take measures to align with Vision Zero policies. The proposed Project would include short-term bicycle storage racks for at least 2.5 percent of all peak visitors and long-term bicycle parking spaces for at least 30 percent of all regular building occupants (with no less than one storage space per residential unit), thereby incentivizing Project residents and visitors to travel via bicycle to/from the Project site. Further, the proposed Project would create a development with pedestrian entrances directed toward Hilgard Avenue and Lindbrook Drive to provide strong connectivity to Westwood Village and the UCLA campus, thus enriching the existing pedestrian/bicyclist experience and activating the block as a pedestrian/bicyclist-safe environment.

In summary, the proposed Project would not result in any vehicular traffic impacts during construction or operation, and is within a transit priority area with access to multiple transit facilities. Further, the existing UCLA TDM program would also serve the proposed Project, consistent with PP 4.13-1(d), which is incorporated into the proposed Project. Project residents would have access to a full range of existing campus TDM programs, including, but not limited to: campus transit; accommodations for the use of other modes of transportation, including walking, bicycles, motorcycles, and scooters; on-campus car share program; zip cars; public transit incentives; and use of UCLA's Commuter's Guide. The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### ***Discussion***

Following the passage of SB 743, the State of California's Governor's Office of Planning and Research (OPR) was tasked with developing new guidelines for evaluating transportation impacts under CEQA. These guidelines were intended to shift the transportation performance metric from automobile delay and LOS to one that would promote the reduction of greenhouse gas emissions and the development of multimodal and diverse transportation networks. As a result, Section 15064.3, Determining the Significance of Transportation Impacts, was added to the State CEQA Guidelines as part of a recent update (December 2018). OPR determined that, under the update to the CEQA guidelines, VMT would be established as the primary metric for evaluating environmental and transportation impacts.

Pursuant to State CEQA Guidelines Section 15064.3(c), the City of Los Angeles has until July 1, 2020, to implement CEQA Guidelines Section 15064.3(b). The LADOT updated the City's Transportation Assessment Guidelines (TAG) in July 2019 to conform to the requirements of SB 743. The TAG replaced the Transportation Impact Study Guidelines (December 2016) and shifted the performance metric for evaluating transportation impacts under CEQA from LOS to VMT for studies completed within the City.

Under the updated TAG, two forms of VMT are analyzed: (1) household VMT per capita and (2) work VMT per employee. The household VMT per capita is the home-based VMT produced by the residential component of a development project divided by the number of residents within the development. The work VMT per employee is the home-based work VMT attracted by the non-residential uses of a development project divided by the number of employees within the development. As outlined in the updated TAG, in order for a proposed development to have a less than significant VMT impact, two criteria must be met: (1) the development project's household VMT per capita must not exceed 15 percent below the average household VMT per capita, and (2) the development project's work VMT per employee must not exceed 15 percent below the average work VMT per employee. The thresholds corresponding to 15 percent below the average household VMT per capita and the average work VMT per employee were determined individually for each of the seven Area Planning Commission (APC) areas within the City and are shown in Table 11 of the TIS included in Appendix F. The Area Planning Commission area in which a development project is located determines the appropriate thresholds that are to be applied.

Along with the updated TAG, LADOT developed the City of Los Angeles VMT Calculator Version 1.2 (the "VMT Calculator"), which calculates the daily vehicle trips, daily VMT, daily household VMT per capita, and daily work VMT per employee for development projects. Additional information regarding the VMT Calculator is provided in the TIS included in Appendix F.

Although UCLA is not required to follow the LADOT traffic impact analysis requirements, it is important to note that the TIS for the proposed Project was initiated based on the previous LADOT Transportation Impact Study Guidelines (December 2016) and therefore a VMT analysis would not be required per LADOT requirements. However, a supplemental VMT analysis has been performed per the new TAG for information purposes to provide a more comprehensive evaluation of the Project's transportation impacts. The VMT Calculator estimated that the proposed Project would generate the following baseline trip estimates: 381 daily vehicle trips<sup>22</sup> and 1,928 daily VMT. Based on the 1,928 daily VMT, the proposed Project would generate a daily household VMT per capita of 5.2. As the Project is entirely residential in nature, the Project would not generate work VMT per employee. Since the proposed Project is located within the West Los Angeles Area Planning Commission area, the appropriate threshold of significance with which to compare the proposed Project's VMT estimates is 7.4 daily household VMT per capita. Therefore, the Project would not have a significant VMT impact (Crain 2020).

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

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<sup>22</sup> The daily trip estimates produced by the VMT Calculator (381) differ from those calculated for the Project trip generation in Table 11. This discrepancy is due to the VMT Calculator using trip generation rates from an older version of the ITE Trip Generation Manual, with no variation based on the size of the multi-family use (low-rise, mid-rise, or high-rise) and refinements based on the City's Travel Demand Forecasting Model.

## Level of Significance

The proposed Project would not or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

### Vehicular Hazards during Construction

The proposed Project does not involve any long-term changes to public roadways, service roads, or other vehicular circulation routes. As described in Section II.5, Proposed Project Components, of this IS, access to the site would be provided from I-405, Wilshire Boulevard, Glendon Avenue, Lindbrook Drive, and Hilgard Avenue. Construction activities associated with the proposed Project could result in the temporary closure of traffic lanes or roadway segments along Hilgard Avenue and Lindbrook Drive during various construction activities, including, but not limited to, accommodating the delivery of construction; providing adequate site access for construction vehicles and equipment; and installation of utility infrastructure.

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

In addition, implementation of PP 4.13-5, which requires maintenance of one travel lane in each direction and/or the provision of signal carriers (i.e., flagpersons) when only a single lane can be maintained, ensures that impacts associated with a construction-related traffic lane or roadway closures remain less than significant.

### Pedestrian Hazards during Construction

There are existing sidewalks located along each side of Hilgard Avenue and Lindbrook Drive in the vicinity of the Project site. To avoid conflicts/potential hazards to pedestrians during construction, the section of sidewalk adjacent to the Project site may be closed to pedestrians during portions of the construction period. Pedestrians in the Project area would be directed to the sidewalk on the opposite side of the street. Safe pedestrian movement within and around the Project area and access to the nearby uses would be maintained as efficiently as possible. With incorporation of PP 4.13-6, which requires appropriate signage of alternate pedestrian routes into the proposed Project, there would be less than significant impacts related to pedestrian hazards during construction.

### Vehicular Hazards during Operation

The proposed Project does not include permanent modifications to City of Los Angeles roadways. As shown on Figure 9 of this IS, vehicular access/egress for the subterranean parking level would be provided from a new driveway on Hilgard Avenue (in the northwest portion of the Project site). The existing loading zone on Lindbrook Drive would be maintained, but the loading zone on Hilgard Avenue would be relocated, closer to the building lobby entrance. Fire and other emergency vehicular access would be provided from Hilgard Avenue and Lindbrook Drive. Any abandoned driveways would be removed and replaced with full-height curb and sidewalk. Therefore, implementation of the proposed Project would not increase hazards due to design features or incompatible uses. Operation of the proposed Project would result in a less than significant impact related to vehicular hazards.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

The proposed Project would have a less than significant impact related to a substantial increase in hazards due to a design feature or incompatible uses.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### **Discussion**

#### Emergency Access during Construction

Construction activities along Hilgard Avenue and Lindbrook Drive may result in temporary closure of traffic lanes or roadway segments along these roadways to permit the delivery of construction materials; to transport soil; to accommodate the installation of utility infrastructure; or to provide adequate site access. The reduction of roadway capacity, the narrowing of traffic lanes, and the occasional interruption of traffic flow could impair emergency access. Construction activities would be planned so that access for emergency vehicles is maintained at all times. Additionally, implementation of PP 4.13-8 as part of the proposed Project would require consultation with emergency service providers in the event of lane or street closures. Therefore, there would be less than significant impacts related to emergency access during construction of the proposed Project.

#### Emergency Access during Operation

As shown in Figure 9 of this IS, with implementation of the proposed Project, emergency access to the proposed Project would be provided from various locations surrounding the Project site (Hilgard Avenue, Lindbrook Drive, and the access driveway to the north that serves the Church and existing residential uses). Consistent with UCLA standard procedures, the Campus Fire Marshal would review and approve the proposed Project to ensure that circulation and design

features allow adequate emergency vehicle access in compliance with the CBC. Therefore, there would be less than significant impacts related to emergency access during operation of the proposed Project.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

The proposed Project would have a less than significant impact related to emergency access.

## **18. TRIBAL CULTURAL RESOURCES**

Relevant elements of the proposed Project related to tribal cultural resources include excavation to a depth of up to 24 feet bgs that would extend into native soils.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. MM 4.4-2(c) presented in Section V.5, Cultural Resources, of this IS, is considered part of the proposed Project and is assumed in the analysis presented in this section.

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

### **Discussion**

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

have requested notice of projects proposed within that area. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document.

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

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

The Project site was previously developed and has been subject to previous ground disturbance. As discussed in Section 4.4, Cultural and Tribal Cultural Resources, of the LRDP Amendment (2017) Final SEIR, which is incorporated by reference, the SCCIC conducted a records search for the UCLA campus and the area within 0.25 mile of the campus, which includes the Project site, on February 23, 2016. The records search did not identify any historic or prehistoric archaeological sites at or near the Project site. As previously addressed in Section V.5, Cultural Resources, of this IS, there are no historic resources located at the Project site. Historic resources near the Project site are structures/buildings. No tribal cultural resources, including tribal cultural resources listed or eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources have ever been recovered or recorded on or near the Project site.

However, as previously addressed in Section V.5, Cultural Resources, excavation and grading at the Project site for the proposed Project is expected to disturb native alluvial sediments and, therefore, would have the potential to impact previously unidentified tribal cultural resources. The potential to encounter previously unidentified tribal cultural resources during construction is a potentially significant impact that would be reduced to a less than significant level with implementation of LRDP Amendment (2017) Final SEIR MM 4.4-2(c), which includes procedures to be taken by the project archaeologist if potential Native American artifacts are encountered.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

The proposed Project would have a less than significant impact related to the potential to cause a substantial adverse change in the significance of a tribal cultural resource as defined in Section 21074 of the *California Public Resources Code*.

## 19. UTILITIES AND SERVICE SYSTEMS

Relevant elements of the proposed Project related to utilities and service systems include the development of the Project site with approximately 120,000 gsf of residential building space to accommodate up to 100 apartment units for faculty housing (up to 200 beds) with an interior landscaped courtyard. Two levels of subterranean parking (approximately 50,000 gsf) would also be provided. The proposed Project would be designed to achieve a minimum LEED NC Silver rating with a target of achieving a LEED NC Gold rating. The proposed Project would also comply with all 2019 CALGreen mandatory requirements as well as the Tier 1 voluntary measure requirements for Los Angeles County. CALGreen overlaps with many of the Project's LEED strategies. The proposed Project would also participate in the Savings by Design building performance incentive program administered by the LADWP under the auspices of the California Public Utilities Commission (CPUC). The design, construction, and operation of the proposed Project would include a series of green building strategies, including exceedance of Title 24 energy efficiency requirements by 20 percent, as required by the UC Policy on Sustainable Practices.

While this IS is not tiered from the LRDP Amendment (2017) Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the proposed Project and are assumed in the analysis presented in this section.

- PP 4.14-2(a)** *New facilities and renovations (except for patient care facilities in the Medical Center) shall be equipped with low-flow showers, toilets, and urinals.*
- PP 4.14-2(b)** *Measures to reduce landscaping irrigation needs shall be used, such as automatic timing systems to apply irrigation water during times of the day when evaporation rates are low, installing drip irrigation systems, using mulch for landscaping, subscribing to the California Irrigation Management Information System Network for current information on weather and evaporation rates, and incorporating drought-resistant plants as appropriate.*
- PP 4.14-2(c)** *The campus shall promptly detect and repair leaks in water and irrigation pipes.*
- PP 4.14-2(d)** *The campus shall minimize the use of water to clean sidewalks, walkways, driveways and parking areas.*
- PP 4.14-3** *The campus shall continue to implement a solid waste reduction and recycling program designed to limit the total quantity of campus solid waste that is disposed of in landfills during the LRDP horizon.*
- PP 4.14-9** *The campus shall continue to implement energy conservation measures (such as energy-efficient lighting and microprocessor-controlled HVAC equipment) to reduce the demand for electricity and natural gas. The energy conservation measures may be subject to modification as new technologies are developed or if current technologies become obsolete through replacement.*

In addition, PP 4.15-1, discussed under the Greenhouse Gas Emissions analysis (Section V.8 of this IS), requires implementation of the provisions of the UC Policy on Sustainability Practices; and PP 4.7-1, PP 4.7-5, and MM 4.7-1, discussed under the Hydrology and Water Quality analysis (Section V.10 of this IS), requires development and implementation of Best Management Practices (BMPs) to manage runoff, are also incorporated in the proposed Project.



## **Project Impact Analysis**

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## ***Discussion***

As previously described in Section II.5, Project Components, of this IS, under the discussion of Utilities/Infrastructure, and as shown on Figure 11, Conceptual Utilities Plan and Grading Layout, municipal and private utility infrastructure necessary to serve the Project is currently existing in Hilgard Avenue and Lindbrook Drive, adjacent to the Project site, as summarized below.

- Sewer.** The City of Los Angeles provides wastewater transmission facilities from the site to the City of Los Angeles Hyperion Water Reclamation Plant (HWRP). As discussed under Threshold c, below, the proposed Project would not exceed the capacity of the HWRP; therefore, no new or expanded wastewater treatment facilities are required. There is an existing 18-inch diameter City of Los Angeles sewer line in Hilgard Avenue and an 8-inch-diameter City sewer line in Lindbrook Drive. Connection to either line to serve the proposed Project is possible. The City of Los Angeles Bureau of Engineering (BOE) has confirmed that there is capacity available in either the existing 18- or 8-inch-diameter sewer lines for 100 percent of the anticipated wastewater generation of up to 13,480 gallons per day (gpd) from the proposed Project (BOE 2019a, 2019b). No construction of new or expanded City wastewater infrastructure would be needed with Project implementation.

The proposed Project would include installation of new gravity sewer laterals and associated facilities with connections to one of the existing sewer lines in the adjacent roadways. These components would be within the construction impact footprint for the proposed Project.

- Water.** Domestic and fire water needs of the proposed Project would be provided through connections to the existing City water lines in the adjacent roadways. A dedicated water booster pump would be installed. There is an existing 6-inch LADWP water line in Hilgard Avenue and an 8-inch LADWP water line in Lindbrook Drive. Connection to either line to serve the proposed Project is possible. The LADWP has confirmed that there is capacity available in either of these water lines to meet the domestic and fire flow needs of the proposed Project (LADWP 2019b, 2019c). No construction of new or expanded LADWP water lines would be needed with Project implementation. The water line connection and booster pump would be within the construction impact footprint for the proposed Project.
- Storm Water Drainage Infrastructure.** As discussed in Section V.10, Hydrology and Water Quality of the IS, under existing conditions storm water runoff drains as sheet flow from the Project site to an existing 42-inch-diameter City of Los Angeles storm drain line in Hilgard Avenue. As discussed previously in Section II.2, Environmental Setting, of this IS, the Project site is currently vacant; however, it was previously developed with the Church auditorium and associated hardscape and landscape. As with previous developed

conditions, the runoff from the Project site would also discharge to the City's 42-inch-diameter storm drain line in Hilgard Avenue. The proposed Project is required to meet LID requirements. Storm water BMPs would be designed and constructed within the Project site to treat storm water, remove pollutants, and control the discharge flow rate. The Phase II Small MS4 General Permit, which applies to UCLA projects, prioritizes BMP types as follows: infiltration, storage and reuse, and biofiltration. The conceptual utility plan anticipates installation of a cistern in the southwestern corner of the Project site, which would capture and hold runoff.

While there would be an increase in runoff entering the City of Los Angeles drainage system compared to existing conditions, through compliance with the Phase II MS4 requirements, storm water drainage would be controlled such that the construction of new or expanded City of Los Angeles storm drainage facilities would not be necessary. Storm water management and water treatment facilities required for the proposed Project would be within the construction impact footprint for the proposed Project.

- **Electricity, Natural Gas, and Telecommunications.** LADWP would provide electric service to the Project site and natural gas service would be provided by the Southern California Gas Company (SoCal Gas). Electricity and natural gas would be supplied to the proposed Project via connections to existing lines located in Hilgard Avenue. A new transformer would also be installed on site. Because the University of California does not allow the use of natural gas for water heating, a solar thermal tank would be provided as part of the proposed Project. Natural gas would be used solely for cooking and the clothes dryer in each unit. An emergency generator would also be provided and is expected to be located in the parking garage level 1. Telecommunications facilities would connect to an existing telecommunications manhole in Hilgard Avenue near the northwest corner of the Project site. The proposed Project would include connections to existing dry utility infrastructure in Hilgard Avenue adjacent to the Project site, and the installation of on-site infrastructure and facilities as necessary to serve the proposed Project. New utility infrastructure and facilities to be constructed would occur within the construction impact area identified for the proposed Project.

In summary, the on-site utility infrastructure and facilities necessary to serve the Project—including water, sewer, drainage, water quality treatment, and dry utilities (e.g., electricity, natural gas, telecommunications)—would be installed within or adjacent to the Project site and would connect to the existing utility lines within the adjacent roadways. No new or expanded utility lines or facilities are required off site, except as needed for the utility connections. The physical impacts that would result from the installation of utility infrastructure have been addressed in the analysis presented throughout this IS/MND and would be less than significant. No additional impacts would occur and no additional mitigation is required.

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

Less than significant impact related to construction of wastewater conveyance, storm drainage, and dry utility (i.e., electricity, natural gas, telecommunications) infrastructure; and no impact related to capacity of existing wastewater treatment facilities.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

The LADWP supplies domestic water to City of Los Angeles, including the Project site, and ensures that the water meets all applicable State water quality standards. Section 4.14, Utilities and Service Systems, of the LRDP Amendment (2017) Final SEIR, which is incorporated by reference, includes a discussion of domestic water service provided by LADWP. The Water Supply Assessment included in Appendix I of the Final SEIR provides detailed information about water demands, water supply, and water supply reliability. The Los Angeles Aqueducts (LAA), local groundwater, purchased imported water from the Metropolitan Water District of Southern California, and recycled water are the primary sources of water supplies for the City. In their 2015 Urban Water Management Plan (UWMP), LADWP developed a water demand forecast through the year 2040 with passive conservation including codes, ordinances, and conservation phases for each of the major categories of demand. LADWP is projected to have sufficient water supply to meet all demands for normal year, single-dry year, and multiple-dry year conditions through the planning period (2020 to 2040) (LADWP 2016).

The projected water demand for the proposed Project has been calculated at 8,000 gpd (0.008 million gallons per day [mgd]) based on an occupancy of 200 persons. It should be noted that the estimated domestic water demand is less than the wastewater generation estimated by the City of Los Angeles BOE (13,480 gpd), which does not take into consideration the LEED design features of the proposed Project. These include, but are not limited to: incorporating a high-efficiency irrigation system and native/drought-tolerant species to reduce landscape irrigation demands; selecting water fixtures (e.g., taps, toilets, shower heads, and other fixtures) to achieve a reduction in water demand and increase water efficiency (consistent with PP 4.14-2[a]); and, using recycled/reclaimed storm water for irrigation. Further PPs 4.14-2(b) through 4.14-(d) from the LRDP Amendment (2017) Final SEIR are incorporated into the Project which require reducing irrigation needs; promptly detecting and repairing water and irrigation pipe leaks; and minimizing the use of water to clean walkways and other hardscape, respectively.

The estimated water demand of approximately 2.92 mg/yr<sup>23</sup> (approximately 8.96-acre feet per year [afy]<sup>24</sup>) would represent approximately 0.001 percent of the City's 709,500 afy total projected water demand without planned additional City water conservation measures, as presented in the 2015 UWMP. Further the Project site has General Plan land use and zoning designations that anticipated multi-family residential development; these land uses designations are a factor in determining the overall water demands for the City in the UWMP. Therefore, water usage for the proposed Project would be within the established demand projections of the LADWP as outlined in the current 2015 UWMP. There would be sufficient water supplies for implementation of the Project and a less than significant impact related to water supply would occur.

<sup>23</sup> (0.008 mgd \* 365 = 2.92 million gallons per year)

<sup>24</sup> (2,920,000 gallons per year / 325.850 = 8.96-acre feet/yr)

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

The proposed Project would have a less than significant impact related to the availability of sufficient water supplies to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years.

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

### **Discussion**

The City of Los Angeles provides wastewater (or sewer) transmission facilities from the Project area to the City's HWRP located in Playa del Rey directly west of the Los Angeles World Airport. The HWRP treats wastewater from most of the City of Los Angeles and 29 contracting cities and agencies. Wastewater generated by the proposed Project would be treated by the HWRP.

Because the amount of wastewater entering HWRP can double on rainy days, the HWRP was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons of water per day (mgd) and peak wet weather flow of 800 mgd. On average 275 million gallons of wastewater enters the HWRP on a dry weather day (LA Sanitation 2019). Therefore, the HWRP currently operates at approximately 61 percent of its capacity, with approximately 175 mgd of available dry weather capacity. The proposed Project's estimated wastewater generation of 0.008 mgd, represents a negligible amount of the HWRP's remaining daily capacity. There would be no impact related to adequate wastewater treatment capacity to serve the Project's projected demand in addition to the provider's existing commitments.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures are required.

### **Level of Significance**

The proposed Project would have no impact related to the adequate wastewater treatment capacity to serve the project's projected demand in addition to the provider's existing commitments.

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

## Discussion

UCLA contracts with a private waste disposal company (Athens Services) to collect, recycle, and dispose of solid waste generated by UCLA facilities on and off campus. The hauler transports and deposits waste at the American Waste Transfer Station in Gardena. Following waste separation and sorting and recycling activities, the recovery facility then ships remaining waste to the Sunshine Canyon Landfill (which is partially located in both the County and City of Los Angeles) and/or the Chiquita Canyon Landfill (which is in unincorporated County of Los Angeles near the Community of Castaic). The combined maximum daily capacity and remaining permitted capacity of the Sunshine and Chiquita Canyon Landfills, as of December 31, 2017, is 22,100 tons/day and 127.14 million tons, respectively (LACPW 2019).

Section 4.14, Utilities and Service Systems, of the LRDP Amendment (2017) Final SEIR, which is incorporated by reference, provides a complete discussion of the regulatory framework for solid waste management relevant to UCLA projects. As discussed, AB 939 set diversion requirements of 25 percent in 1995 and 50 percent in 2000; jurisdictions select and implement the combination of waste prevention, reuse, recycling, and composting programs that best meet the needs of their community while achieving the diversion requirements. On October 6, 2011, Governor Brown signed AB 341, establishing a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020 and requiring the California Department of Resources Recycling and Recovery (CalRecycle) to provide a report to the legislature that recommends strategies to achieve the policy goal by January 1, 2014. Further, the CalGreen Code requires all new developments to divert 65 percent of non-hazardous construction and demolition (C&D) debris for all projects.

Notwithstanding the State's requirements, the UC Policy on Sustainable Practices, previously discussed in Section V.8, Greenhouse Gas Emissions, of this IS, establishes goals addressing waste reduction and recycling, which exceeds the established State requirements. Notably, the Policy for Zero Waste indicates that the University will achieve zero waste by 2020, at all locations including the proposed Project (but not including health locations). Minimum compliance for zero waste is 90 percent diversion of municipal solid waste from landfill. This requirement exceeds those established by AB 341 and the CalGreen Code.

The UCLA campus currently achieves a solid waste diversion of between 82 and 95 percent for construction waste (depending upon Project controls and waste haulers) and 77 to 80 percent for operations. Operational diversion is accomplished through various recycling and waste management programs, including but not limited to programs for food and beverage containers, plastics, paper, metals, green waste, food waste, construction waste, and electronics. UCLA also operates a SAFE Collection Center at the Environmental Health and Safety (EH&S) facility that

accepts off-campus residential hazardous and electronic waste for recycling at no charge. UCLA is able to monitor and enforce compliance with established diversion requirements through review of waste hauler receipts.

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

- **Construction.** Based on the USEPA new construction waste generation rates of 4.38 lbs/sf for residential structures (USEPA 2009), the proposed approximately 170,000 gsf of new construction would generate a total of approximately 372.3 tons (744,600 pounds) of solid waste. Because the former Church auditorium was previously demolished, there would be minimal demolition waste associated with Project implementation. As discussed in Section II.5, Proposed Project Components, some demolition of existing walls and hardscape on and off site, including on the Church property, would be necessary to implement the proposed Project. To account for this small additional source of construction waste, the construction waste estimate of 372.3 tons has been rounded up to 373 tons for purposes of this analysis.

A minimum LEED NC Silver rating for the proposed Project has been established, consistent with the UC Sustainable Practices Policy. The UCLA campus is currently committed to achieving at least 75 percent waste diversion, which includes demolition and other construction waste. This would reduce the total amount of construction waste for the proposed Project to approximately 93 tons, with a 75 percent waste diversion.

The combined maximum daily capacity and remaining permitted capacity of the Sunshine and Chiquita Canyon Landfills (the landfills that currently receive municipal solid waste generated at UCLA), as of December 31, 2017 (the most recent available data) is 22,100 tons/day and 127.14 million tons, respectively (LACPW 2019). Therefore, the total anticipated construction waste stream (93 tons) would be far less than the permitted daily capacity of the landfills that serve the campus. Specifically, the Project's construction waste would represent approximately 0.4 percent of the combined daily capacity and less than 1/10,000th of a percent (0.00007 percent) of the combined remaining capacity. The total construction waste stream would be disposed of at these facilities periodically over the construction period, rather than in one day. Therefore, construction of the proposed Project which incorporates PP 4.14-3 and PP 4.15-1 would result in a less than significant impact to landfill space.

- **Operation.** To estimate the solid waste generation of the proposed Project, UCLA conducted an audit of the solid waste generation of the existing Hilgard Apartments located at 720 Hilgard Avenue, which house graduate students, and prepared two scenarios based on this audit: regular volume and high volume. The results of these scenarios were averaged to provide a per resident rate of 3.2 lbs/day of solid waste generation, including the proportion that requires landfill disposal (1.4 lbs/day) after diversion efforts (Dudman 2019). As noted above, the proposed Project, though off campus, would be served by the same private waste disposal company as on-campus facilities, and therefore would be provided with the same collection, diversion, and disposal programs and facilities as on-campus development. Implementation of the proposed Project, with up to 200 residents, would result in an increased solid waste generation of approximately 117 tons/year<sup>25</sup> or 280 tons per day.

Continued waste diversion exceeding AB 939 requirements would be accomplished through UCLA's waste reduction and minimization efforts, as required by LRDP

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<sup>25</sup> 3.2 lbs/day x 200 residents = 640 lbs/day; 640 lbs/day x 365 = 233,600 lbs/yr; 233,600 lbs/yr / 2,000 lbs/ton = 116.8 tons/yr

Amendment (2017) Final SEIR PP 4.14-3. This includes, but is not limited to, recycling and use as green waste. The proposed Project includes a trash chute/recycling/compost room to facilitate these efforts.

Further, compliance with the UC Policy on Sustainable Practices is required (refer to Final SEIR PP 4.15-1), including provisions related to waste management practices. Specifically, consistent with the UC Sustainability Policy, UCLA is committed to achieving zero waste by 2020. With 100 percent solid waste diversion by 2020, there would be no landfill disposal of solid waste associated with operation of the proposed Project. However, with zero waste defined as 90 percent diversion of municipal solid waste from landfill, some of the solid waste generated at the Project site may be disposed of at the local landfills. To determine impacts on solid waste disposal resulting from implementation of the proposed Project, the projected net increase in the solid waste generation is compared to the total anticipated remaining capacity at landfills that serve the UCLA campus and off-campus facilities. The incremental daily increase in solid waste generation requiring landfill disposal with the proposed Project (28 lbs per day based on 90 percent diversion, or 0.01 tons/day) would represent a negligible amount of the combined maximum daily capacity (21,100 tons) of the two landfills serving UCLA. Therefore, based upon estimated solid waste generation of the proposed Project, the Sunshine Canyon and Chiquita Canyon Landfills have sufficient permitted capacity. Therefore, with incorporation of PPs 4.14-3 and PPs 4.15-1 into the proposed Project, there would be a less than significant impact related to solid waste disposal and no mitigation would be required.

#### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

#### ***Level of Significance***

The proposed Project would have less than significant impacts related to (1) solid waste generation in excess of landfill capacity, and (2) compliance with applicable federal, State, and local management and reduction statutes and regulations related to solid waste.



## 20. WILDFIRE

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

### Discussion

The Project site is not located in or near a “Selected Wildland Fire Hazard Area” as shown on Exhibit D of the City of Los Angeles General Plan Safety Element (City of Los Angeles 1996). Additionally, according to the California Department of Forestry and Fire Protection (CalFire), the Project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) (CalFire 2019). The Project site is located within the limits of the City of Los Angeles, and is therefore not within a State Responsibility Area. Therefore, the proposed Project would have no impacts related to wildfires or the associated issues identified in Thresholds a through d, above. No impacts would occur.

### Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

### Level of Significance

The proposed Project would have no impact related to wildfires.

## 21. MANDATORY FINDINGS OF SIGNIFICANCE

### Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project- Level Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE – The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to mitigation measures or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per Section 15065 of the State CEQA Guidelines):				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### ***Discussion***

As discussed in Section V.4, Biological Resources, of this IS, the proposed Project, which is in a developed urban area, would not impact special status plant and wildlife species, sensitive habitats, or wildlife corridors. The proposed Project incorporates MM 4.3-1(a) and MM 4.3-1(b) from the LRDP Amendment (2017) Final SEIR and, as a result, would have a less than significant impact on nesting birds. The proposed Project also incorporates Final SEIR MM 4.3-1(c) to ensure a less than significant impact related to removal of existing trees, and Final SEIR MMs 4.3-1(a) through 4.3-1(e) to address protection of trees to remain. Therefore, the potential for the proposed Project to degrade the quality of the environment related to biological resources would be a less than significant impact.

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

### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are required.

### ***Level of Significance***

The proposed Project would have a less than significant impact related to the potential to degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or

animal community; or substantially reduce the number or restrict the range of a Rare or Endangered plant or animal. The proposed Project would have a less than significant impact related to the potential to eliminate important examples of the major periods of California history or prehistory.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

As discussed under the analysis of Air Quality in Section V.3, Air Quality, of this IS, the proposed Project's construction and operational emissions would be directly less than significant. Therefore, consistent with SCAQMD policy, the cumulative construction and operational impacts of the Project would also be less than significant.

With respect to historic resources, as identified in the Historic Resource Project Impact Analysis provided in Appendix C of this IS (Page & Turnbull 2019), Westwood has had many recent projects and several planned. The two six-story apartment buildings on Wilshire Boulevard behind 10830 Lindbrook Drive and 10836-10840 Lindbrook Drive (HCMs 446 and 447) are The Legacy at Westwood Apartments at 10833 Wilshire Boulevard. This project was constructed in 2002 and is not considered a recent development for the purposes of the cumulative impact analysis. The following projects are in the immediate vicinity of the Project site and have the potential to impact the same list of known historic resources as those identified in Section V.5, Cultural Resources, of this IS:

- Plaza La Reina at 10850 Lindbrook Drive – This boutique hotel is a five-story, 44-room mixed-use complex that was constructed in 2016 as infill development. Architect Moule & Polyzoides designed the project as a contemporary interpretation of the Spanish Colonial Revival style. Plaza La Reina is thoughtfully designed to blend in with the massing and style along Lindbrook Drive. Its stepped massing, wide steps, exterior stucco, red tile roofs, and punched windows across a wide driveway from 10836-10840 Lindbrook Drive (HCM 447) are compatible with the historic building. The taller components of this project are set further away and broken up into balanced volumes to prevent the development from overwhelming or competing with the surrounding historic resources. The building's scale, massing, and design did not significantly alter the setting of 10830 Lindbrook Drive (HCM 446), 10836-10840 Lindbrook Drive (HCM 447), or the commercial retail building at 10841 Lindbrook Drive.
- Westwood Village Apartments at 1033 Hilgard Avenue – This five-story, multi-family building is an apartment complex originally built in 1977. The front facade was remodeled in January 2019. The facade remodel did not change the scale or massing of the building, which has been in place since 1977. While the building is not more compatible with the surrounding historic resources in terms of style or design, it is also not less compatible, as the original building did not address or defer to the surrounding 1930s buildings.

- The Agora at 900 S. Hilgard Avenue – A 16-story off-campus student housing development called “The Agora” is planned next door to the W Hotel (922 Hilgard Avenue). It is intended to have a total of 64 residential units with 231 bedrooms ranging from single bedrooms to five-bedroom plans. Privately owned, it will provide a dorm-style off-campus living option for UCLA students. The location of this project further north on Hilgard Avenue helps its proposed 16-story height blend with the taller existing buildings in this area, including the high-rise W Hotel next door and the Park Westwood Tower on the same block. It is sufficiently distant from the Project site not to have a cumulative impact on the HCMs or other lower scale historic resources on Malcom Avenue.

Overall, the proposed Project at Hilgard Avenue and Lindbrook Drive would not result in cumulative impacts to historic resources (Page & Turnbull 2019).

With respect to other topical issues, the proposed Project would have no impact, a less than significant impact, or a less than significant impact with continued implementation of applicable PPs and MMs from the LRDP Amendment (2017) Final SEIR, or implementation of Project-specific mitigation measures. Therefore, the proposed Project would not result in a cumulatively considerable contribution to any potential cumulative impacts, and no mitigation would be required.

#### ***Additional Project-Level Mitigation Measures***

No additional mitigation measures are feasible.

#### ***Level of Significance***

The proposed Project would have a less than significant impact related to impacts that are individually limited, but cumulatively considerable.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### ***Discussion***

As described in the analysis presented in Section V.1 through V.20, of this IS, potential impacts of the proposed Project are less than significant because the Project incorporates identified LRDP Amendment (2018) Final SEIR PPs and MMs, and new Project-specific MMs for potential construction-related noise and vibration impacts and geology and soils impacts. No significant and unavoidable adverse environmental effects to human beings would occur as a result of the proposed Project.

#### ***Additional Project-Level Mitigation Measures***

No additional mitigation beyond that presented in the respective sections of this IS is required.

**Level of Significance**

The proposed Project would have a less than significant impact related to environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

**Fish and Wildlife Determination**

Based on consultation with the California Department of Fish and Wildlife, there is no evidence that the Project has a potential for a change that would adversely affect wildlife resources or the habitat upon which the wildlife depends.

☐ Yes (No Effect)

☒ No (Pay fee)

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