

4TH ADDENDUM
FINAL ENVIRONMENTAL IMPACT REPORT
MARTIN LUTHER KING, JR. MEDICAL CENTER CAMPUS
REDEVELOPMENT
(SCH No. 2010031040)

TIER II PROJECT: BEHAVIORAL HEALTH CENTER
(MACC RENOVATION AND HAWKINS BUILDING DEMOLITION)

Prepared for

County of Los Angeles

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1. INTRODUCTION

In this Addendum references to the “project site” refer to the entire MLK Medical Center Campus (MLK Campus). The project site includes the Behavioral Health Center (BHC) site that is comprised of 1) the site of the original Multi-Service Ambulatory Care Center (referred to herein as the original MACC since the functions of this original building have been transferred to a new MACC), and 2) the site of the Augustus F. Hawkins Comprehensive Mental Health Center and adjacent landscaping/gardens (referred to herein collectively as the Hawkins Building).

A. Purpose of this Addendum

The purpose of this 4th Addendum to the 2011 Martin Luther King, Jr. (MLK) Medical Center Campus Redevelopment Final Environmental Impact Report (2011 FEIR) is to evaluate the environmental effects associated with the proposed the Behavioral Health Center (BHC) that would include 1) renovation and re-occupation of the original MACC and 2) demolition of the Hawkins Building and replacement with gardens and surface parking (280 spaces).

The 1st Addendum addressed the effects of the East Campus Parking Structure, the 2nd Addendum addressed the effects of the proposed Child Care Center in the Claude Hudson Auditorium and the 3rd Addendum addressed impacts of a 52,000 square foot medical office building at the northeast corner of the MLK Campus.

On October 11, 2011 the County of Los Angeles certified the 2011 FEIR, approved the Tier I project (Tier I MLK Project) and conceptually approved the Tier II MLK Medical Center Campus Redevelopment Project (Tier II MLK Project). The 2011 FEIR evaluated vacation of the original MACC as part of Tier I (as well as maintenance of a number of buildings, provision of space to accommodate the MACC program in a new building and other improvements); the 2011 FEIR programmatically addressed reuse or replacement of the original MACC and Hawkins Building as part of Tier II development on the campus. The 2011 FEIR analyzed an envelope of potential development on the MLK Campus (the development envelope is comprised of: maximum square feet of occupied space, maximum demolition of existing structures, maximum height of new structures, minimum setbacks, depth of excavation, and assumptions with respect to daily construction activity). The maximum square footage at build out for Tier II was identified as 1,814,696 square feet, an increase of 1,476,010 compared to existing conditions identified in the 2011 FEIR. Parking area is not included in developed area as it is not occupied building area and does not generate trips. The 2011 FEIR indicated that development would include a mix of uses, “including medical office, commercial, retail, office space, recreation, and other development in support of the campus.”

The 2011 FEIR indicated that of the 38 acres (1.3 million square feet) of land on the MLK Medical Center Campus, a minimum of 10% was reserved for open space and a maximum of 40% was reserved for up to 100 residential units, walkways and parking structures and/or lots with the remainder occupied by medical center buildings.

As part of the approval of the MLK Medical Center Campus Redevelopment Project (Tier I and conceptual approval of Tier II), the Board of Supervisors adopted Findings of Fact that identified the potential impacts, mitigation measures and alternatives associated with Tier I and Tier II of the MLK Medical Center Campus Redevelopment Project. The Findings of Fact identify four significant unavoidable adverse impacts: Air Quality (construction and operation) for Tier II, Cultural Resources (historic resources – removal of all significant buildings and impact to an

historic district) for Tier II, Greenhouse Gas Emissions for Tier I and Tier II and Noise (construction) for Tier I and Tier II. The Board of Supervisors also adopted a Statement of Overriding Considerations for these four significant and unavoidable impacts that outlined the benefits of the MLK Medical Center Campus Redevelopment Project including social and community benefits, economic benefits (jobs and business development), educational opportunities, sustainability of the facilities, provision for needed health care services. Specifically with respect to impacts to historic resources, the Statement of Overriding indicates that, “[t]he cultural resources significant impacts are overridden by the project’s ability to provide new campus improvements and to reopen a fully functional medical campus that meets the community needs for quality health care and establishes the Martin Luther King, Jr. Medical Center Campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce development, academic research and teaching, and economic development.

On January 15, 2013 the County of Los Angeles Board of Supervisors adopted a Master Plan for the MLK Medical Center (2013 Master Plan). The 2013 Master Plan included complete removal of the original MACC as well as the Hawkins Building. The Board of Supervisors approved a finding that the Master Plan was within the scope of the conceptually approved MLK Medical Center Redevelopment (Tier II) Project that was specified in and considered in the 2011 FEIR. In taking the action to approve the Master Plan the County indicated that the Master Plan will serve as a guideline for future development and that before specific projects are approved the Chief Executive Officer will recommend to the Board of Supervisors any further necessary environmental findings and determine whether any additional project-level mitigation is required under the California Environmental Quality Act (CEQA).

The first Tier II project was renovation of three floors of the Interns and Physicians Building as a recuperative care facility completed in 2015; a Categorical Exemption was prepared.

The second Tier II project was the East Campus Parking Structure. The East Campus Parking Structure was approved and 1st Addendum to the 2011 FEIR adopted January 5, 2016. The East Campus Parking Structure is currently under construction.

The third Tier II project, was the Child Care Center, with approximately 9,200 square feet, reusing portions of the Hudson Auditorium. The original Hudson Auditorium was 3,910 square feet. The Child Care Center was approved and 2nd Addendum to the 2011 FEIR adopted January 31, 2017. Construction began in August 2017 and is anticipated to be completed in September 2018, with occupancy in October 2018.

A fourth Tier II project, a 52,000 square foot medical office building (MOB) was approved for the northeast corner of the MLK Campus (southwest corner of Wilmington Avenue and 120th Street), and an addendum adopted by the Board of Supervisors September 26, 2017. Construction is anticipated to start in August 2018 and completed in December 2019 with occupancy anticipated in Spring 2020.

The County is now proposing to develop a mental health facility known as the Behavioral Health Center (BHC). The BHC would entail 1) renovation of the original MACC and 2) demolition of the Hawkins Building and replacement with gardens and surface parking. The BHC would include inpatient and outpatient services for a variety of mental health programs. Renovation of the original MACC (identified as one of five historical resources on the MLK Campus) would result in fewer impacts (as a result of less construction and retention of an historical building) as compared to potential demolition of the original MACC that was contemplated in the 2011 FEIR

(both demolition and retention of the original MACC were evaluated in the 2011 FEIR) and the 2013 Master Plan. The Hawkins Building is now proposed for demolition. The original concept identified in the 2011 FEIR did not anticipate demolition of the Hawkins Building, although in order to provide a conservative analysis, demolition of the Hawkins Building was addressed, and mitigation identified. The 2011 FEIR considered impacts and identified mitigation for the worst-case condition of removal of all five historic resources on the MLK Campus (four buildings and the associated MLK Campus Historic District).

The proposed BHC (including renovation and re-occupation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) would be within the assumptions analyzed in the 2011 FEIR (see Sections 2 and 3 of this Addendum for detailed descriptions and analyses by issue area) and would be consistent with the evaluation presented in the prior Addendums to the 2011 FEIR. To comply with CEQA (Public Resources Code Sections 21000 et seq.) and State CEQA Guidelines (California Code of Regulations Sections 15000 et seq., also referred to as Guidelines), this Addendum to the certified 2011 FEIR has been prepared to evaluate impacts from development of the proposed BHC (including renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking).

B. CEQA Requirements

An Addendum to an EIR is the appropriate tool to evaluate the environmental effects associated with *minor modifications* to previously approved projects. It is appropriate when modifications would not result in new or increased significant adverse impacts.

According to Section 15164(a) of the CEQA Guidelines, “the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” An addendum may be prepared if only minor technical changes or additions are necessary. A brief explanation of the decision not to prepare a subsequent EIR must also be provided in the addendum, findings or the public record.

Section 15162 of the Guidelines lists the conditions that would require the preparation of a subsequent EIR or negative declaration rather than an addendum. These include the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

-
- A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternative; or
 - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Unlike a subsequent EIR, per Section 15162, a supplement to an EIR may be prepared per Section 15163 under the following conditions.

- (a) The Lead or Responsible Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:
 - (1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
 - (2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

A supplement to an EIR may be distinguished from a subsequent EIR by the following: a supplement augments a previously certified EIR to the extent necessary to address the conditions described in section 15162 and to examine mitigation and project alternatives accordingly. It is intended to revise the previous EIR through supplementation. A subsequent EIR, in contrast, is a complete EIR, which focuses on the conditions described in section 15162.

The proposed the BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) is described in Section 2 of this Addendum and would be within the assumptions for construction and operation analyzed in the 2011 FEIR. The proposed BHC has been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the Guidelines. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified MLK Campus Redevelopment Project 2011 Final EIR is the appropriate environmental documentation under CEQA for the proposed BHC.

Section 3 discusses issue-by-issue how the impacts anticipated for the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) would be within those previously identified in the 2011 FEIR. The Mitigation Monitoring and Reporting Program (MMRP) adopted with the 2011 FEIR would continue to apply to the proposed BHC to ensure that all significant impacts remain less than significant where feasible.

C. Mitigation Measures

The 2011 FEIR identified the mitigation measures shown in **Table 1** as applicable to Tier II projects. These mitigation measures were previously adopted by the Board of Supervisors along with certification of the FEIR on October 11, 2011.

As a result of LACDPW experience working on the MLK Campus one of the historic mitigation measures is proposed to be refined in order to clarify the measure and reflect current practices on the MLK Campus. Revisions to the measure are shown below (added text is shown as underlined and deleted text is shown in ~~strikeout font~~):

Measure Cultural-4, Historical Resources. Tier II impacts resulting from demolition or substantial alteration of significant historical resources not in conformance with the Secretary of the Interior's Standards shall be reduced to the maximum extent feasible through archival documentation of as-found condition. Prior to the initiation of construction activities, the County of Los Angeles shall ensure that documentation of the Martin Luther King, Jr. Medical Center Campus Historic District, Multi-Service Ambulatory Care Center (MACC), Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and/or Dr. H. Claude Hudson Auditorium is completed ~~in accordance with Historic American Buildings Survey (HABS) requirements for donated material~~. The documentation shall be in the form of a Historic American Building Survey and shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The documentation shall include archival and other appropriate supplementary large-format ~~measured~~ photographic recordation, detailed historic narrative report, architectural drawings, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The original archival-quality documentation shall be provided to the LA Public Library ~~offered as donated material to Historic American Building Survey for inclusion in the Library of Congress~~. Archival copies of the documentation shall be made available on-line and also ~~would be available for review~~ at the Martin Luther King, Jr. Medical Center campus and maintained by the County of Los Angeles.

These refinements are reflected in Table 1. The refined Mitigation Measure Cultural-4 would replace the previous language and would apply to all MLK Campus projects that have the potential to impact historic buildings or appurtenant elements.

These refinements to Measure Cultural-4 would not change the effectiveness of the measure or change the level of significance after mitigation. The refinements would clarify the measure and would provide equivalent mitigation.

The proposed refinements to Measure Cultural-4 have been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the Guidelines and the County has determined that none of the conditions apply that would require preparation of a subsequent or supplemental EIR and that an Addendum is the appropriate environmental documentation under CEQA to document these changes.

**TABLE 1
MITIGATION MEASURES**

Aesthetics

Measure Aesthetics-1. All exterior lighting for building and on-site security lighting shall be shielded and directed downwards to minimize the impacts on the surrounding land uses. New development shall not include large expanses of reflective or otherwise glare-producing surfaces (such as windows or walls) on the facade. Additionally, any glazed north-facing facade shall be set over 200 feet from the street in order to ensure that it would not be subject to direct sunlight except very early and late in the day for a few winter days.

Measure Aesthetics-2. The County of Los Angeles shall review all plans for the Tier II development. Contractors shall conform with all design features described in the Campus Planning and Programming Report, which is intended to serve as a guide for development at the project site to ensure visual consistency and continuity at the project site and within the surrounding area.

Measure Aesthetics-3. All development shall be limited to three stories in height if the structure would be located along the western or eastern edge of the property. The existing setback includes the pediatric modular building/oasis clinic located approximately 14 feet from the property line along the eastern boundary at Wilmington Avenue, Interns and Physicians Building at approximately 20 feet from property line along the western boundary at Compton Avenue, the Hawkins Building located at approximately 30 feet from property line along the northern boundary at 120th Street, and the Cooling Tower located at 44 feet from the property line along the south. Alternatively, if a structure would exceed three stories in height along the perimeter of the property (western or eastern perimeter only), at a minimum, the County of Los Angeles shall ensure that the building would be required stay within the approximately 20-foot and 14-foot existing campus respective western and eastern boundary setbacks to reduce shade and shadow impacts to adjacent land uses along Compton Avenue and Wilmington Avenue.

Measure Aesthetics-4. Where parking lots or structures are adjacent to residential areas or near other sensitive light receptors along the southern portion of the campus, Compton Avenue, and Wilmington Avenue, retaining walls and/or landscaping of sufficient height shall be incorporated into the design of the proposed project to shield vehicle headlights (which typically sit at a minimum of 3 feet in height above ground). These project features shall be included in the landscape plans and final project design plans (to avoid and reduce potential light and glare obstructions that could impact residential areas).

Air Quality

Measure Air-1. Water or a stabilizing agent shall be applied during Tier I to exposed surfaces in sufficient quantity to prevent generation of dust plumes. Soil moistening shall be required to treat exposed soil during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. Prior to advertising for construction bids for each element, the plans and specifications shall be reviewed by the County of Los Angeles to ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that soil shall be moistened not more than 15 minutes prior to the daily commencement of soil-moving activities and three times a day, or four times a day under windy conditions (when winds exceed 25 miles per hour as instantaneous gusts), in order to maintain a soil moisture content of 12 percent, as determined by American Society for Testing and Materials method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency. The construction contractor shall demonstrate compliance with this measure through the submission of weekly monitoring reports to the County of Los Angeles. At a minimum, active operations shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type that is part of the active operation. The County of Los Angeles shall also ensure that the plans and specifications for each element of the project include a requirement for ground cover to be replaced in disturbed areas as quickly as practicable and that the County of Los Angeles appoints a construction relations officer to act as a community liaison concerning on-site construction activity including addressing issues related to fugitive dust generation.

Measure Air-2. Moistening or covering of excavated soil piles shall be required during Tier II to treat grading areas during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that excavated soil piles are watered hourly for the duration of construction or covered with temporary coverings.

Measure Air-3. Discontinuing Tier II construction activities that occur on unpaved surfaces during windy conditions (when winds exceed 25 miles per hour as instantaneous gusts) shall be discontinued to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in

**TABLE 1
MITIGATION MEASURES**

critical pollutants. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cease construction activities that occur on unpaved surfaces during periods when winds exceed 25 miles per hour as instantaneous gusts.

Measure Air-4. Track-out during Tier II shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday. Track-out is defined by the South Coast Air Quality Management District as any bulk material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that have been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure that the track-out shall not extend 25 feet or more from an active operation and that it would be removed at the conclusion of each workday. Street sweepers should also comply with SCAQMD Rules 1186 and 1186.1 and use reclaimed water, if available.

Measure Air-5. A wheel washing system shall be installed during Tier II, and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site. Washing of wheels leaving the construction site during construction of each element shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. The County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to clean adjacent streets of tracked dirt at the end of each workday or install on-site wheel-washing facilities.

Measure Air-6. All haul trucks hauling soil, sand, and other loose materials during Tier II shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions). All transport of soils to and from the project site for each element shall be conducted in a manner that avoids fugitive dust emissions and ensures compliance with current air quality standards. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cover all loads of dirt leaving the site or to leave sufficient freeboard capacity in the truck to prevent fugitive dust emissions en route to the disposal site.

Measure Air-7. Traffic speeds on unpaved roads during Tier II shall be limited to 15 miles per hour. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure a traffic speed limited to 15 miles per hour.

Measure Air-8. Heavy-equipment Tier II operations shall be suspended during first- and second-stage smog alerts. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure heavy-equipment operations be suspended during first- and second-stage smog alerts.

Measure Air-9. All equipment shall be turned off when not in use. Engine idling of all equipment used during both construction and operation/maintenance shall be minimized and/or limited to no more than five minutes in accordance with state law. All equipment engines shall be maintained in good operating condition and in proposed tune per manufacturers' specification. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure the construction equipment meet the aforementioned criteria. All on-site construction equipment shall be required to meet U.S. EPA Tier 2 or higher emissions standards according to the following:

- April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve

**TABLE 1
MITIGATION MEASURES**

emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

Measure Air-10. Wherever possible, contractors shall use materials that do not require painting or use pre-painted materials. In order to minimize emissions of volatile organic compounds, contractors shall use high-pressure, low-volume paint applicators with a minimum transfer efficiency of at least 50 percent and coatings and solvents with a volatile organic compound content lower than required under South Coast Air Quality Management District Rule 1113, Architectural Coatings:

- Clear wood finishes: 275 grams/liter
- Floor coatings: 50 grams/liter
- Sealers: waterproofing sealers 100 grams/liter; sanding sealers 275 grams/liter; all other sealers 100 grams/liter • Shellacs: Clear 730 grams/liter; pigmented 550 grams/liter
- Stains: 100 grams/liter

Measure Air-11. The following measures shall be implemented, wherever feasible, to reduce operational air quality impacts:

- Improve traffic flow by signal synchronization
- Ensure County-owned campus vehicles use clean fuels such as compressed natural gas and that shuttle buses for the campus are "clean" buses, such as 2010 compliant vehicles
- Require all County of Los Angeles and County of Los Angeles contractor vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications
- Provide services that promote ridesharing and vanpools
- Provide charging stations or preferred parking for alternative technology vehicles • Provide preferred parking for carpools and vanpools
- Reduce energy consumption by providing alternative energy sources on site and installing energy-efficient appliances

Cultural Resources

Measure Cultural-1, Paleontological Resources. The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation of unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located 15 or more feet below the ground surface that would have the potential to contact extant older Quaternary Alluvium. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, the County of Los Angeles shall require and be responsible for salvage and recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology:

- Paleontological Resources Sensitivity Training is required for all project personnel prior to the start of ground-disturbing activities. This brief (approximately 15 minute) field training reviews what fossils are, what fossils might potentially be found, and the appropriate procedures to follow if fossils are found.
- Prior to any ground-disturbing activities, the County of Los Angeles shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.
- A qualified paleontologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain unique paleontological resources.
- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.
- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.
- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered; fossil specimens recovered, and associated specimen data.
- All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their

**TABLE 1
MITIGATION MEASURES**

placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the County of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the County of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources.

Measure Cultural-2, Human Remains. Although the discovery of human remains is not anticipated during ground-disturbing activities for the proposed project, a process has been delineated for addressing the unanticipated discovery of human remains:

- Unanticipated Discovery of Human Remains (Public Resources Code 5097). The Los Angeles County Coroner shall be notified within 24 hours of the discovery of human remains. Upon discovery of human remains, there shall be no further excavation or disturbance of the site or any of that area reasonably suspected to overlie adjacent human remains until the following conditions are met:
 - The Los Angeles County Coroner has determined that no investigation of the cause of death is required, and
 - Whenever the Native American Heritage Commission receives notification of a discovery of Native American human remains from the Los Angeles County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. If the remains are of Native American origin, the descendants from the deceased Native Americans shall complete their inspection and make recommendations or preferences in writing to the landowner or the person responsible for the excavation work, for treatment or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

Measure Cultural-3, Historical Resources. Potentially significant adverse impacts to historical resources have been identified in relation to five historical resources as a result of implementation of the Tier II project: the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium. Three mitigation measures have been identified in association with Tier II to reduce impacts to the maximum extent practicable. In the event that the five historical resources are not removed or otherwise impacted through significant modifications or alterations to the character-defining features of these resources, this impact would be less than significant and would not require mitigation. Tier II impacts to four significant historical resources (Multi-Service Ambulatory Care Center [MACC], Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium) and the integrity of the Martin Luther King, Jr. Medical Center Campus Historic District (a fifth historic resource) shall be reduced to below the level of significance through utilization of the Secretary of the Interior's Standards for the treatment of Historic Properties with Guidelines of Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings for any proposed alterations, including all site work, structural upgrades, architectural, and mechanical systems improvements and repairs. The work shall conform to the standards and guidelines for "rehabilitation." Conformance with the Secretary of the Interior's Standards shall be monitored by an architectural historian or historic architect who meets the Secretary of the Interior's Professional Qualification Standards. Completion of this mitigation measure shall be monitored and enforced by the County of Los Angeles.

Measure Cultural-4, Historical Resources. Tier II impacts resulting from demolition or substantial alteration of significant historical resources not in conformance with the Secretary of the Interior's Standards shall be reduced to the maximum extent feasible through archival documentation of as-found condition. Prior to the initiation of construction activities, the County of Los Angeles shall ensure that documentation of the Martin Luther King, Jr. Medical Center Campus Historic District, Multi-Service Ambulatory Care Center (MACC), Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and/or Dr. H. Claude Hudson Auditorium is completed. The documentation shall be in the form of a Historic American Building Survey and shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The documentation shall include archival and other appropriate photographic recordation, detailed historic narrative report, measured architectural drawings, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The original archival-quality documentation shall be provided to the LA Public Library. Archival copies of the documentation shall be made available on-line and be available for review at the

**TABLE 1
MITIGATION MEASURES**

Martin Luther King, Jr. Medical Center campus and maintained by the County of Los Angeles.

Measure Cultural-5, Historical Resources. Impacts resulting from the loss of integrity of the Martin Luther King, Jr. Medical Center Campus Historic District such that its significance is materially impaired will be reduced to the maximum extent feasible through the development of a retrospective exhibit detailing the history of the Martin Luther King, Jr. Medical Center Campus Historic District, its significance, and its important details and features. The retrospective exhibit shall be in the form of a physical exhibit installed on the Martin Luther King, Jr. Medical Center Campus, which is located either within a building or on a freestanding kiosk or comparable structure or installation on the property. The exhibit should commemorate the historic appearance of the district and provide the public with sufficient information to understand its historic significance. The exhibit shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The exhibit should be completed within a period of no more than two years from the date of completion of Tier II of the proposed project.

Geology and Soils

Measure Geology-1. The construction contractor shall incorporate best management practices consistent with the guidelines provided in the California Storm Water Best Management Practice Handbooks: Construction. As discussed in the Geotechnical Investigation that was prepared for the project site, earthwork at the project site should be performed in conformance with the Los Angeles County Building Code and other guidelines provided in the geotechnical study, and under the observation and testing of a geotechnical engineer, in order to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills.

Measure Geology-2. Due to seismic compliance standards established by the Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or as required, the construction contractor shall incorporate project design elements consistent with Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or required standards, and thus further reduce any potential for impacts resulting from unstable geologic units and soils. The County of Los Angeles shall conform to measures described in the project geotechnical study(ies) to ensure compliance throughout the construction and development of the project.

Measure Geology-3. A geotechnical engineer shall be present on site for observation of earth-moving activities (such as site preparation, excavation) to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. Any unanticipated adverse conditions encountered shall be evaluated by the project engineering geologist and the soil engineer.

Greenhouse Gases

Measure Greenhouse Gases-1. Prior to construction of the proposed project, the final design plan and schemes for Tier II shall be reviewed to ensure that the County of Los Angeles conforms to its commitments pursuant to the California Climate Action Registry and the greenhouse gas emissions reduction targets established in Assembly Bill 32 are dependent on the incorporation of this mitigation measure, which is based on seven (7) of the sustainable design strategies or comparable measures recommended by the California Office of Attorney General to reduce carbon dioxide (CO₂) emissions per capita:

- Design buildings to be energy efficient. Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use
- Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings
- Create water-efficient landscapes
- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on site can drastically reduce the need for energy-intensive imported water at the site.)
- Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods
- Incorporate provisions for future public transit into project design
- Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio

The review shall further ensure that all applicable sustainable design measures or comparable measures have been incorporated into the final project design.

Hazards and Hazardous Materials

**TABLE 1
MITIGATION MEASURES**

Measure Hazards-1. To reduce surface water quality impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. A Spill Prevention Control and Countermeasures Plan shall be developed as a part of these requirements to address the handling of petroleum or other hazardous materials during refueling, operations and maintenance and other construction-related activities. The agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Measure Hazards-2. To avoid exposure to asbestos-containing materials and lead-based paints during demolition, construction, and remediation activities, the County of Los Angeles and the Office of Statewide Health Planning and Development shall require that all such materials and wastes be identified and an Operations and Maintenance Plan developed prior to the issuance of demolition permits for each structure constructed prior to 1979. The Operations and Maintenance Plan shall ensure compliance with all applicable federal, state, and local requirements and specify all work to be done, including lead and asbestos surveys of structures to be demolished, proper handling and storage of lubricants and fuels for construction equipment, and methods for remediation of asbestos-containing materials and lead-based paints, if necessary. The Operations and Maintenance Plan shall be submitted to the County of Los Angeles Department of Health Services for review and approval prior to initiation of construction and demolition activities for the MACC building, emergency room, storage building or the cooling towers. The Operations and Maintenance Plan shall, as appropriate and necessary, conform to the requirements of the Los Angeles County Department of Health Services (Local Enforcement Agency), South Coast Air Quality Management District, the Los Angeles Regional Water Quality Control Board, and the Department of Toxic Substances Control. Compliance with the Operations and Maintenance Plan shall be monitored by the County of Los Angeles Regional Planning Department throughout construction and demolition.

To reduce impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. These agencies shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Measure Hazards-3. Prior to the issuance of grading permits for development, the County of Los Angeles shall ensure that a Soil Management Plan is prepared for the project site and that the Office of Statewide Health Planning and Development reviews the grading plans to ensure that the construction contractor is required to stop work and notify the Certified Unified Program Agency of the unanticipated encounter of underground storage tanks during grading activities. In the event that any leaking underground storage tanks are located or encountered, the County of Los Angeles Department of Public Works shall be notified and the underground storage tank shall be remediated in accordance with County of Los Angeles guidelines and consistent with specifications of the Department of Toxic Substances Control and other relevant standards. The County of Los Angeles Fire Department Health Hazardous Materials Division shall be notified of all other contaminated soils encountered during construction-related site activities.

Measure Hazards-4. To avoid exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon-contaminated soils during routine transport and disposal for both the construction phase and operational phase of the project, the County of Los Angeles shall require that the construction contractor store, use, and transport all hazardous materials in compliance with all relevant regulations and guidelines. The routine transport of hazardous materials to and from the Martin Luther King, Jr. Medical Center Campus during construction and operation of the elements of the project shall be accomplished via Wilmington Avenue, Compton Avenue, and 119th Street. Compliance shall be determined by monitoring by regulatory agencies. Transport, storage, and handling of construction-related hazardous materials shall be consistent with the guidelines provided by the California Department of Transportation, Los Angeles Regional Water Quality Control Board, the South Coast Air Quality Management District, and the Certified Unified Program Agency. Each agency shall regulate and enforce, through permitting and record keeping, the monitoring and enforcement of this mitigation measure.

Measure Hazards-5. At least 30 days prior to approval of Tier II final plans and specifications for development, the Office of Statewide Health Planning and Development shall review and provide comments on the plans and specifications to ensure compliance with all requirements of the Department of Toxic Substances Control and in order to verify that the site remains unlisted on the Hazardous Materials and Substance Sites List maintained by the

**TABLE 1
MITIGATION MEASURES**

California Environmental Protection Agency, Department of Toxic Substances Control.

Hydrology and Water Quality

Measure Hydro-1. The County of Los Angeles shall ensure that the construction, landscape features, and site grading for Tier II of the project comply with standard best management practices set forth by the Regional Water Quality Control Board. Prior to final plans and specifications for all elements of the project, the County of Los Angeles shall review the plans and specifications for all elements to ensure that the plans and specifications require the construction contractor to prepare a Standard Urban Stormwater Mitigation Plan for construction activities and implement best management practices for construction, materials, and waste handling activities, which will include, but not be limited to:

- Scheduling excavation, grading, and paving activities for dry weather periods.
- Controlling the amount of runoff crossing the construction site by means of berms and drainage ditches to divert water flow around the site.
- Identifying potential pollution sources from materials and wastes that will be used, stored, or disposed of on the site.
- Informing contractors and subcontractors about the clean storm water requirements and enforce their responsibilities in pollution prevention through a contractual agreement
- Sweeping the streets surrounding the proposed project site daily and trash removal throughout the construction of the project to avoid degradation of water quality.

Measure Hydro-2. The construction contractor shall incorporate Standard Urban Stormwater Mitigation Plan requirements and best management practices to mitigate storm water runoff, which include the following:

- The incorporation of bio-retention facilities located within the project area
- The incorporation of catch basin filtration systems
- The use of porous pavements to reduce runoff volume

Measure Hydro-3. In the event that groundwater is encountered during Tier I construction, the County of Los Angeles shall require the construction contractor complete the dewatering operations in accordance with the established National Pollution Discharge Elimination System permit requirements.

Measure Hydro-4. To ensure that operational impacts associated with Tier II remain below the level of significance, the County of Los Angeles shall require that best management practices and sustainable practices, such as regularly removing vegetation and debris from curbs, catch basins, and outlets; limiting the amount of pesticides and fertilizers used in landscaping, and other best management practice as recommended by the Environmental Protection Agency or in the California Stormwater Best Management Practice Handbooks as ongoing maintenance measures, are implemented into a maintenance plan for the campus.

Noise

Measure Noise-1. The County of Los Angeles shall require that the plans and specifications require that construction equipment be equipped with state-of-the-art noise-muffling devices. Barriers or curtains shall be required to be installed close to equipment to shield the equipment from the receptor. Barriers or curtains utilized at the project site shall be required to reduce A-weighted construction noise levels at nearby sensitive receptors by a minimum of 10 decibels (dB) or to the maximum extent possible. The height and length of the barriers or curtains shall be determined based on the location of the construction activity and receptor. Because of the close proximity of the source and receptors, the noise impact would be dependent on the location of the noise sources. Prior to the start of demolition and construction, the contractor shall develop a noise control plan based on the actual equipment that will be used during demolition and construction, and the location of various demolition and construction activities. If the actual equipment noise levels are not available, equipment noises shall be measured in the field. The noise control plan shall predict the noise levels with actual equipment and with barriers or curtains in place. In addition, the plan shall take into account the demolition and equipment mix that would be operated at the same time. Equipment mix and/or the number of equipment operating shall be considered in reducing the noise levels.

Measure Noise-2. Prior to the completion of final plans and specifications, the County of Los Angeles shall ensure that the plans and specifications include a requirement that all demolition and construction equipment be properly maintained. All vehicles and compressors shall utilize exhaust mufflers. Engine enclosure covers as designed by the manufacturer shall be in place at all times. The County of Los Angeles shall monitor the use of heavy equipment during all demolition and construction activities to ensure conformance with the requirements of properly maintained heavy equipment.

Measure Noise-3. The distance at which impact pile driving would not exceed a peak particle velocity of 0.2 inch per

**TABLE 1
MITIGATION MEASURES**

second at a residence would be 55 feet. Therefore, the County of Los Angeles shall require that impact pile driving not be utilized within 55 feet of a residential structure. Should pile driving be necessary within 55 feet of a residence, sonic pile driving shall be utilized.

Measure Noise-4. The County of Los Angeles shall ensure that mechanical noise generated by the project is less than 45 A-weighted decibels (dBA) at residences immediately south (approximately 50 feet) of the project. This shall be achieved by implementing one, or a combination of more than one of the following strategies: utilizing quiet mechanical systems; locating mechanical systems away from residences (mechanical systems that produce a noise level of 55 dBA at 50 feet would need to be located a minimum of 160 feet from residences to bring mechanical noise levels below 45 dBA at residences), or utilizing insulating screens to break the line-of-site between the mechanical systems and nearby residences

Traffic

Measure Traffic-1. To reduce the traffic-related construction impacts, the County of Los Angeles shall require the construction contractor to provide a Construction Traffic Management Plan that is prepared in accordance with the California Department of Transportation's Construction Manual and Manual on Uniform Traffic Control Devices. The Construction Traffic Management Plan shall at the minimum address:

- Timing of deliveries of heavy equipment and building materials
- Directing construction traffic with a flag person
- Placing temporary signing, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic
- Identifying if improvements to the intersection of 120th Street, Wilmington Avenue, or Compton Avenue are necessary to accommodate the turning radii needed by large trucks accessing site Identifying multiple alternate ingress/egress access point for the circulation of traffic and emergency response vehicles
- Determining the need for construction work hours and arrival/departure times outside peak traffic periods
- Ensuring access for emergency vehicles to the project site
- Temporary closure of travel lanes or disruptions to street segments and intersections during materials delivery, transmission line stringing activities, or any other utility connections
- Maintaining access to adjacent property
- Specification of both construction-related vehicle travel and oversize load haul routes, the minimization of construction traffic during the AM and PM peak hour, distributing construction traffic flow across alternative routes to access the proposed project site, and avoiding residential neighborhoods to the maximum extent feasible
- Identification of vehicle safety procedures for entering and exiting site access roads

Measure Traffic-2. In order to address the Tier II project impacts, the County of Los Angeles shall complete the following improvements:

- Compton Avenue / Imperial Highway, County of Los Angeles / City of Los Angeles: Re-stripe westbound approach to provide a separate right-turn lane.
- I-105 / Imperial Highway: Provide a third northbound, left-turn lane by widening off-ramp by 10 feet for approximately 150 to 200 feet.
- Wilmington Avenue / El Segundo Boulevard: Re-stripe eastbound and westbound approaches to have separate right-turn lanes. Allow buses to go through the intersection from the right-turn lanes.
To be completed as part of East Campus Parking Structure.
- Central Avenue / 120th Street: Re-stripe northbound approach to provide a separate right-turn lane. Also, widen the east leg by 3 feet on each curbside (i.e., reduce sidewalk along 120th Street east of Central Avenue by 3 feet for approximately 120 feet and re-stripe westbound 120th Street approach to provide a left-turn, two through lanes and a separate right-turn lane.
- Wilmington Avenue / I-105 Eastbound Ramps, County of Los Angeles / California Department of Transportation: Provide an additional eastbound lane by widening (reducing the raised median on the ramp) the off-ramp. The eastbound approach shall have a left-turn lane, shared left-right turn lane, and a separate right-turn lane. The sidewalks on both sides of Wilmington Avenue (as noted above) shall be reduced by 2 feet and the Wilmington Avenue roadway shall be widened by 2 feet on both sides (a total of 4 feet) from the south leg of this intersection. Provide an additional northbound left-turn lane by widening (reducing the medians).
- Wilmington Avenue / 118th Street, County of Los Angeles: Widen Wilmington Avenue roadway by 2 feet on both sides and re-stripe to provide two through lanes, a shared through right-turn lane and dual left-turn lanes along the southbound approach. Re-stripe the westbound approach to provide a separate right-turn lane and a shared left-through lane. Northbound approach shall have the same lane geometry as existing

**TABLE 1
MITIGATION MEASURES**

conditions. Under cumulative conditions, widen 118th Street roadway by 4 feet and re-stripe to provide a separate right-turn lane and shared left-through lane along the eastbound approach.

- Wilmington Avenue / 120th Street–119th Street, County of Los Angeles: Widen Wilmington Avenue roadway by 2 feet on both sides and restripe the southbound approach to provide a separate right-turn lane, three through lanes, and a left-turn lane. Re-stripe northbound approach to provide a shared through-right turn lane, two through lanes, and a left-turn lane. Remove median adjacent to northbound approach to facilitate three southbound receiving lanes. Restrict parking along Wilmington Avenue roadway during morning and evening peak periods along the eastside of Wilmington between 120th Street and Martin Luther King, Jr. Hospital Driveway entrance. Widen 120th Street west of Wilmington Avenue for 250 feet, on the south side by 2 feet, and re-stripe the eastbound approach to provide a separate right-turn lane, dual left-turn lanes, and a through lane. The westbound approach of 119th Street would have the same lane geometry as existing conditions.

As partial implementation of the above measure to address impacts of the East Campus Parking Structure, the northbound approach to the intersection is to be re-stripped to provide two northbound through lanes and one dedicated right-turn lane (on-street parking for 100 to 150 feet south of the intersection to be removed, approximately seven spaces).

- Wilmington Avenue / Martin Luther King, Jr. Hospital Entrance–120th Street, County of Los Angeles: Re-stripe southbound approach to provide a separate right-turn lane, two through lanes, and a left-turn lane. Provide three northbound receiving lanes and restrict on-street curb parking along the eastside of Wilmington Avenue between Martin Luther King, Jr. Hospital Driveway and 120th Street and 120th Street and 119th Street during morning and evening peak hours.
- Remove the median within the hospital entrance and re-stripe the driveway to provide dual left-turn lanes, a through lane, and a separate right-turn lane along the eastbound approach. Re-stripe to provide one receiving lane.

As partial implementation of this measure to address impacts of the East Campus Parking Structure only, the addition of a left turn lane to the existing (eastbound) driveway configuration, creating a three-lane approach to Wilmington Avenue. As the new eastbound approach would include overlapping left turn lanes, the east-west signal phasing to be modified to operate as separate split phases. This requires modification of the traffic signal, possibly including upgrades of signal mast arms for those two approaches.

The appropriate conceptual signing and striping plans shall be submitted to the County of Los Angeles Department of Public Works, Traffic and Lighting Division for review and approval during the planning phase.

Measure Traffic-3. In order to address the Tier II cumulative projects impacts, using County of Los Angeles traffic study guidelines, the following mitigation measures shall be implemented to alleviate the cumulative significant impacts:

- Avalon Boulevard / El Segundo Boulevard, County of Los Angeles: Widen northbound approach by 2 feet and re-stripe the approach to provide a left turn lane, two through lanes, and a separate right-turn lane (10 foot, 10 foot, 10 foot, 12 feet). The approach could be widened by narrowing the 5-foot-wide median to a 3-foot-wide median, or by reducing the 12-foot-wide sidewalk to a 10-foot-wide sidewalk. This widening would need to occur all the way to an alley located approximately 100 feet south of the intersection. The bus stop at this approach would continue to be located at the same location; however, buses would be allowed to go straight through the intersection.
- Alameda Street / El Segundo Boulevard, County of Los Angeles / Compton: Re-stripe northbound/southbound approaches and provide a southbound right-turn lane. The lanes along the north leg shall be re-stripped to provide 13-foot and 11-foot receiving lanes; 10-foot, 11-foot, 10-foot, and 12-foot approach lanes for southbound left-turn lane, southbound through lanes, and southbound right-turn lanes, respectively. The lanes along the south leg would have a 13-foot shared right through-way, 11-foot through lane, 10-foot left-turn lane, 12-foot receiving lane, and a 20-foot receiving lane. Remove two on-street parking spaces along the southbound approach during peak hours.
- Alameda Street / 103rd Street, County of Los Angeles / Lynwood: Re-stripe eastbound approach to provide a 10-foot, left-turn lane and a 12-foot, left-right shared lane. The receiving lane would be re-stripped for 18.5 feet.
- Central Avenue / Rosecrans Avenue, County of Los Angeles / Compton: Re-stripe westbound approach to provide a separate right-turn lane. Allow buses to go through the intersection from the right-turn lane.
- Central Avenue / El Segundo Boulevard, County of Los Angeles / Compton: Re-stripe southbound approach to provide a separate right-turn lane. Widen northbound approach by reducing median by 1 foot to 2 foot. Provide re-striping to show a separate northbound right-turn lane. Allow buses to go through the intersection from the right-turn lane.

**TABLE 1
MITIGATION MEASURES**

- Alameda Street / Imperial Highway, County of Los Angeles / City of Lynwood: Re-stripe southbound approach to provide the following roadway geometry: two left-turn lanes, two through lanes, and one right-turn lane.

The appropriate conceptual signing and striping plans shall be submitted to the County of Los Angeles Department of Public Works, Traffic and Lighting Division for review and approval during the planning phase.

Measure Traffic-4. Along the southbound approach of Alameda Street, the County of Los Angeles shall provide two left-turn lanes, two through lanes and one right-turn lane instead of one left-turn lane, two through lanes and a separate right-turn lane (i.e., add a second left turn lane). In addition, the County of Los Angeles shall provide the required signal hardware and supporting software to facilitate a right-turn arrow signal indication for southbound right-turn overlap with eastbound-westbound left-turns at the intersection.

Utilities

Measure Utilities-1. Prior to issuance of the permits to connect to the sewer system, the County of Los Angeles shall ensure payment of the connection fee for the capital facilities has been submitted to the appropriate Sanitation Districts of Los Angeles County for compliance with the California Health and Safety Code.

Measure Utilities-2. The County of Los Angeles shall review the plans and specifications for the project and the parking facilities to ensure that adequate service areas are provided for trash and recycling receptacles for compliance with applicable federal, state, and local statutes related to solid waste, and to reduce direct and cumulative impacts from project operation and maintenance to below the level of significance. Prior to advertising for construction bids for the new building, the County of Los Angeles shall ensure that the plans and specifications designating locations for trash receptacles and recycling receptacles are in conformance with the California Solid Waste Reuse and Recycling Access Act of 1991. Wherever trash receptacles are provided throughout the project site, a recycling receptacle for plastic, aluminum, and metal shall also be provided. Signs encouraging patrons to recycle shall be posted near each recycling receptacle.

To ensure conformance with the Solid Waste Management Act of 1989, the County of Los Angeles shall require the construction contractor to manage the solid waste generated during construction of each element of the project by diverting at least 50 percent of solid waste from disposal in landfills, particularly Class III landfills, through source reduction, reuse, and recycling of construction and demolition debris. The construction contractor shall submit a construction solid waste management plan to the County of Los Angeles for approval prior to initiation of demolition activities. The construction contractor shall demonstrate compliance with the solid waste management plan through the submission of monthly reports during construction and demolition activities that estimate total solid waste generated and diversion of 50 percent of the solid waste.

Notes: Measures Traffic-2, Traffic-3 and Traffic-4 to be implemented as required prior to any impacts occurring; these measures are not required to be implemented for the proposed BHC as trips generated (together with all other projects on the MLK Campus, would be less than existing conditions identified in the 2011 FEIR.

Each Tier II project is analyzed to determine when mitigation measures must be implemented in order to ensure that impacts are mitigated in accordance with the 2011 FEIR.

SOURCE: 2011 FEIR

D. Summary Comparison of Significant Impacts Identified in 2011 FEIR Compared to Impacts of Proposed Behavioral Health Center

Unavoidable significant adverse environmental impacts identified for the 2011 FEIR for Tier II projects as compared to impacts of the BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) are summarized in **Table 2** below:

TABLE 2
COMPARISON OF SIGNIFICANT IMPACTS
2011 FEIR COMPARED TO IMPACTS OF THE PROPOSED BEHAVIORAL HEALTH CENTER

Issue Area	2011 FEIR MLK Medical Center Campus Redevelopment Project	BHC
Air Quality	<p>Construction: Emissions would exceed regional daily thresholds for VOCs and NOx and localized thresholds for NOx, PM2.5 and PM10 -- based on assumed equipment use and distance to sensitive receptors.</p> <p>Operations: Emissions would exceed regional daily thresholds for VOCs, NOx, CO and PM10.</p> <p>Mitigation Measures Air-1 through Air-9 would reduce project and cumulative air quality impacts during construction to the maximum extent feasible.</p>	<p>Demolition of the Hawkins Building would not occur simultaneously with construction of the child care center and/or the medical office building. MACC renovation activities could overlap with some construction activities of the medical office building. Emissions associated with renovation of the original MACC and Hawkins Building demolition even overlapping with construction of the medical office building, would be within those analyzed in the 2011 FEIR. The 2011 FEIR assumed construction activities right up to the property line; construction activities associated with renovation of the original MACC and Hawkins Building demolition would be more than 60 feet from the property line and adjacent single-family sensitive receptors. Nonetheless air quality impacts to sensitive receptors could still be significant; however, they would be within the impacts analyzed in the 2011 FEIR. Impacts of renovation of the original MACC would be far less than impacts associated with demolition and new construction. Impacts of demolition of the Hawkins Building would be less than impacts of demolition of the original MACC because it is a smaller building and further from the single-family homes to the south.</p>
Cultural Resources	<p>Implementation of mitigation measures Cultural-3, Cultural-4 and Cultural-5 would reduce Tier II impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium as a result of Tier II of the proposed project to the maximum extent feasible. The demolition/removal of any one historical resource still would remain significant and unavoidable. The 2011 FEIR identified mitigation for demolition/removal of all five historic resources and identified a residual significant adverse impact as a result.</p>	<p>The East Campus Parking Structure (under construction) significantly impacted the MLK Campus Historic District and the Child Care Center significantly impacted the Hudson Auditorium (even though it involved renovation). The proposed renovation of the original MACC would result in reusing the MACC building. The 2013 Master Plan included demolition of the entire MACC; this impact would be less than the maximum impact considered in the 2011 FEIR since the MACC building would remain. The exterior would be cleaned and potentially a treatment applied to the building. It is not yet clear whether proposed renovations would comply with the Secretary of the Interior's Standards and therefore impacts to the MACC building and associated impacts to the MLK Campus Historic District could still be significant. The 2011 FEIR addressed the potential demolition of the Hawkins Building. Loss of this building would be a significant impact due to loss of the building and impact to the MLK Campus Historic District; this impact was addressed in the 2011 FEIR.</p>
Greenhouse Gas Emissions	<p>Mitigation measure GHG-1 would reduce CO2 emissions contributed by operation of Tier II of the proposed project, thereby assisting compliance with the goals of AB 32 to reduce CO2e emissions to 1990 levels by the year 2020. Mitigation measure GHG-1 would ensure that indirect and cumulative GHG emission impacts would be reduced to the maximum extent feasible. However, potential GHG emission</p>	<p>The renovation of the original MACC and demolition of the Hawkins Building would be part of the MLK Tier II development and as such would be a part of the unavoidable significant impact for the entire Tier II development.</p>

TABLE 2 COMPARISON OF SIGNIFICANT IMPACTS 2011 FEIR COMPARED TO IMPACTS OF THE PROPOSED BEHAVIORAL HEALTH CENTER		
Issue Area	2011 FEIR MLK Medical Center Campus Redevelopment Project	BHC
	impacts associated with construction and operation of Tier II would remain significant and unavoidable.	
Noise (Construction)	The distance from the proposed project site at which impacts to affected residential structures would be below the level of significance is 80 feet. The nearest residential land use is approximately 60 feet south of the majority of proposed construction activity. Implementation of mitigation measures Noise-1 through Noise-4 would reduce construction noise. However, the 2011 FEIR indicates that construction noise levels would exceed the 75 dBA permissible level at residences south of the proposed project site that are within 80 feet of the proposed project property. Therefore, noise impacts from construction, while temporary, would remain significant and unavoidable.	The 2011 FEIR analyzed construction impacts associated with construction activities up to the property line. Most of the construction associated with the renovation of the original MACC and demolition of the Hawkins Building would be greater than 60 feet from the southern property line and single-family residences to the south. Renovation of the original MACC would be mostly interior work, although the exterior would be cleaned potentially using sandblasting and potentially a treatment to the exterior would be applied. In general construction noise would be much less in intensity and duration as compared to demolition and new construction. Demolition activities of the Hawkins Building would be buffered from the single-family residences by the original MACC building. However, construction activity could occur on the access road and general area and therefore the impact of construction noise could still be significant, as discussed in the 2011 FEIR.

Other impacts analyzed in the 2011 FEIR (aesthetics; geology and soils; hazards and hazardous materials; hydrology and water quality; population and housing; public services; recreation; traffic and transportation; and utilities and service systems) were determined to be less than significant (see **Table 3** below for a summary comparison of all impacts analyzed in the 2011 FEIR compared to impacts of the BHC).

E. Incorporation by Reference

The following documents were referenced in the preparation of this Addendum, and are incorporated herein by reference, consistent with Section 15150 of the *Guidelines*:

- Martin Luther King Jr. Medical Center, Behavioral Health Center Feasibility Study, HMC Architects, April 16, 2018.
- Martin Luther King Jr. Medical Center Campus Redevelopment Project, Reuse of Historic Buildings and Hawkins Building Demolition, July 2018.
- County of Los Angeles, Martin Luther King, Jr. (MLK) Medical Center Campus Redevelopment, certified Final Environmental Impact Report, certified October 11, 2011. Referred to herein as the 2011 FEIR.
- Gensler, MLK Medical Center Campus Master Plan & the Willowbrook MLK Wellness Community Vision, June 2012; prepared for the County of Los Angeles; adopted January 15, 2013. Referred to herein as the 2013 Master Plan.

These documents are available for review at the LA County Department of Public Works On-Site Office at MLK Medical Campus.

F. Summary of Effects

Section 3 of this Addendum includes a detailed evaluation of any potential change in effects associated with development of the BHC (which entails renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) for each CEQA environmental issue area, organized consistent with the Appendix G of the State CEQA Guidelines. As summarized above, impacts would either be comparable or reduced as compared to those identified in the 2011 FEIR. Therefore, as discussed in this Addendum, the BHC would not trigger any of the conditions that require the preparation of a Subsequent or Supplemental EIR in Sections 15162 and 15163 of the CEQA Guidelines, and therefore an Addendum to the 2011 FEIR is the appropriate CEQA document to address these changes.

2. DESCRIPTION OF PROPOSED BEHAVIORAL HEALTH CENTER

A. Project Location and Background

The project site is the existing 38-acre (1,344,219 square feet) MLK Medical Center Campus, located at 12021 Wilmington Avenue in the unincorporated area of Willowbrook, County of Los Angeles (County), California (see **Figure 1**). The original MACC is located in the southern/center of the project site facing but set back from Wilmington Avenue. The Hawkins Building is located immediately north of the original MACC fronting on East 120th Street. The original MACC is located immediately west of the Hudson Auditorium (which is under construction to be adaptively reused for the Child Care Center) and west of the East Campus Parking Structure (completed in 2018). The MLK Campus Driveway and large green area (central lawn area) are located immediately west of the original MACC and north of the new East Campus Parking Structure and were reconfigured as part of the parking structure construction.

The original MACC is approximately 375 feet south of East 120th Street, and 650 feet west of South Wilmington Avenue. Landscaping and a narrow alley that serves as a service road/emergency driveway separates the MACC from the residential neighborhood to the south. The Hawkins Building fronts on East 120th Street, although it is set back from the roadway. In the setback area is a short wall and landscaped area.

The MLK Campus is in the unincorporated Willowbrook Community of the County of Los Angeles. It is less than 1 mile north of the City of Compton, less than 1 mile south of the City of Los Angeles, and less than 1 mile west of the City of Lynwood. The project site is designated Neighborhood Commercial (C-2; Neighborhood Business Zone) by the County.

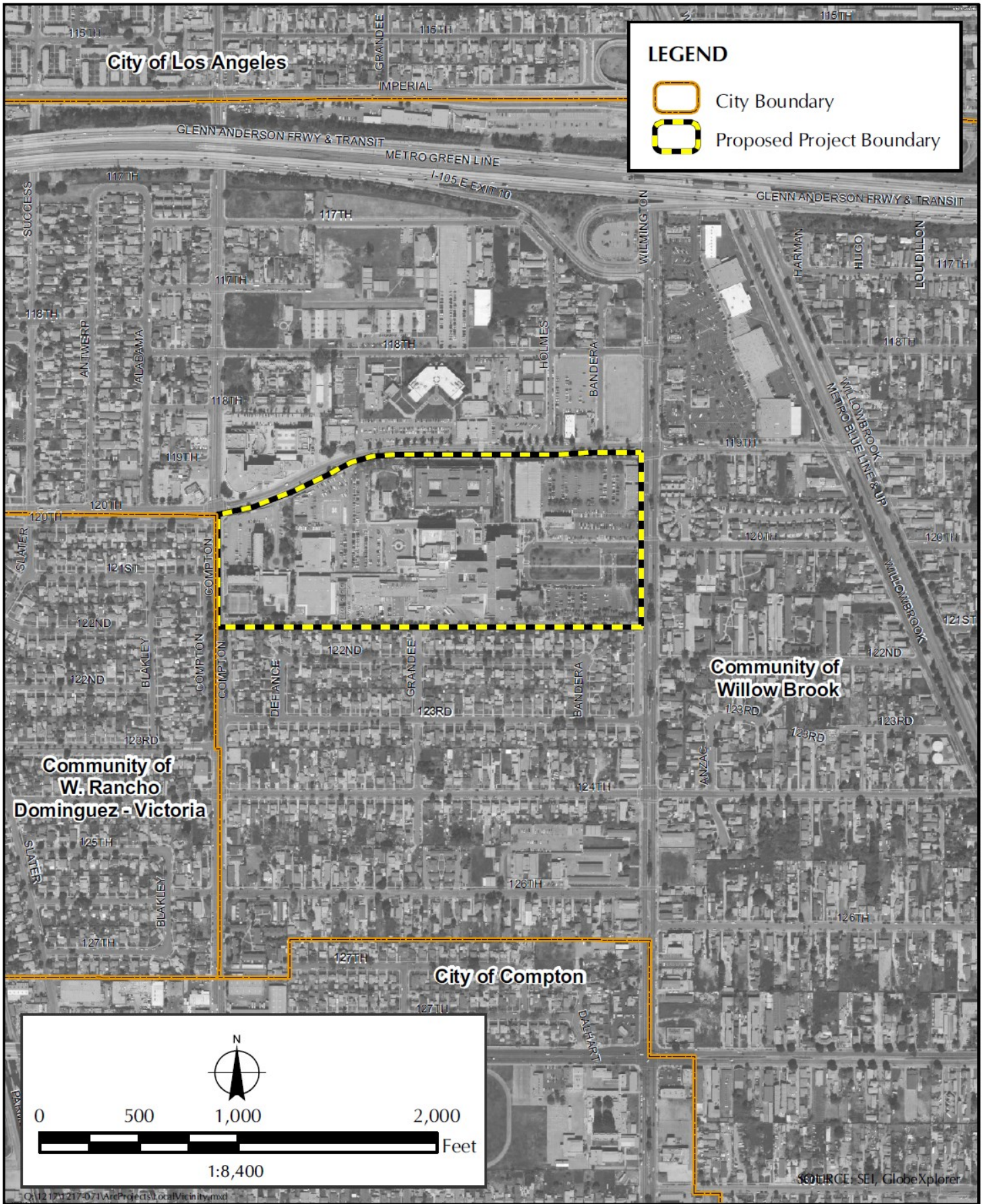
The project site is located approximately 3 miles north of State Route 91 (SR-91; Artesia Freeway), approximately 3 miles northeast of Interstate 710 (I-710; Long Beach Freeway), approximately 2 miles east of I-110 (Harbor Freeway), less than 1 mile south of SR-90 (East Imperial Highway), and less than 1 mile south of I-105 (Glen Anderson Freeway).

The topography in the vicinity of the MACC is generally flat, although it includes landscaped berms adjacent to the Hudson Auditorium southeast of the MACC and the MACC is raised above the adjacent parking lot and service alley. The elevation of the original MACC is also about 10 feet above the Hawkins Building elevation and East 120th Street.

2011 Final EIR

The 2011 FEIR evaluated specific near-term (Tier I) projects and conceptual longer-term (Tier II) projects on the MLK Campus (see **Figure 2**). The renovation of the original MACC and demolition of the Hawkins Building are proposed to be implemented as part of Tier II construction for the larger MLK Medical Center Campus Redevelopment Project.

The 2011 FEIR indicated that Tier II would potentially build out approximately 1,814,696 square feet of hospital-related development including medical offices, commercial, retail, office space, and other development in support of the mixed-use campus. The 2011 FEIR stated that Tier II development would provide “sufficient parking” for mixed-use development. The 2011 FEIR analyzed an envelope of construction extending up to 78 feet tall (including all appurtenances) along the site boundaries.



SOURCE: Final Environmental Impact Report, Volume III, 2011

MLK Medical Center Campus EIR 4th Addendum

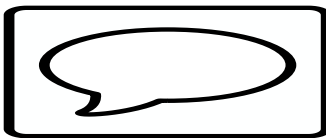
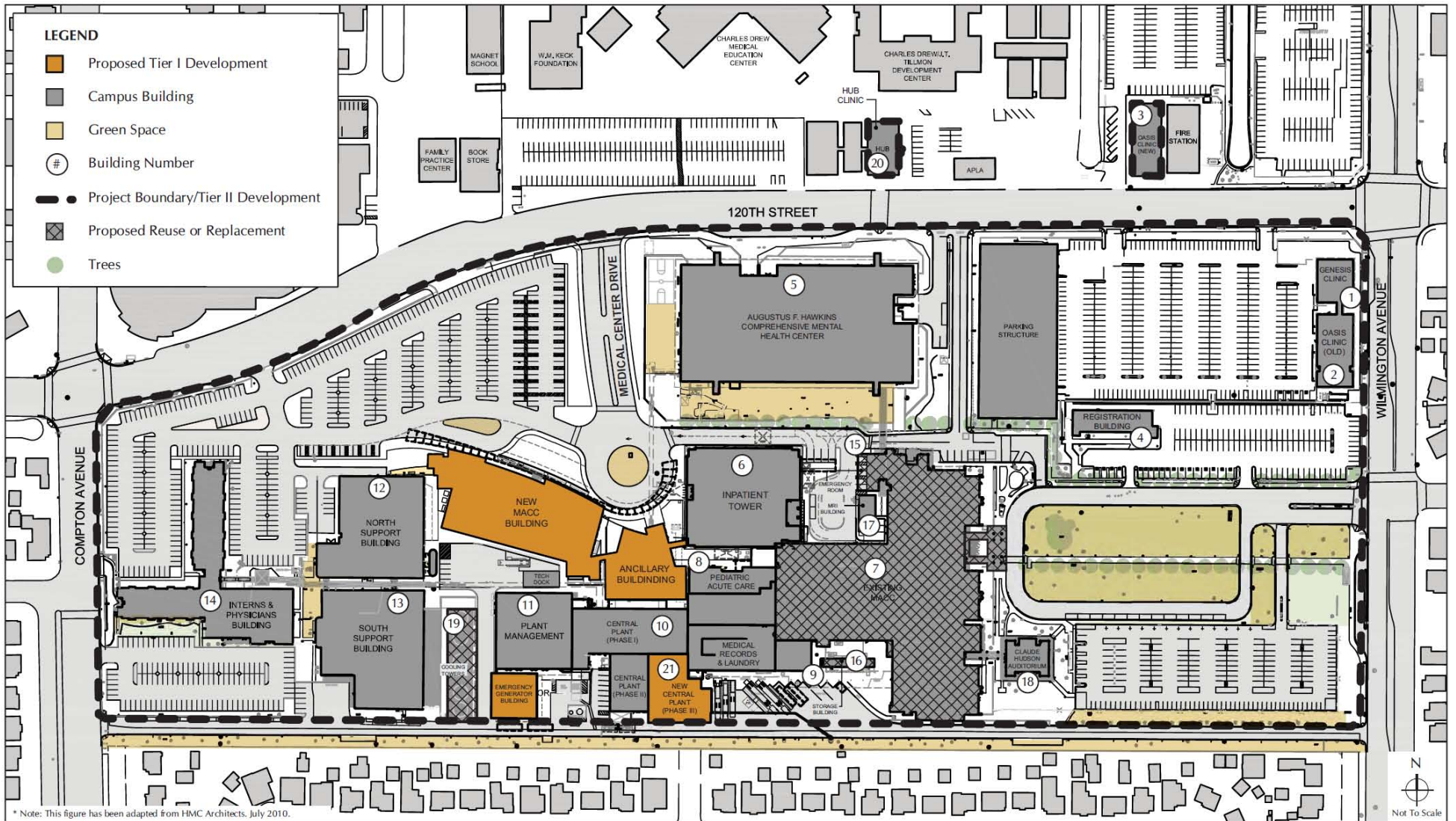


FIGURE 1
Project Location

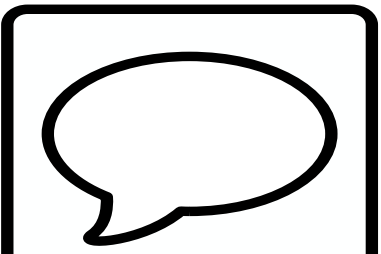


SOURCE: Final Environmental Impact Report, Volume III, 2011

MLK Medical Center Campus EIR 4th Addendum

FIGURE 2

Site Plan Analyzed in 2011 FEIR



The 2011 FEIR indicated that of the 38 acres of land on the MLK Medical Center Campus, a minimum of 10% was reserved for open space and a maximum of 40% was reserved for up to 100 residential units, walkways and parking structures and/or lots with the remainder occupied by medical center buildings.

2013 Master Plan

In 2013 The Board of Supervisors approved the MLK Medical Center Master Plan (2013 Master Plan) for the campus, which was found to be consistent with the 2011 FEIR (see **Figure 3**). The focus of the 2013 Master Plan was to provide for the growth and development of 124 acres in the Willowbrook community focused on the MLK Medical Center Campus.

The 2013 Master Plan indicates that both the original MACC and the Hawkins Building were anticipated to be demolished, however, the document also indicated that there was a possibility that the original MACC could be re-used. The 2013 Master Plan indicates that Parking Lot A to the east of the Hudson Auditorium, with a total of about 200 parking spaces (in and adjacent) would be replaced with the East Campus Parking Structure in approximately the same area as was addressed in the 1st Addendum to the 2011 FEIR (although not extending as far west) with landscaping along the north, east and south.

The 2013 Master Plan does not specifically address child care, but such uses are typical of ancillary uses to a mixed-use campus (a child care facility was analyzed in the 2nd Addendum to the 2011 FEIR).

The 2013 Master Plan indicates that the LA County Zoning Code would require 2,394 parking spaces for buildout. The total parking spaces indicated to be provided in the 2013 Master Plan is 2,553 spaces (a surplus of 159 parking spaces).

In accordance with County requirements, the 2013 Master Plan incorporates Low Impact Development (LID) Best Management Practices (BMPs) to manage stormwater runoff from the MLK Medical Center Campus.

The original MACC and Hawkins Building are within Development Area 2 that retains the land use designations for public facilities and is intended to be used for medical facilities and related support uses. Recommended BMPs for Development Area 2 include engineered wetlands, planter boxes within medians and along streets, and cisterns/rain barrels and green roofs.

The 2013 Master Plan indicates that further geotechnical testing will need to be conducted to verify that the actual infiltration rates are technically infeasible to permit infiltration.

Current Status of Master Plan

Tier I of the MLK Master Plan was completed over time, with all buildings substantially complete by the end of 2013. Tier I included development of a new MACC Building (132,000 square feet) and Ancillary Building (24,700 square feet) as well as emergency generator (4,223 square feet) and central plant (9,409 square feet). Tier I also included tenant improvements to: North Support Building (52,276 square feet), South Support Building (34,762 square feet), and the Plant Management Building (15,648 square feet); and site improvements. Relocation of the modular MRI Building (1,100 square feet) to the dock area north of the North Support Building is anticipated to occur in late 2018/early 2019.



SOURCE: MLK Medical Center Campus Master Plan & The Willowbrook MLK Wellness Community Vision, 2012

MLK Medical Center Campus EIR 4th Addendum

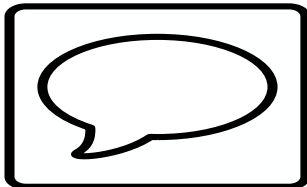


FIGURE 3

2013 Master Plan Site Plan

The adaptive reuse of three floors of the Interns and Physician Building as a recuperative care facility was the first Tier II project to be completed (in 2015). The East Campus Parking Structure was the second Tier II project and was completed in 2018. A Child Care Center, the third Tier II project, is anticipated to be completed in September 2018. A medical office building proposed for the northeast corner of campus, the fourth Tier II project, is anticipated to start construction in August 2018 and be completed in December 2019. The fifth Tier II project, the BHC (the subject of this Addendum) is anticipated to start with interior demolition in October 2019 (extending through January 2020) and building renovation extending through January 2021, with initial occupancy occurring sometime in early 2021. Interior abatement inside the Hawkins Building and preparatory exterior work would occur December 2019 through February 2020. The demolition of the Hawkins Building would take approximately four months and would begin in late February 2020 and extend through June.

Willowbrook MLK Wellness Community Vision

The 2013 Master Plan is complemented by the Willowbrook MLK Wellness Community Vision to “create a broad-based health care and wellness center of excellence...while enhancing an overall sense of place in the South Los Angeles community.” The Willowbrook MLK Wellness Community Vision is comprised of the 82 acres immediately north of the MLK Medical Center Campus extending to the freeway, and includes the Charles Drew University, King Drew Medical Magnet School as well as residential and open space uses.

Willowbrook Area Access Improvements

The Willowbrook Area Access Improvements project is located on Wilmington Avenue and 120th and 119th Streets immediately north and east of the MLK Campus (north of the main Driveway). The Willowbrook Area Access Improvements are designed to improve the mobility of pedestrians and bicyclists in the Willowbrook neighborhood adjacent to the MLK Medical Center Campus. Project improvements will include sidewalk enhancements, pavement repair, renovation of the existing landscaped median, refurbishing existing and providing new street furnishing such as bus shelters, benches, and bike racks, pedestrian lighting, traffic signal upgrades, etc. The project is complete.

B. 2011 FEIR Assumptions

The 2011 FEIR evaluated two tiers of development. Tier I included vacation of approximately 509,000 square feet of space including the emergency room (3,300 square feet) and original MACC (495,335 square feet of space) and development of two buildings and ancillary structures totaling 170,000 square feet (new MACC, ancillary building and central plant). Tier I also included tenant improvements and possible relocation of the MRI building.

Tier II of the MLK Medical Center Campus Redevelopment Plan included up to 1,814,696 square feet of development on the proposed project site. Proposed development assumed a mix of uses, including medical office, commercial, retail, office space, recreation, and other development in support of the campus. In addition, up to 100 residential units, to be developed at a multi-family density consistent with the surrounding was assumed. Tier II was assumed to entail the reuse, replacement, or removal of the existing MACC Building, Emergency Room, Storage Building, and Cooling Towers. The 2011 FEIR allowed for the demolition of the Hawkins Building. The 2011 FEIR indicated that sufficient parking would be provided for Tier II uses, but the location of parking was not specified in the 2011 FEIR.

The 2011 FEIR indicated that of the 38 acres (1.3 million square feet) of land on the MLK Medical Center Campus, a minimum of 10% was reserved for open space and a maximum of 40% was reserved for up to 100 residential units, walkways and parking structures and/or lots with the remainder anticipated to be occupied by medical center buildings.

The development of Tier II was assumed to use and incorporate materials to ensure visual consistency and continuity at the proposed project site and within the surrounding area. Development on the MLK Campus is required to comply with design goals presented in the campus planning and programming report that was prepared for the MLK Medical Center Campus by HMC Architects in 2009. The report stated that the proposed architecture should achieve the following:

- Respect the existing fabric of buildings;
- The selection of exterior material and architectural forms should make reference to the material palette of the existing campus while incorporating contemporary materials and building technologies to project the future vision of this campus;
- The juxtaposition and massing of the new buildings should be strategically located to allow visitors a pleasurable aesthetic experience; and
- The open spaces created in between the buildings are designed the variations in size, shape, and scale that are conducive to pedestrian travel through the campus.

For purposes of assessing aesthetic/shadow impacts the 2011 FEIR evaluated building heights of up to 78 feet tall (including appurtenances) placed along the project site property line.

The potential construction scenario for Tier II was envisioned as a multi-phase process. The construction scenario for Tier II was to develop all Tier II uses within an approximately 10-year timeframe, between 2010 and 2020. Tier I was completed at the end of 2013. Tier II started with the adaptive reuse of three floors of the Interns and Physicians building (completed in 2015); build out of Tier II is currently anticipated to occur later than 2020, likely in 2026 or beyond.

The FEIR indicates (page 2-26) that it is anticipated that the site Emergency Response and Evacuation plans would be updated for both Tier I and Tier II of the proposed project as appropriate and that these plans would address all campus development, as each building is completed. The FEIR indicates (page 2-26) it is understood that communication with the County Fire Department, Sheriff's Department, and other emergency response agencies would continue throughout the development of both tiers of the proposed project. It was further understood that the County of Los Angeles would coordinate with the respective service agencies for Tier II of the proposed project to review the specific proposed development during the planning phase of the proposed project to confirm whether Tier II of the proposed project adequately meets the requirements of the respective service providers.

The analysis of construction impacts was based on an aggressive scenario (allowing build out of the campus to the maximum extent possible with reasonable worst-case assumptions with respect to operation of equipment) to allow the consideration of a reasonable worst-case environmental impacts scenario, which encompasses the maximum anticipated impacts of the proposed project, in the event that the County chooses to complete up to 1,814,696 square feet of development.

The type and quantity of equipment that would potentially be used in construction of Tier II was anticipated to vary for each component. For the purposes of the analysis in the FEIR, it was

anticipated that development of Tier II would require multiple phases that would use equipment comparable to that shown in **Table 3**, below.

Site preparation and construction is required to be in accordance with all federal, state, and county building codes. The FEIR anticipated that for Tier I alone, excavation of up to 40,000 cubic yards of dirt to a depth of up to 45 feet. Daily construction activities are subject to County noise regulations. All construction-related activities are required to be scheduled in compliance with the County Noise Ordinance, which prohibits construction activities and operation of construction equipment between the hours of 8:00 p.m. and 7:00 a.m., Monday through Friday, or at any time on Sunday or holidays. Work conducted on Saturdays must not commence before 7:00 a.m. and must end no later than 5:00 p.m. Noise levels exceeding 65 dBA (decibels, A-weighted sound levels) for single-family residences and 70 dBA for multifamily residences during construction hours are prohibited.

TABLE 3 ANTICIPATED CONSTRUCTION EQUIPMENT FOR REDEVELOPMENT PROJECT		
Approximate Quantity	Type of Equipment or Vehicle	Approximate Duration of On-Site Construction Activity (in months)
2	Man lift	3
4	Pickup truck	8
2	Hand compactor	5
2	Crane	3
1	Concrete mixer	4
1	Backhoe	3
40–60	Crew members	8
50	Crew vehicles (maximum)	8
1	Pile Driver	6
1	Large Bulldozer	3
2	Dozer	3
1	Front-end loader	1
1	Water truck	2
1	Grader	1
5	Dump truck	6
16	Concrete mix truck	9
1	Roller	1
3	Fork lift / grade all	3
SOURCE: MLK Medical Center Campus Redevelopment, Mitigation Monitoring Program (Table II.2-1 page II-6); February 2011		

The construction contractor is required to ensure that source-reduction techniques and the development of recycling programs during construction and operation of the proposed project are considered and implemented whenever possible. The construction contractor is also required to incorporate BMPs consistent with the guidelines provided in the California Storm Water Best Management Practice Handbooks: Construction. BMPs to control surface runoff and soil erosion are required for construction taking place during rainy periods. Construction equipment used during the development of Tier II is required to be turned off when not in use to reduce idling to the maximum extent possible. The construction contractor is required to ensure that all construction and grading equipment is properly maintained. All vehicles and compressors are required to be equipped with exhaust mufflers and engine enclosure covers (as designed by the manufacturer) at all times.

It was anticipated that on average, up to 400 construction workers would be on-site at any given time during the construction of Tier II projects. In addition, approximately 60 County project and construction management staff are assumed to be at the site during Tier II construction. However, it was indicated this number could vary as a result of the type and/or amount of work being completed on-site. Construction-related ingress and egress to the project site was assumed to occur primarily off East 120th Street to the north or Wilmington Avenue to the east.

C. Behavioral Health Center

The original MACC (495,335 square feet), was vacated as part of Tier I. Demolition of the original MACC was one option considered in the 2011 FEIR and was identified as an option in the 2013 Master Plan although the 2013 Master Plan Site Plan indicated that the original MACC was to be removed. The County has determined that renovation and adaptive reuse for the original MACC for the Behavioral Health Center (BHC) is now the preferred option. Because of the programmatic needs of the BHC (for multiple secure and private garden spaces to complement the multiple BHC programs) it is not possible to keep the Hawkins Building, rather this building is to be demolished and replaced with gardens and surface parking to ensure parking demand for the BHC is met.

Project Characteristics

The County proposes to develop the BHC that would entail 1) renovation of the original MACC, and 2) demolition of the Hawkins Building and replacement with gardens and surface parking. The BHC is to provide integrated healthcare and mental health care outpatient and residential services. This facility is planned to serve as a mental health portal and is designed to provide integrated mental and urgent health care through collaborative and cooperative programs. It is planned to include approximately 10 separate tenants (with different jurisdictional and licensing requirements) and approximately 15 separate programs, totaling over 500,000 square feet of programmed space. The exterior of the building would be cleaned and potentially a treatment applied. An architectural historian will be on the design team to maximize retention of character-defining historic material.

The first and basement levels of the BHC are proposed to house various outpatient programs, administrative programs, and public spaces. The 2nd through 5th levels of the building are proposed to house various residential, outpatient, and inpatient programs, such as mental health rehabilitation, Office of Diversion and Reentry (ODR) housing (criminal justice diversion), substance use disorder residential, crisis residential, and psychiatric health. Many of the inpatient and/or residential programs require dedicated entrances, secured entrances, and/or dual entrances (public and private) to their program space. Separate entrances for certain programs are required to ensure privacy and security and are required by licensing.

The existing sunken garden and courtyard area south of the Hawkins Building, as well as, potentially, the bridge from the 2nd level of the original MACC to the area, would be reconfigured and re-purposed for healthcare-related access and gardens. The design of the gardens has not yet been determined and would be developed with input from the architectural historian working as part of the design team in order to maximize retention of character-defining historic fabric.

The gardens would serve as required outdoor space for some of the various inpatient and/or residential programs. Though the original MACC includes courtyards that provide some recreation/open space, additional garden space is required due to the quantity of programs and the restrictions on intermingling of residents/patients from different programs and the need for

security and/or privacy for some of the programs. These gardens will be designed to enhance the central spine of the campus, as well as provide reflective and creative space for both patients and visitors.

Lighting

In accordance with adopted Mitigation Measure Aesthetics-1, all exterior lighting for building and on-site security lighting would be shielded and directed downwards to minimize the impacts on the surrounding land uses.

Days and Hours of Operation

The various programs in the BHC would have different hours of operation. Generally the outpatient programs would be open to the public from approximately 6:30 am to 7:00 pm Monday to Friday and Saturday 8:00 am to 4:00 pm. The inpatient and residential programs accept new patients 24 hours a day, 7 days per week.

Demolition and Construction Activities

Project demolition and renovation activities would be typical of such activities and would be well within the assumptions made in the 2011 FEIR (as identified in Table 3 above). Renovation activities are generally far less intense than construction activities, except for building cleaning (possibly sandblasting) which would be similar in intensity to some of the building construction activities but of much shorter duration. The demolition of the Hawkins Building and subsequent site preparation would entail similar activities to those analyzed to occur within 60 feet of the sensitive single-family homes to the south. Demolition of the Hawkins Building and subsequent site preparation and construction of the gardens and surface parking would be buffered from these sensitive uses by the original MACC that is to remain.

The Mitigation Monitoring Program indicates that Tier II would require multiple phases and would require use of equipment comparable to the equipment identified in Table 3 above. Demolition of the Hawkins Building and renovation of the original MACC would not overlap with construction of the Child Care Center or medical office building at the northwest corner of the MLK Campus. The specific equipment list has not yet been developed for demolition and renovation activities but simultaneous activity renovating the original MACC and demolishing the Hawkins Building would result in use of equipment that would be comparable, with no greater impacts compared to the equipment identified in Table 3. The renovation of the MACC would involve activities that would be mostly internal to the building and therefore considerably less noisy than construction activities associated with demolition and construction of a new building (except for possible sandblasting of the exterior for a brief period).

As noted in the 2011 FEIR, construction is not allowed between 8:00 pm and 7:00 am Monday through Friday or anytime on Sunday. Saturday construction could occur between 7:00 am and 5:00 pm. Duration of the main construction activities is shown below.

Schedule

Renovation of the MACC is anticipated to start with interior demolition in October 2019 (extending through January 2020) and building renovation extending through January 2021, with initial occupancy occurring sometime in early 2021. Interior abatement inside the Hawkins Building and preparatory exterior work would occur December 2019 through February 2020. The

demolition of the Hawkins Building would take approximately four months and would begin in late February 2020 and extend through June 2020.

Discretionary Actions and Approvals

The development of the BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) requires approval by the County.

Project Objectives

Project objectives identified in the 2011 FEIR remain relevant and applicable to the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking). The objectives for Tier II include:

- Provide opportunities for development of up to 1,814,696 square feet of mixed use, including medical office, commercial, retail, residential, recreational, office space, and other development in support of the campus that are appurtenant to and compatible with the primary land use of a community-based health program facility.
- Provide sufficient parking for mixed-use development.

3. ENVIRONMENTAL SETTING AND IMPACT ANALYSIS

The certified Final EIR for the Martin Luther King Jr. Medical Center Campus Redevelopment Project (2011 FEIR) determined that the proposed redevelopment of the campus (Tier II, of which the project is a part) would result in significant and unavoidable impacts in the issue areas identified below. The following discussion also compares impacts of the BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) to the conclusions of the 2011 FEIR.

- 1) **Air Quality -- Construction:** Emissions could exceed regional daily thresholds for VOCs and NOx and localized thresholds for NOx, PM2.5 and PM10 -- based on assumed equipment use and distance to sensitive receptors. **Operations:** Emissions would exceed regional daily thresholds for VOCs, NOx, CO and PM10. Demolition of the Hawkins Building, subsequent site preparation and activities associated with renovation of the original MACC together with any overlapping activities at the medical office building site at the northeast corner of the MLK Campus would result in peak daily emissions within those analyzed in the 2011 FEIR. However, impacts could remain significant. Trips generated by the renovation of the original MACC would be within the trip generation analyzed in the 2011 FEIR and could contribute to the significant impact associated with operation of the overall MLK Campus on completion of the overall MLK Redevelopment Project.
- 2) **Cultural Resources -- Impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium (Hudson Auditorium)** as a result of implementation of Tier II. The demolition/removal of these historical resources was identified as a significant and unavoidable impact. Demolition of the Hawkins Building was provided for in the 2011 FEIR and would be a significant impact as a result of loss of an historic building that also contributes to the MLK Historic District. The loss of the Hawkins Building was identified as a potential impact in the 2011 FEIR. Renovation of the original MACC, with the exterior remaining substantially in its current form except possibly with application of a treatment, would result in the retention of one of the five identified historic resources on the MLK Campus, thereby reducing the impact to this historic resource and the MLK Campus in general. However, the extent of renovation may not be fully consistent with the secretary of the Interior's Standards for Rehabilitation and therefore the impact to this resource could still remain significant as identified in the 2011 FEIR. Depending on the extent of exterior treatment, the impact to the MLK Campus Historic District as a result of changes to the original MACC could also be significant.
- 3) **Greenhouse Gases -- Potential GHG emission impacts associated with construction and operation of Tier II** would be significant and unavoidable; the renovation of the original MACC and subsequent reuse by the BHC would contribute to GHG emissions for the MLK Campus as a whole on completion of all redevelopment analyzed in the 2011 FEIR resulting in a significant impact.
- 4) **Construction Noise --** The nearest residential land use to the original MACC is approximately 64 feet to the south. The 2011 FEIR indicates that construction noise levels would exceed the 75 dBA threshold level at residences that are within 80 feet of construction activities. As discussed in the 2011 FEIR, construction noise impacts would be significant and unavoidable at residences within 80 feet including those south of the MACC. However, construction noise associated with renovation is much less than that associated with new construction both in terms of intensity and duration. Building cleaning could involve brief

sandblasting or other techniques and possibly application of an exterior treatment within 80 feet of the single-family residences to the south. Such activities are typical of maintenance as well as renovation and area reasonably anticipated to occur as a result of development and renovation on the MLK Campus.

All remaining impacts were found to be less than significant with mitigation incorporated, less than significant or no impact.

As documented in the analyses below and summarized in **Table 4** below, with the mitigation measures previously adopted with the 2011 FEIR, impacts previously identified as significant would not be worsened, and no new significant or potentially significant impacts to the physical environment would occur as a result of the BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking). Accordingly, the following discussion supports the County's conclusion, pursuant to State CEQA Guidelines Section 15164, that an Addendum is appropriate, and supports a determination by the County that no subsequent EIR is required.

Impact	Level of Significance -- Tier II 2011 FEIR	Level of Significance -- BHC
Aesthetics		
Increase in light and glare.	<i>Less than significant with mitigation.</i> Based on conceptual height (maximum of 78 feet in this location), setback and mitigation measures.	<i>Less than significant with mitigation.</i> The proposed renovation of the original MACC would not increase the height of the existing structure. The project would be required to comply with mitigation measures identified in the 2011 FEIR that would reduce impacts from light and glare to a less than significant level.
Degradation of visual character; or increases in shading of sensitive uses.	<i>Less than significant with mitigation.</i> Based on height not exceeding 78 feet, assumed setbacks and mitigation measures.	<i>Less than significant with mitigation.</i> The renovated MACC would not be taller than the existing building and would comply with all mitigation measures from the 2011 FEIR.
Agricultural and Forest Resources		
There are no agricultural or forest resources on-site.	<i>No impact.</i> This issue was dismissed in the 2011 FEIR Initial Study.	<i>No Impact.</i> There are no agricultural or forest resources on the MLK Medical Center Campus.
Air Quality		
Air emissions during construction and operation.	<i>Significant.</i> For both construction and operation. Construction: Emissions would exceed regional daily thresholds for VOCs and NOx and localized thresholds for NOx, PM2.5 and PM10 -- based on assumed equipment use and distance to sensitive receptors. Operations: Emissions would exceed regional daily thresholds for VOCs, NOx, CO and PM10.	<i>Significant.</i> Renovation of the original MACC and demolition and subsequent site clearing of the Hawkins Building would involve use of equipment resulting in emissions no greater than assumed in the 2011 FEIR. Construction air quality impacts along the southern boundary of the site adjacent to the single-family residential neighborhood would likely be less. Overall impacts would similar to or less than was analyzed in the 2011 FEIR because the original MACC is to remain. Adopted mitigation measures would continue to reduce impacts but possibly not below a level of significance. While trips associated with the BHC would not result in the MLK Campus as a whole exceeding the trips identified as existing in the 2011 FEIR, on completion of Tier II,

TABLE 4
SUMMARY OF IMPACTS – 2011 FEIR COMPARED TO IMPACTS OF THE PROPOSED BEHAVIORAL HEALTH CENTER

Impact	Level of Significance -- Tier II 2011 FEIR	Level of Significance -- BHC
		emissions could still exceed SCAQMD thresholds.
Biological Resources		
There are minimal biological resources on the campus.	<i>No impact.</i> Minimal biological resources present on the campus; compliance with existing regulations is required. This issue was dismissed in the 2011 FEIR Initial Study.	<i>No impact.</i> Minimal biological resources are located on the site. Ornamental trees could be removed; County must comply with Migratory Birds Treaty Act to protect nesting birds.
Cultural Resources		
Historic Resources. Impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium. Potential for demolition/removal of all these resources identified as significant and unavoidable impact.	<i>Significant.</i> As a result of potential impacts to the identified resources. The 2011 FEIR analyzed and provided mitigation measures for demolition of all historic resources on the campus (including the original MACC and Hawkins Building). In addition, the 2013 Master Plan (that was found to be consistent with the 2011 FEIR) included demolition of the original MACC and Hawkins Building.	<i>Significant.</i> The renovation of the original MACC would retain an important historic building on the MLK Campus; an exterior treatment may be applied to the building and renovation may not be consistent with the Secretary of the Interior's Standards and therefore impacts to the building while less could still be significant. Depending on the extent of exterior treatment, renovation of the MACC could also significantly impact the MLK Campus Historic District. Demolition of the Hawkins Building would be a significant impact to that historic building and the MLK Campus Historic District.
Archaeological, Paleontological and human remains impacts.	As a result of required mitigation measures the 2011 FEIR concludes that impacts to Archaeological, Paleontological and human remains impacts would be less than significant with mitigation.	Archaeological, Paleontological and human remains impacts would continue to be less than significant with mitigation.
Geology and Soils		
Seismicity, erosion, unstable soils.	<i>Less than significant with mitigation.</i> As a result of compliance with existing regulations and mitigation.	<i>Less than significant with mitigation.</i> Similar impacts due to the same site conditions and compliance with existing regulations and required mitigation measures.
Greenhouse Gas Emissions		
GHG emissions as a result of operational activities.	<i>Significant.</i> As a result of building sizes and anticipated vehicle trips.	<i>Significant.</i> The renovation of the MACC and reuse with the BHC would be an integral part of the overall MLK Campus redevelopment Plan analyzed in the 2011 FEIR. It would be part of the anticipated significant increase in GHG emissions. Increased use of the nearby transit (Willowbrook Rosa Parks Station) could result in fewer emissions than previously identified.
Hazards and Hazardous Materials		
On-site hazardous materials associated with former uses of the property including older buildings with asbestos and lead based paint.	<i>Less than significant with mitigation.</i> As a result of previous use of the site and required mitigation.	<i>Less than Significant with Mitigation.</i> Compliance with existing regulations and mitigation measures would result in impacts being similar impacts to 2011 FEIR.

TABLE 4 SUMMARY OF IMPACTS – 2011 FEIR COMPARED TO IMPACTS OF THE PROPOSED BEHAVIORAL HEALTH CENTER		
Impact	Level of Significance -- Tier II 2011 FEIR	Level of Significance -- BHC
Hydrology and Water Quality		
Increased impervious surfaces resulting in increased runoff. Construction activities and polluted runoff and sedimentation.	<i>Less than significant with mitigation.</i> As a result of increases in impervious surfaces and compliance with mitigation measures.	<i>Less than significant with mitigation.</i> The impact would be similar as site conditions would be similar (to impacts analyzed in EIR).
Land Use and Planning		
Potential to divide a community and consistency with applicable plans.	<i>No impact.</i> This issue was dismissed in the 2011 FEIR Initial Study because the proposed redevelopment of the MLK Campus would be continuation of an existing use.	<i>No impact.</i> Renovation of the original MACC and demolition of the Hawkins Building and subsequent development with gardens and surface parking would be part of Tier II development analyzed in the 2011 FEIR and would represent continuation of the existing use of the campus.
Mineral Resources		
There are no mineral resources on the campus.	<i>No impact.</i> Since there are no mineral resources known to exist on the MLK Medical Center Campus. This issue was dismissed in the 2011 FEIR Initial Study.	<i>No impact.</i> No mineral resources are known to exist on the MLK Medical Center Campus including the original MACC and Hawkins Building sites.
Noise		
Construction noise and vibration impacts to adjacent uses. Operational noise from equipment and vehicles.	<i>Significant.</i> Based on anticipated construction equipment and distance to sensitive receptors. Mitigation would reduce noise but not below a level of significance. As a result of increased vehicle trips operational noise would increase but by a less than significant amount.	<i>Significant.</i> Demolition and site preparation noise at the Hawkins Building site would occur as described in the 2011 FEIR. Renovation of the original MACC would involve mostly interior work which would be much quieter than demolition and new construction analyzed in the 2011 FEIR. However, cleaning of the exterior of the original MACC could involve sandblasting and/or other techniques that would result in a brief period of loud noise. Impacts would not be greater than was analyzed in the 2011 FEIR. Adopted mitigation measures would continue to reduce impacts but not below a level of significance due to proximity to residential uses to the south. The BHC would not result in an increase in trips above those that occurred on the site prior to initiation of master planning in 2011. Ultimate buildout would result in operational noise the same as analyzed in the 2011 FEIR.
Population and Housing		
Induce population growth displace housing or people.	<i>Less than significant.</i> Based on job creation (400 construction jobs and 100 permanent jobs) and no housing displaced.	<i>Less than significant.</i> The renovation of the MACC and demolition of the Hawkins Building and construction of new gardens and surface parking would create construction jobs and would not displace housing. The BHC would employ about 925 people of which 289 would relocate from uses currently in other buildings on the MLK Campus.

TABLE 4 SUMMARY OF IMPACTS – 2011 FEIR COMPARED TO IMPACTS OF THE PROPOSED BEHAVIORAL HEALTH CENTER		
Impact	Level of Significance -- Tier II 2011 FEIR	Level of Significance -- BHC
Public Services		
Impact to emergency access, police services, library services and parks.	Based on size of proposed development and increased vehicle trips, the 2011 FEIR concludes impacts to Public Services would be less than significant.	Less than significant. The BHC would not generate substantial increase in vehicle trips or demand for public services as a result of increased development. Impacts would be within impacts analyzed in the 2011 FEIR.
Recreation		
Impact on recreational facilities.	<i>Less than significant.</i> Based on limited potential for increased population, approximately 400 construction jobs and net new 100 new permanent jobs.	<i>Less than significant.</i> The BHC would have multiple on-site garden areas for the patients, staff and visitors, and would not generate impacts on recreational facilities.
Transportation and Traffic		
Traffic impacts during construction; and impacts to local intersections and street segments during operation.	<i>Less than significant with mitigation.</i> Based on vehicle trips that would be generated by developed area and required mitigation measures.	<i>Less than significant with mitigation.</i> The BHC together with Tier II development undertaken so far would not generate more trips than occurred prior to the analysis undertaken in the 2011 FEIR. Impacts would be within those analyzed in the 2011 FEIR and no additional traffic mitigation measures would be triggered beyond those implemented with the East Campus Parking Structure.
Utilities and Service Systems		
Impacts to wastewater, water, storm water and solid waste.	<i>Less than significant with mitigation.</i> Based on developed area and required mitigation measures, the 2011 FEIR concludes that.	<i>Less than significant with mitigation.</i> The renovation of the MACC for the BHC would be within the development assumptions for the MLK Campus as a whole; impacts would be within those identified in the 2011 FEIR.

A. AESTHETICS

The potential for the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) to result in new or substantially more adverse significant impacts to aesthetics was evaluated in relation to the 2011 FEIR analysis and required mitigation contained in the 2011 FEIR. Photographs of the original MACC and reconfigured green area are shown in **Figures 4** and **5**. Photographs of the Hawkins Building are shown in **Figures 6** and **7**. A photograph of the walled garden south of the Hawkins Building is shown in **Figure 8**.



Figure 4
View West of Original MACC (Future BHC) and Reconfigured Green Area



Figure 5
Reconfigured Green Area and “Timeline Walkway”



Figure 6
View of Hawkins Building looking South from 120th Street



Figure 7
View of Hawkins Building looking Northeast



Figure 8
View of Hawkins Building and Walled Courtyard looking West

(a) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to impacts on scenic vistas?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates that the MLK Campus (including the BHC site) is not within a scenic vista, and there are no scenic vistas identified within the vicinity. Existing development on the campus consists of the Martin Luther King, Jr. Medical Center, which provides medical services to the South Los Angeles community. The 2011 FEIR concluded no impacts to scenic vistas.

The original MACC would remain in its present configuration; the Hawkins Building would be demolished and replaced with gardens and surface parking. Public facilities, commercial development, and residential development -- all of which are typical of an urban setting -- comprise the land uses surrounding the proposed project site. Consistent with the analysis and conclusions of the 2011 FEIR (Initial Study), the proposed BHC, would not impact scenic vistas. There would be no new or greater impacts than those identified in the certified 2011 FEIR.

(b) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concluded no impacts to scenic resources within a state scenic highway. As analyzed in the 2011 FEIR, the nearest eligible or officially designated scenic highway or historic parkway is California State Route 110 (SR 110), located approximately 2 miles to the west of the proposed project site. The proposed project site cannot be viewed from SR 110 due to distance. The distance from the scenic route, the site's overall flat topography, and the fact that the renovated original MACC height would not change and therefore would result in no impact to public views. (The 2011 FEIR analyzed a maximum height of 78 feet.) The BHC would not result in new or greater impacts in relation to scenic resources within a state scenic highway. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(c) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to degradation of existing visual character or quality of the site and its surroundings?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As described in the 2011 FEIR, the existing MLK Medical Center Campus includes the six-story main hospital tower located on the south-facing portion of the campus, as well as an adjacent five-story building, and various other structures and support buildings that surround these structures. The support buildings include a two-story medical records building, the one-story Pediatric Acute Care Building, and the three-story Hawkins Building, as well as other support buildings that range in height from one to six stories. The area surrounding the original MACC and Hawkins Building is characterized by common urban development, where land uses include public facilities, commercial development, and residential development. The 2011 FEIR concluded less than significant impacts with mitigation (Mitigation Measures Aesthetics-1 through Aesthetics-4).

The BHC would be consistent in character with surrounding development. The height of the original MACC structure would remain the same as the existing structure, the Hawkins Building would be replaced with gardens and a small parking lot.

The 2011 FEIR did not specify landscaping for Tier II as the project was conceptual in nature. Landscaping would enhance visual character. The BHC would include a large garden area and small parking lot in the location of the existing Hawkins Building. Given limited changes to the original MACC exterior and removal of a large concrete structure and replacement with gardens and a small parking lot, impacts to visual character and quality would be less than significant consistent with the certified 2011 FEIR.

(d) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates that the existing campus includes security, landscape and perimeter lighting on the site and adjacent properties, including streetlights along major thoroughfares and the emergency access roadway. The 2011 FEIR concludes a less than significant impact with mitigation with respect to light and glare and nighttime views (Mitigation Measures Aesthetics-1 through Aesthetics-4).

In accordance with Mitigation Measure Aesthetics-1, all exterior lighting for building and on-site security lighting would be shielded and directed downwards to minimize the impacts on the surrounding land uses. The original MACC would stay substantially as is with no new sources of light and glare. Removal of the Hawkins Building would not adversely affect light and glare.

No additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

B. AGRICULTURAL AND FOREST RESOURCES

The potential for the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) to result in new or substantially more adverse significant impacts to agricultural and forest resources compared to the 2011 FEIR was evaluated in relation to five questions recommended for consideration by the State CEQA Guidelines.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to any of the following:		
(a) 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 non-agricultural use?		
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?		
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?		
(d) Result in the loss of forest land or conversion of forest land to non-forest use?		
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concluded no impacts to agricultural and forest resources as there are no such resources present on the project site. The project site is located in an urban area. There is no farmland, timberland or forest located on the project site or in the vicinity. The project site does not contain any farmland or agricultural uses, nor are any such lands located within close proximity to the site such that the proposed project could potentially create indirect impacts. The proposed BHC would continue to have no impact with respect to agricultural and forest resources, consistent with the analysis and conclusions in the 2011 FEIR (Initial Study). Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

C. AIR QUALITY

Air quality impacts of the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) were evaluated with regard to the 2011 FEIR. The potential for the proposed BHC to result in new or substantially more adverse significant impacts to air quality than analyzed in the 2011 FEIR was evaluated in relation to five questions recommended for consideration by the State CEQA Guidelines.

(a) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to conflict with or the potential to obstruct implementation of the applicable air quality plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR determined that development of the proposed MLK Medical Center was within the Southern California Association of Governments (SCAG) forecast for the area and would therefore be consistent with growth assumptions included within the most recent AQMP. As indicated in the 2011 FEIR, the proposed Tier II development (of which the BHC would be an integral part) would result in significant construction and operational impacts associated with emissions of criteria pollutants (see below). The proposed BHC would be within the assumptions made in the 2011 FEIR and would not result in additional air quality impacts. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(b) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the potential to violate any air quality standard or contribute substantially to existing or projected air violation?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates that Mitigation Measure Air-9 would ensure that criteria pollutants emissions associated with the use of construction equipment would be reduced to the maximum extent feasible. However, VOCs and NO_x emissions during construction could still exceed regional daily thresholds and could result in temporary significant and unavoidable impacts. Mitigation Measures Air-1 through Air-9 would ensure that air quality impacts on sensitive receptors during construction would be reduced to the maximum extent feasible. However, construction of Tier II (that includes renovation of the original MACC, and demolition of the Hawkins Building together with any overlapping construction activity at the medical office building at the northeast corner of the MLK Campus) would still have the potential to briefly result in significant impacts to sensitive receptors related to emissions of NO_x, PM_{2.5}, and PM₁₀.

The 2011 FEIR indicated that there are no feasible mitigation measures for operation of Tier II and therefore, criteria pollutant emissions from mobile sources on completion of Tier II would exceed daily regional emissions thresholds and would remain significant for VOCs, NO_x, CO and PM₁₀. The proposed BHC would not increase the number of trips compared to existing conditions identified in the 2011 FEIR, and therefore emissions as a result of the BHC together with Tier II development completed and proposed to date would not be expected to result in a significant impact. However, the project would be a part of the development as a whole and would therefore be a component of the impacts analyzed in the 2011 FEIR. The proposed BHC would be within the assumptions made in the 2011 FEIR and would not result in any additional air quality impacts. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(c) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As discussed above, Tier II development of the MLK Medical Center (of which the proposed BHC is a part) could briefly result in significant impacts to sensitive receptors during demolition and construction activities as a result of emissions of NO_x, PM_{2.5} and PM₁₀.

Construction could also result in exceedances of regional daily thresholds for VOC and NO_x. On completion of the MLK Redevelopment project as a whole, operational emissions were calculated to exceed regional daily thresholds for VOCs, NO_x, CO and PM₁₀. The proposed BHC would be within the assumptions made in the 2011 FEIR and would not result in any additional air quality impacts. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(d) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the potential to expose sensitive receptors to substantial pollutant concentrations?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR analyzed a development envelope for the entire campus assuming grading to property lines. The 2011 FEIR found that adjacent sensitive receptors would be exposed to NO_x, PM₁₀ and PM_{2.5} above the level of significance even after implementation of Mitigation Measures Air-1 through Air-9.

The majority of construction activity associated with the proposed BHC would be set back more than 60 feet from the property line adjacent to sensitive receptors (single-family homes) to the south. Since the majority of construction activity would be set back further than analyzed in the 2011 FEIR, impacts could be less than analyzed in the 2011 FEIR but could remain significant. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(e) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to creating objectionable odors affecting a substantial number of people?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concluded less than significant impact with mitigation with respect to odors. Consistent with the analysis in the 2011 FEIR, the proposed BHC would not result in unusual or objectionable odors. During demolition, construction and renovation, paving of the site would involve application of asphalt that can produce discernible odors typical of most construction sites. In addition, use of heavy construction equipment and the application of paints and coatings can also be a source of discernible odors. Mitigation measures to reduce construction emissions would also reduce odors. Any temporary odors would be typical in an urban environment and would be short-term in nature. Therefore, they would not be considered a significant environmental impact. With respect to operation, uses that are typically considered by the SCAQMD to be a source of odor complaints (agriculture uses, food processing and chemical plants, composting refineries, landfills and other uses) are not proposed. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

D. BIOLOGICAL RESOURCES

The potential for the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) to result in new or substantially more adverse significant impacts to biological resources than analyzed in the 2011 FEIR was evaluated in relation to six questions recommended for consideration by the State California Environmental Quality Act Guidelines.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (a) 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 Wildlife or U.S. Fish and Wildlife Service (USFWS)?
- (b) 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 Wildlife or U.S. Fish and Wildlife Service?
- (c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- (d) 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As indicated in the 2011 FEIR, the MLK Medical Center Campus is a hospital facility with landscaped areas, characterized by hospital and medical functions. The campus is a completely developed property. The 2011 FEIR concluded no impacts to biological resources.

The 2011 FEIR summarizes the California Natural Diversity Database (CNDDDB) with respect to the project site. The 2011 FEIR indicates that 18 listed species that are known to exist in the area, including 8 plant species and 10 wildlife species. Of the 18 species listed as rare, threatened, or endangered pursuant to the federal and state Endangered Species Acts that were identified as having the potential to occur in the region of southwestern County of Los Angeles, none were determined to have the potential to occur within the project area due to lack of suitable habitat.

Due to the lack of habitats suitable to support sensitive and locally important species, the 2011 FEIR determined that locally important species are absent from the MLK Campus. Therefore, the 2011 FEIR identifies no impacts to biological resources related to sensitive species recognized by the USFWS as federal species of concern, by the California Department of Fish and Wildlife as California special concern species or locally important species afforded protection by the California Native Plant Society (CNPS).

The 2011 FEIR indicated that the MLK Medical Center Campus does not contain riparian habitat, wetlands or other sensitive natural communities. Based on the results of the review of the USGS 7.5-minute series South Gate topographic quadrangle and the National Wetlands Inventory map, no natural communities exist within the proposed project area. No suitable habitat exists to encourage wildlife movement.

The MLK Campus (including the area to be impacted by the BHC) has landscaping and large trees that may be suitable for nesting birds. The project would remove a number of trees of varying sizes and replace them with new trees in the new gardens (the design has yet to be determined). In removing large trees, the 2011 FEIR indicates that the County must comply

with the Migratory Birds Treat Act, which prohibits destruction or removal of any active nest of a migratory bird. The 2011 FEIR indicates that the scope of the proposed project (Tier I and Tier II) is not expected to have an effect on nesting birds in the area. Therefore, the 2011 FEIR indicates that there would be no impacts to biological resources related to impeding the use of native wildlife nursery sites.

The proposed BHC would result in the same impacts as identified in the 2011 FEIR. The BHC would include removal of existing landscaping, including potentially a number of large ornamental trees, and replacing it with new landscaping including the new gardens that would provide additional ornamental trees on-site. The design of the new gardens has yet to be determined so the number of trees to be removed/added is unknown at this time.

Consistent with the 2011 FEIR, the BHC would continue to result in no impacts to biological resources related to species listed as sensitive, locally important, rare, threatened, or endangered, nor would there be impacts to wetlands or riparian communities. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(e) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concluded no impacts with respect to ordinances protecting biological resources. The BHC site includes the Hawkins Building sunken garden which contains a number of ornamental trees of varying sizes. None of these trees are protected. Therefore, consistent with the 2011 FEIR, the proposed BHC would not result in impacts to biological resources in relation to conflicts with any local policies or ordinances protecting biological resources. Development on the MLK Campus (including the proposed BHC) would not interfere with or impact biological resources. Therefore, there would be no expected impacts to biological resources related to conflicts with any local policies or ordinances protecting biological resources. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(f) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As indicated in the 2011 FEIR, the CDFW's National Community Conservation Planning (NCCP) program, the only NCCP region within the County is the Palos Verdes Peninsula NCCP. There are no proposed or adopted NCCPs or Habitat Conservation Plans (HCPs) that applies to the project site. The 2011 FEIR concluded no impact with respect to adopted approved conservation plans. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

E. CULTURAL RESOURCES

The potential for the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) to result in new or substantially more adverse significant impacts to cultural resources was evaluated in relation to the 2011 FEIR and four questions recommended for consideration by the State CEQA Guidelines.

(a) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of a historical resource as defined in §15064.5?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Five historical resources, the Martin Luther King, Jr. Medical Center Campus Historic District and four contributing buildings, are located on the proposed project site. (Historical resources in a historic district consist of individual contributors to the district plus the district itself.) A total of 21 buildings are located on the MLK Campus. The 2011 FEIR indicates that four of these buildings appear to meet the criteria for listing in the National Register of Historic Places (NRHP) and the California Resources Historic Register (CRHR) as contributors to a potential Martin Luther King, Jr. Medical Center Campus Historic District (California Historical Resources Status Code [CHR] 3D). The four buildings are: Multi-Service Ambulatory Care Center (MACC), Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building and Dr. H. Claude Hudson Auditorium (Hudson Auditorium).

In addition to the four historic buildings, the 2011 FEIR indicates that the Historic District contains seven character-defining appurtenant elements:

- Elongated lawn located east of the MACC, which is bounded by a primary entrance road
- Sunken garden and walled courtyard located south and west of the Augustus F. Hawkins Comprehensive Mental Health Center.
- Walled courtyard and recreation area located south of the Interns and Physicians Building.
- Drop-off area located north of the Interns and Physicians Building and west of the
- North Support Building Pedestrian walkway extending from the MACC's east facade to the Dr. H. Claude Hudson Auditorium.
- Pedestrian walkway extending from the north elevation of the MACC to the Augustus F. Hawkins Comprehensive Mental Health Center.

- Pedestrian walkway extending from the east facade of the Interns and Physicians Building to the MACC.

The 2011 FEIR describes the original MACC as follows:

The MACC is a significant contributing building of the Martin Luther King, Jr. Medical Center Campus Historic District. The MACC was constructed as the primary component of the Martin Luther King, Jr. Medical Center Campus, which was built as a direct response to the findings of the McCone Commission that was organized to examine the causes of the 1965 civil unrest that began in nearby Watts. The McCone Commission found that South Los Angeles was severely lacking in access to medical services and recommended the immediate construction of a comprehensive hospital to remedy the stark disparities in the availability of health care services between South Los Angeles and the rest of the City of Los Angeles. Located at the far west end of a large grassy lawn, the MACC occupies a commanding location within the site, conveying the prominence of its hospital function to visitors entering the facility from the property's main entrance at Wilmington Avenue. The building is a highly characteristic example of the Brutalism style. The Brutalism style, considered easy to construct and maintain, was a popular choice for government, civic and institutional buildings during the 1960s and 1970s and thus use of Brutalist architecture reflects the building's public function and era of construction.

Landscape elements, including the central lawn crossed by a single paved sidewalk, an allée of tall palms to the south of the property, and ornamental trees and shrubs located along the building's primary façade, serve to further emphasize the building's role as the primary care facility of the Martin Luther King, Jr. Medical Center Campus.

The three pedestrian walkways associated with the MACC (consisting of a low- covered walkway extending from the MACC's east façade to the Dr. H. Claude Hudson Auditorium, an elevated walkway constructed of reinforced concrete, providing pedestrian access from the MACC to the Augustus F. Hawkins Comprehensive Mental Health Center, and a walkway extending from the west elevation of the MACC, constructed of reinforced concrete columns, and traversing past several medical campus buildings before terminating at the Dr. Julius W. Hill Interns and Physicians Building), contribute to the property's architectural and functional character.

The 2011 FEIR identifies the MACC as having the following character-defining features:

- Ample use of concrete (e.g., vertically striated concrete supports and exterior framing)
- Monolithic massing
- Geometric repetition (e.g., the plan configuration consisting of three identical towers, repetitive bands of windows, and a series of balconies located on the building's façade)
- Recessed primary entrance with deeply cantilevered canopy
- Minimal ornamentation
- Overall simplicity of form
- Original landscaping (elongated central lawn crossed by a single path)

The 2011 FEIR describes the Hawkins Building and associated landscaping as follows:

Brutalism style buildings, considered easy to construct and maintain, were widely popular for government, civic and institutional buildings built during the 1960s and 1970s, and thus use of Brutalist architecture reflects the building's public function. The building's unusual

massing, weighted upwards, incorporates elements of the Brutalism style in its ample use of reinforced concrete with striated unfinished detailing, small recessed fixed tinted windows, general appearance of solidity, and lack of ornamentation.

Landscape elements include a low planter wall that extends along the building's north facade and continues beyond the building to the west, consisting of a thickly planted assortment of compact trees, ornamental shrubs, and landscape plantings, which contribute to the architectural and functional character of the property. An entrance located on the building's south elevation is accessed via a pedestrian bridge that passes over a sunken garden containing numerous examples of evergreens and ornamental vegetation.

To the west, the sunken garden transitions into a landscaped recreational area with a swimming pool, handball courts, and a small playground.

The 2011 FEIR identifies character-defining features of the Hawkins Building as follows:

- Ample use of concrete with vertically striated, unfinished detailing
- Monumental horizontal massing with overhanging upper floor
- Small, recessed, fixed, tinted windows
- Recessed primary entrance
- Elevated pedestrian walkway extending from south elevation to the MACC
- Original landscaping (walled courtyard with pathways, sunken garden along south elevation, low planter wall along north facade)

The landscaped recreational area with a swimming pool, handball courts, and a small playground were removed as part of Tier I and construction of the new MACC.

Previously, adopted Mitigation Measures Cultural-3 through Cultural-5 would apply to the project. Mitigation Measure Cultural-3, requires use of the Secretary of the Interior's Standards for the treatment of Historic Properties with Guidelines of Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; Mitigation Measure Cultural-4, requires that for any non-conformance with these standards, archival quality photo-documentation of resources, and Mitigation Measure Cultural-5, requires that impacts to loss of integrity of the Historic District be addressed through development of a retrospective exhibit detailing the history of the Martin Luther King, Jr. Medical Center Campus Historic District.

The 2011 FEIR addressed potential impacts of entirely removing the five historical resources identified above. The impact of removing any one or more of these resources was identified as significant after application of mitigation measures. The demolition of the Hawkins Building would result in loss of one of the four identified historic buildings and would therefore be a significant impact due to loss of the building and the impact on the MLK Campus Historic District. The gardens associated with the Hawkins Building would be retained but reconfigured to suit the needs of the programs within the BHC (the design of these gardens has not yet been determined so the number of trees to be removed is unknown).

The proposed renovation of the original MACC would impact (but not remove) one of the character-defining features of the MLK Medical Center Campus Historic District. The building would remain in its existing configuration, the exterior of the building would be cleaned and potentially a treatment would be applied. The interior of the building would be reconfigured. Design of the renovation has not yet been completed and therefore it is not possible to determine whether the renovation would comply with the Secretary of the Interiors Standards.

Therefore, the impact to the original MACC and the impact to the MLK Campus Historic District could still be significant (although less than anticipated in the 2011 FEIR). An architectural historian will be part of the design team to ensure that character-defining historic fabric is retained to the extent feasible.

The renovation of the original MACC and demolition of the Hawkins Building are both within the scope of impacts previously analyzed in the 2011 FEIR. The 2013 Master Plan (which the Board of Supervisors found to be within the scope of the 2011 FEIR) entirely removed both the original MACC and the Hawkins Building, although renovation of the original MACC was identified as an option.

As noted in the Introduction to this Addendum, as part of the approval of the MLK Medical Center Campus Redevelopment Project the Board of Supervisors adopted Findings of Fact and a Statement of Overriding Considerations that identified potential impacts, mitigation measures and alternatives. The Statement of Overriding Considerations indicates that “[t]he project may result in impacts from the significant alteration or removal of structures or character-defining features that may be identified as historic resources.” The Statement of Overriding Considerations outlines the benefits of the MLK Medical Center Campus Redevelopment Project and indicates that, “[t]he cultural resources significant impacts are overridden by the project’s ability to provide new campus improvements and to reopen a fully functional medical campus that meets the community needs for quality health care and establishes the Martin Luther King, Jr. Medical Center Campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce development, academic research and teaching, and economic development.

The County reviewed each of four historical buildings on the campus as well as character defining appurtenant elements and has proceeded with adaptive reuse of the buildings and retention of appurtenant elements as feasible and appropriate:

- The Interns and Physicians building was renovated and adaptively reused as a recuperative care center.
- The Hudson Auditorium is in the process of being renovated and expanded to adaptively reuse the building as a childcare center.
- It is proposed that the MACC be adaptively reused for the new Behavioral Health Center.
- The MLK Historic District is comprised of the four historic buildings -- three of which have been or are in the process of being substantially retained (see above). The historic district also includes landscaping and walkways -- the iconic large green space and main driveway in front of the original MACC is being reconfigured but substantially retained.

Therefore, three of the four historic buildings on the MLK campus are already or are proposed to be substantially adaptively reused and substantial components of historic landscaping and pathways are being retained.

The County considered the feasibility of adaptive reuse of the Hawkins Building and determined that it was not feasible primarily due to 1) its size, and 2) lack of windows and light and air. The poor design and layout of the interior, the location of the building, the general condition of the

building, as well as the necessity of the site to be used for required programs (gardens and parking) all contribute to the determination that it is infeasible to retain the Hawkins Building.¹

As compared to the 2013 Master Plan and contemplated potential for complete removal of the original MACC in the 2011 FEIR, the proposed renovation would reduce but not eliminate potentially significant impacts to that building and the MLK Campus Historic District. Demolition of the Hawkins Building would be a significant impact to the building and the MLK Campus Historic District. These changes would not cause additional impacts (impacts to the original MACC would be reduced as it would not be demolished) and no additional mitigation is necessary. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(b) Would the proposed BHC cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		
(c) Would the proposed BHC directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		
(d) Would the proposed BHC disturb any human remains, including those interred outside of formal cemeteries?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ably to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates that the project site has been substantially disturbed, but that new excavation exceeding 20 feet in depth has the potential to impact native soils. The proposed renovation of the original MACC would require no excavation. Demolition of the Hawkins Building and reconfiguration of the gardens and construction of a surface parking lot would require minimal excavation. The 2011 FEIR provides mitigation measures for excavation below a depth of 15 feet.

A records search conducted as part of the 2011 FEIR for the MLK Campus indicated that all, or portions of, 28 previous archaeological and/or historic architectural surveys have been conducted within 1 mile from the Campus. No archaeological surveys have been conducted on the MLK Campus. Two prehistoric burials and two historic archaeological sites have been recorded within 1 mile of the MLK Campus. No known prehistoric or historic archaeological sites have been recorded on the project site. No mitigation measures were identified as necessary in the 2011 FEIR to ensure impacts remain below a level of significance. The same conclusion is valid for the BHC as it falls within the scope of anticipated development on the Campus.

The 2011 FEIR indicates that the closest known fossil localities have been identified west of the proposed project site in the Athens vicinity around the Harbor Freeway (I-110), from north of Imperial Highway to near El Segundo Boulevard. These localities produced Late Pleistocene fossil specimens of pond turtle (*Clemmys*), puffin (*Mancalla*), turkey (*Parapova*), ground sloth

¹ Martin Luther King Jr. Medical Center Campus Redevelopment Project, Reuse of Historic Buildings and Hawkins Building Demolition, July 2018

(Paramylodon), mammoth (Mammuthus), dire wolf (Canis dirus), rabbit (Sylvilagus), squirrel (Sciuridae), deer mouse (Microtus), pocket gopher (Thomomys), horse (Equus), deer (Cervus), pronghorn antelope (Capromeryx), and bison (Bison) at depths as shallow as 15 feet below the surface.

Previously adopted mitigation of paleontological resource impacts included in the 2011 FEIR, to address the potential for encountering paleontological resources, would reduce impacts to below a level of significance through the requirement to fully recover paleontological resources from the area of potential effect in accordance with standards for such recovery established by the Society of Vertebrate Paleontology. Therefore, consistent with the analysis and conclusions of the 2011 FEIR, Mitigation Measure Cultural-1 would continue to reduce impacts related to the destruction of unique paleontological resources or unique geologic features below the level of significance.

Mitigation Measure Cultural-1 requires that prior to any ground-disturbing activities, the County of Los Angeles create a site plan indicating all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Construction monitoring by a qualified paleontological monitor is required during all ground-disturbing activities that could affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet must stop until a qualified paleontologist assesses the find.

There are no formal cemeteries on the property, and the ground has been substantially disturbed for the construction of the Martin Luther King, Jr. Medical Center Campus. A record search with the Native American Heritage Commission failed to indicate the known presence of Native American sacred sites, including burial sites, on or within a ½-mile radius of the proposed project site. Therefore, the proposed project would not be expected to disturb any human remains, including those interred outside of formal cemeteries. Consistent with the findings of the 2011 FEIR, implementation of Mitigation Measure Cultural – 2 would ensure that this impact remains less than significant. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

F. GEOLOGY AND SOILS

Impacts to geology and soils of the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) were evaluated with regard to the 2011 FEIR including adopted mitigation measures. The potential for the proposed BHC to result in new or substantially more adverse significant impacts to geology and soils was evaluated in relation to eight questions recommended for consideration by the State CEQA Guidelines.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the Project Area. Analysis of the Appendix G questions in this impact analysis will apply to the decision from *CBIA v. BAAQMD*. The

following analysis recaps the 2011 FEIR for informational purposes, but potential impacts of the environment on a project are no longer considered potentially significant.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Expose people or structures to 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.		
ii) Strong seismic ground shaking?		
iii) Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction?		
iv) Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?		
(b) Result in substantial soil erosion or the loss of topsoil?		
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed ordinance, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?		
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates that development on the project site would be expected to result in less than significant impacts related to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault and strong seismic shaking. There are no known surface faults within the MLK Campus, and the proposed project location does not lie within an Alquist-Priolo Earthquake Fault Zones (APEFZ). The project site is located approximately 1.8 miles northeast of the Newport-Inglewood Alquist-Priolo Fault Zone. The project site is roughly 42 miles south of the active San Andreas Fault. The 2011 FEIR indicates that conformance to applicable requirements under the California Building Code (CBC) and Uniform Building Code (UBC) would reduce impacts related to the rupture of a surface fault to the maximum extent possible under current engineering practices.

The overall MLK Medical Campus site is located within a liquefaction zone. A site-specific liquefaction analysis was performed for the East Campus Parking Structure site. That site is primarily underlain by mixture of clayey soil and sandy soils with relatively high fines contents, which have low liquefaction potential, the likelihood of liquefaction is considered low. The 2011 FEIR concludes less than significant impacts with respect to strong groundshaking and seismic-related ground failure including liquefaction.

The 2011 FEIR summarizes the California Geological Survey, that indicates that the project site is located within a Seismic Hazard Zone for liquefaction, which indicates a potential for permanent ground displacements such that mitigation, as defined in Public Resources Code Section 2693(c), would be required. The 2011 FEIR indicates that compliance with Office of Statewide Planning and Development (OSHPD) standards would further reduce any potential for impacts resulting from liquefaction.

The 2011 FEIR concludes a less than significant impact related to landslides. The topography of the project site and surrounding area is generally flat, and therefore would pose no potential risk for landslides to occur. Moreover, no areas susceptible to seismic-induced landslides are shown in the proposed project vicinity on the USGS 7.5-minute series South Gate topographic quadrangle. Due to the absence of steep slopes, there would be no expected impacts from exposing people or structures to potentially substantial adverse effects involving landslides.

The proposed BHC would not exacerbate existing conditions with respect to rupture of a known earthquake fault, liquefaction conditions or slopes. No additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

The 2011 FEIR concludes less than significant impacts with respect to soil erosion and loss of topsoil and impacts associated with being located on expansive soils (Mitigation Measures Geology-1 through Geology-3).

The proposed demolition of the Hawkins Building and reconfiguration of the gardens could result in impacts related to soil erosion and loss of topsoil, such impacts would be reduced to below the level of significance with implementation of best management practices (BMPs) consistent with the guidelines provided in the California Storm Water Best Management Practice Handbooks: Construction. Impacts related to soil erosion or the loss of topsoil would be reduced to below the level of significance by the incorporation of Mitigation Measures Geology-1 through Geology-3.

The proposed project would not have the potential to exacerbate conditions related to being located on a geologic unit or soil that is unstable, or that would become unstable and/or being located on expansive soils. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

The 2011 FEIR concluded no impact with respect to soils incapable of supporting septic tanks. The proposed project would not result in impacts to geology and soils in relation to being located on 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. The proposed project would not require the use of septic tanks or alternative wastewater disposal systems. The original MACC is connected to existing sewers. Wastewater generated at the project site is treated at the Hyperion Treatment Plant. The Hyperion Treatment Plant is the largest wastewater treatment plant in the City of Los Angeles and is anticipated to have the capacity to support the entire Tier II MLK Campus Redevelopment Project. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

G. GREENHOUSE GAS EMISSIONS

Greenhouse gas emissions associated with the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) were evaluated based on a review of the 2011 FEIR and the required mitigation measures. The potential for the proposed BHC to result in new or substantially more adverse significant impacts related to greenhouse gas emissions was evaluated in relation to two questions recommended for consideration by the State CEQA Guidelines.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment		
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates that, conservatively, the proposed development of the MLK Medical Center Campus would result in significant GHG emissions as a result of building construction, operation and vehicle trips which would be inconsistent with State and regional plans focused on reducing greenhouse gas emissions. The proposed BHC would a variety of mental health facilities in one location, allowing for coordination of many different programs.

The proposed project would generate GHG emissions associated with construction and operation of the building (mainly associated with lighting). While staff of the BHC would generate new trips, trips from the BHC together with other Tier II projects proposed and completed to date would not yet exceed existing trips identified in the 2011 FEIR. But eventually on completion of Tier II, trips are anticipated to substantially exceed existing conditions identified in the 2011 FEIR.

The 2011 FEIR identified a total net increase of 19,677 new daily vehicle trips as a result of the proposed Master Plan. As part of the buildout proposed for the approved Tier II project, the proposed BHC would contribute to the significant GHG emissions identified in the 2011 FEIR. The proposed BHC would be within the assumptions of the 2011 FEIR and therefore would not generate additional impacts. Compliance with Mitigation Measure GHG-1 would reduce emissions and ensure sustainable development to the extent feasible. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

H. HAZARDS AND HAZARDOUS MATERIALS

Hazards and hazardous materials of the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) were evaluated based on a review of the studies included in the 2011 FEIR and impacts were evaluated compared to impacts of the 2011 FEIR and the required mitigation measures.

Hazardous waste can pose a potential or substantial hazard to human health or the environment when improperly managed. Designated hazardous waste possesses at least one of four defined characteristics—ignitability, corrosivity, reactivity, or toxicity—or appears on special U.S. Environmental Protection Agency lists. The potential for the proposed BHC to result in new or substantially more adverse significant impacts related to hazards and hazardous materials was evaluated in relation to eight questions recommended for consideration by the State CEQA Guidelines.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		
(b) 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?		
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		
(d) 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?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates that with Mitigation Measures Hazards-1 through Hazards-5, the entire proposed Tier II MLK Campus Redevelopment Project would result in less than significant impacts with respect to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The original MACC was constructed in the early seventies and contains some asbestos containing materials and lead-based paints; Mitigation Measure Hazards-2 requires that for buildings constructed before 1979, such materials be identified and removed properly in accordance with applicable regulations. The proposed renovation of the original MACC would involve the use of minimal hazardous materials. Demolition and renovation activities would include standard cleaning materials, lubricants, and oils.

Because it is a hospital, the entire campus is registered as a small- and large-quantity generator of hazardous materials such as waste oil and mixed oil; oxygenated solvents including acetone, butanol, and ethyl acetate; spent halogenated solvents; and other hazardous materials including batteries, lamps, pesticides, thermostats, mercury, and silver. The hospital may also deal with biomedical and radiological wastes. However, there are specific government regulations restricting the transport, use, and disposal of these hazardous materials, and the Tier II MLK Campus Redevelopment Project would not entail use of such materials beyond regulated parameters.

The BHC would use minimal amounts of hazardous materials typically used in hospitals, and residences such as certain cleaning supplies (e.g. bleach). Consistent with the analysis and conclusions of the 2011 FEIR, the proposed BHC, with implementation of required Mitigation Measures Hazards-1 through Hazards-5, would result in less than significant impacts related to creating a significant hazard to the public or the environment through the routine transport, use,

or disposal of hazardous materials. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

The 2011 FEIR indicates that the MLK Campus is the location of documented past releases of gasoline and oil from leaking underground storage tanks (LUSTs), which occurred prior to existing underground storage tank (UST) regulations. Cleanup of the campus has been completed for the release of oil and gasoline, and no further action is warranted. Because the project site is both a small- and a large-quantity generator of hazardous materials, the potential exists for a hazardous materials release to occur.

Any tank relocations would be conducted according to the following applicable federal and state regulations related to tank management: Code of Federal Regulations (CFR) 40, Part 112; 40 CFR, Part 280; CFR 281; 40 CFR, Part 282; and the California Code of Regulations (CCR) Title 22 and Title 23 Regulations. It is unlikely that the proposed project would result in accidental leaks and spills that would affect the public or the environment. Therefore, consistent with the analysis and conclusions of the 2011 FEIR, with implementation of required Mitigation Measures Hazards-1 through Hazards-5, the proposed BHC would result in less than significant impacts related to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous material, and with respect to the emission of hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

Due to the nature of the hospital use of the campus, it is included on multiple environmental regulatory databases for permitted Underground Storage tanks (USTs) and Leaking Underground Storage Tanks (LUSTs). A LUST on the MLK Campus involved an unauthorized release of gasoline, which affected soil. Cleanup of the LUST was completed, and the case was closed by the Regional Water Quality Control Board in 1996. Therefore, this LUST would not result in impacts to people or the environment.

An additional release of 14,000 gallons of oily water occurred on the campus in 2006 due to a ruptured pipe coming from the on-site power plant. The substance was pumped into tanker trucks and cleanup was nearing completion when the 2011 FEIR was prepared. No significant impact to people or the environment occurred as a result of this release. This release was reported through the California Hazardous Material Incident Reporting System (CHMIRS) database.

The MLK Campus is included on a list of Resource Conservation and Recovery Act (RCRA) small quantity generators (SQGs), but no violations have been reported. The proposed project site is also listed under the Hazardous Waste Information System (HAZNET) because it disposes waste oil and mixed oil, paint sludge, inorganic solid waste, oxygenated solvents, polychlorinated biphenyls (PCBs), mercury waste, and asbestos-containing waste. In addition, the proposed project site is considered an RCRA large-quantity generator (LQG) of waste products such as batteries, lamps, pesticides, thermostats, mercury, silver, halogenated solvents, as well as other ignitable and corrosive hazardous materials. However, no violations were identified.

Three LUST sites are located within 0.5-mile up-gradient of the project site and have undergone/are undergoing remediation and are not expected to impact the project site. No violations have been reported for these LUST sites. The Phase I ESA for the East Campus

Parking Structure identified the potential for trace elements of petroleum hydrocarbons and metals and the potential for pesticide residue from past agricultural use on the site (which could also be true for the Hawkins Building site). The Phase II ESA collected and analyzed 27 soil samples at depths of 1, 5 and 10 feet below ground surface, and identified the following:

- In 17 samples (at varying depths), arsenic was detected above the screening level but below the accepted background level. To ensure worker safety, compliance with applicable regulations as well as standard Best Management Practices (BMPs) including dermal coverage (gloves, long pants) would be required for soil management and disposal during construction activities.
- One sample (at a depth of one foot) contained lead concentrations above regulatory disposal limits.
- Two samples (at a depth of one foot) contained pesticides above regulatory disposal limits.

Soils contaminated with lead and pesticide above regulatory limits are required to be tested and disposed of in accordance with applicable regulations. The Phase II ESA recommended that shallow soils (less than five feet) generated in the areas of lead and pesticide exceedances be segregated during stockpiling for proper disposal. To ensure proper handling of contaminated soils (in accordance with applicable regulations), a soils management plan would be implemented by a qualified contractor as appropriate, to perform excavation, soil profiling, and transportation and disposal.

Consistent with the analysis and conclusions of the 2011 FEIR, the proposed BHC, with implementation of required Mitigation Measures Hazards-1 through Hazards-5, would result in less than significant impacts related to location on a hazardous waste site. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(e) Be 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 for people residing or working in the project area?		
(f) Be located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?		
(g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		
(h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates development on the project site would not be expected to result in impacts from hazards and hazardous materials in relation to proximity to an airport or private airstrip, and the creation of safety hazards for people residing or working in the proposed project

area. The nearest airports are the Compton Airport, located at 901 West Alondra Boulevard in the City of Compton, approximately 2.1 miles south; the Saint Francis Medical Center Heliport in the City of Lynwood, approximately 2.7 miles east; the Gardena Valley Airport in the City of Gardena, approximately 4 miles southeast; and the Hawthorne Municipal Airport in the City of Hawthorne, approximately 4.6 miles west of the proposed project site. The nearest private airstrip is located in Playa Vista at 5510 Lincoln Boulevard, approximately 11.5 miles northwest of the proposed project site. The proposed MLK Campus Redevelopment Project would improve the safety of the existing hospital helipad facilities; no change in impacts involving this helipad would occur. Consistent with the 2011 FEIR analysis and conclusions, the proposed BHC would not be expected to result in significant impacts from hazards and hazardous materials in relation to proximity to an airport or private airstrip and the creation of safety hazards for people residing or working in the proposed project area. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

The purpose of the MLK Campus Redevelopment Project is to improve conditions related to healthcare services. Consistent with the analysis and conclusions of the 2011 FEIR, the BHC would not interfere with an emergency response plan or evacuation plan and would therefore not result in significant impacts related to impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

As indicated in the 2011 FEIR, the MLK Campus is located in an urban environment without adjacent or nearby wildlands. In addition, the campus is not considered to be in a fire hazard severity zone. Consistent with the analysis and conclusions of the 2011 FEIR (Initial Study), the BHC would not result in significant impacts related to exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

I. HYDROLOGY AND WATER QUALITY

Hydrology and water quality impacts of the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) were evaluated in relation to the 2011 FEIR and required mitigation measures. The potential for the proposed BHC to result in new or substantially more adverse significant impacts related to hydrology and water quality was evaluated in relation to 10 questions recommended for consideration by the State CEQA Guidelines.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the Project Area. Analysis of the Appendix G questions in this impact analysis will apply to the decision from *CBIA v. BAAQMD*. The following analysis recaps the 2011 FEIR for informational purposes, but potential impacts of the environment on a project are no longer considered potentially significant.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Violate any water quality standards or waste discharge requirements?		
(b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes that construction could result in erosion, sediment-laden runoff, and discharge of non-storm water runoff. Mitigation would be required to reduce impacts to water quality and groundwater recharge below a level of significance.

With implementation of the adopted mitigation measures, the proposed BHC, including demolition of the Hawkins Building and construction of new gardens and a surface parking lot would result in less than significant impacts with respect to violating any water quality standards or waste discharge requirements. The proposed project would entail both construction and operational elements. The demolition of the Hawkins Building and subsequent site clearing could contribute to erosion, sediment-laden runoff, discharge of non-storm water runoff, or other water quality–related events. All construction activities would include implementation of best management practices (BMPs) to reduce or eliminate non-storm discharges to the storm water system. Implementation of BMPs would result in meeting the water quality standards set forth by responsible agencies, and would address storm runoff quantity and flow rate, suspended solids (primarily from erosion), and contaminants such as phosphorus and hydrocarbons. BMPs would be incorporated in accordance with the NPDES permit issued to the County by the LA-RWQCB, the County Storm Water Management, and the County General Plan. With implementation of Mitigation Measures Hydrology-1 through Hydrology-4 and Hazards-1, the proposed BHC (together with other completed Tier II projects) would result in less than significant impacts in relation to violating any water quality standards or waste discharge requirements.

The 2011 FEIR indicates that the MLK Campus is located within the Central Basin Municipal Water District. Groundwater has been encountered on the campus at approximately 38 to 52 feet below ground surface. The MLK Campus and its existing uses do not influence the local groundwater basin, and the site does not serve as a groundwater recharge site. Further, neither Tier I nor Tier II of the MLK Campus Redevelopment Project would use groundwater supplies or interfere with groundwater recharge into this basin. Therefore, consistent with the 2011 FEIR, the proposed BHC would not result in impacts to groundwater. There is no potential for the BHC to contribute to the depletion of groundwater supplies or to create substantial interference with groundwater recharge for the area. Consistent with the 2011 FEIR, the proposed BHC would not result in impacts to hydrology and water quality in relation to groundwater supplies or groundwater recharge. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?		
(d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		
(e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?		
(f) Otherwise substantially degrade water quality?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates that development on the project site would not be expected to result in impacts to hydrology and water quality in relation to alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on or off site. The proposed BHC would not substantially alter the existing drainage pattern of the site or area or alter the course of any existing streams or rivers in the proposed project area. While the demolition of the Hawkins Building and reconfiguration of associated gardens would result in the removal of vegetated areas, it would result in the addition of landscaped areas that would likely increase pervious surfaces. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

The 2011 FEIR concludes less than significant impacts with mitigation with respect to potential impacts on water quality (Mitigation Measures Hydrology 1 through Hydrology-4 and Hazards-1). The BHC would result in reuse of an existing building and development of new gardens and a surface parking lot. The entire area has been previously disturbed. The project would be required to comply with Mitigation Measures Hydrology-1 through Hydrology-4 and Hazards-1 as well as BMPs consistent with guidelines provided in the California Storm Water Best Management Practices Handbook for Construction Activities and in the Los Angeles County Storm Water Management Program for substantiated erosion or siltation. Consistent with the 2011 FEIR, the proposed BHC (together with Tier II projects completed to date) would result in less than significant impacts with mitigation related to drainage patterns, erosion, siltation and degradation of water quality. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

The 2011 FEIR concludes no impact to altering existing drainage patterns. There are no existing drainage patterns on or within the vicinity that would be substantially impacted by the proposed project. The MLK Campus is part of the Los Angeles storm drain system and the County of Los Angeles Department of Public Works has implemented measures to initiate storm water pollution reduction programs throughout the County. The project together with other development completed to date on the MLK Campus would not be expected to contribute substantial additional runoff as the project together with completed would not substantially increase impervious surfaces. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?		
(h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?		
(i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?		
(j) Inundation by seiche, tsunami, or mudflow?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concluded no impact with respect to placing housing within a 100-year flood hazard area. As indicated in the 2011 FEIR, the MLK Campus is not located within a 100-year or 500-year flood zone. Therefore, there would be no expected impacts to hydrology and water quality related to placement of housing within a 100-year flood hazard area. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

The 2011 FEIR concludes no impact with respect to placing structures in a 100-year flood hazard area, exposing people or structures to significant risk or loss as a result of failure of a dam or levee. As indicated in the 2011 FEIR, the County of Los Angeles maintains over 15 major dams and a host of other flood control facilities such as spreading grounds within the County. The flood control facilities within the MLK Medical Campus vicinity are maintained by the County Flood Control District and are in compliance with local, state, and federal regulations. The 2011 FEIR indicates that development on the MLK Campus would have no impacts on, nor be impacted by, the operation of the existing levees or dams. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

The 2011 FEIR concludes no impact with respect to seiche, tsunami and mudflow. Tsunamis are tidal waves generated in large bodies of water in response to ground shaking. The elevation of the campus ranges from approximately 85 feet above mean sea level (MSL) to 105 feet above MSL. As indicated in the 2011 FEIR, the campus is roughly 10 miles east of the Pacific Ocean. Due to the elevation of the project area and its distance from the ocean and other bodies of water, there would be no direct or indirect impacts related to seiches or tsunamis. A mudflow is a large flow of mud resulting from soil saturation on steep slopes. The campus is not located in a section of the County that is susceptible to mudslides and there are no steep slopes with soils or vegetation on or immediately adjacent to the campus. Consistent with the analysis and conclusions of the 2011 FEIR, the proposed BHC would not be expected to result in impacts in relation to the inundation by seiche, tsunami, or mudflow. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

J. LAND USE AND PLANNING

Land use and planning impacts of the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) were evaluated in light of the 2011 FEIR. The potential for the proposed BHC to result in new or substantially more adverse significant impacts related to land use and planning was evaluated in relation to three questions recommended for consideration by the State CEQA Guidelines.

(a) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the potential to physically divide an existing community?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes no impact with respect to dividing an established community. Physical division of an established community typically occurs when linear elements such as train tracks or a new highway separates parts of the community. No such elements would occur with the proposed BHC. As indicated in the 2011 FEIR, development of the MLK Medical Center Campus would not extend development beyond the existing medical facility site and, therefore, would not cause a physical division within the established community. The proposed BHC would be a continuation of medical and medical-related uses on the existing Medical Center Campus, and consistent with the analysis and conclusions of the 2011 FEIR there would be no expected impacts to land use and planning resulting in a physical division to the established community. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(b) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes less than significant impact with respect to conflicts with an applicable plan. The proposed BHC would result in reuse of an existing building, reconfiguration and expansion of existing gardens and creating of surface parking (280 spaces). As indicated in the 2011 FEIR, the General Plan designates the MLK Medical Center Campus for Public and Semi-Public land use (P), which provides for activities by public and quasi-public entities and allows for the establishment of facilities, infrastructure, and their related operations in these areas that are public or semipublic in nature, including hospitals. As such, use of the campus as a medical facility is in conformance with this land use designation. As indicated in the 2011 FEIR, the County zoning designation for all parcels within the MLK Campus is

Neighborhood Commercial (C-2; Neighborhood Business Zone). This zoning designation is established to identify community-related commercial uses and permits the following uses: drugstores, medical clinics (including laboratories), professional or business office space, parking lots and buildings, and hospital equipment and supply rentals.

As indicated in the 2011 FEIR, the County has established development standards for the Neighborhood Business Zone:

No more than 90 percent of the net area can be occupied by buildings, with a minimum of 10 percent of the net area landscaped with a lawn, shrubbery, flowers, and/or trees, which shall be continuously maintained in good condition. Incidental walkways, if needed, may be developed in the landscaped area; that there be parking facilities as required by Part 11 of Chapter 22.52; and that a building or structure shall not exceed a height of 35 feet above grade, excluding signs which are permitted by Part 10 of Chapter 22.52 (such as chimneys, and rooftop antennas).

The zoning classification for C-2 does not have a set-back requirement. The County indicated in the 2011 FEIR Initial Study, “[t]he County would seek to ensure compatibility of the proposed project with the existing campus and its surroundings but reserves the right to exempt elements of the proposed project from the zoning designation. Therefore, the proposed development would not conflict with the permitted uses of this zoning designation, and no General Plan amendment or zone change would be required. Therefore, with respect to the proposed BHC, consistent with the analysis and conclusions of the 2011 FEIR impacts to land use and planning related to a conflict with adopted or proposed land use plans, policies, or regulations would be less than significant. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(c) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes no impact with respect to conflicts with habitat conservation planning. As evaluated in the 2011 FEIR, the project site is located in a densely populated urban setting and no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan are applicable to the project area. Consequently, the proposed BHC would not have an impact on any such plans consistent with the analysis and conclusions of the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

K. MINERAL RESOURCES

The potential for the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) to result in new or substantially more adverse significant impacts to mineral resources was evaluated in relation to the 2011 FEIR and two questions recommended for consideration by the State CEQA Guidelines.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?		
(b) 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?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates that development on the MLK Campus is not expected to result in impacts to mineral resources in relation to the loss of availability of a known mineral resource and concludes no impact with respect to mineral resources. The 2011 FEIR summarizes the California Geological Survey report and indicates that there are no known mineral resources of statewide or regional importance produced within the proposed project site. According to the Mines and Minerals Producers Active in California (1977–1998), the County of Los Angeles contains 25 active mines. However, there are no mining districts located in or around the vicinity of the project site. Therefore, there would be no expected impacts to mineral resources related to the loss of availability of a known mineral resource. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

L. NOISE

The potential for the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) to result in new or substantially more adverse significant impacts related to noise was evaluated in relation to the 2011 FEIR and six questions recommended for consideration by the State CEQA Guidelines.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		
b) Exposure of persons to or generation of excessive groundborne vibration or noise levels?		
(b) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?		
(d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates that an increase of 4 dBA CNEL or more would result in a significant adverse impact. (CNEL is a 24-hour noise descriptor that averages noise over a 24-hour period and artificially adds a decibel increment to noise that occurs in the evenings and at night). In the 2011 FEIR, the measured ambient noise levels in the neighborhood south of the project site during peak afternoon hours is indicated to be 55.2 dBA.

Demolition/Construction/Renovation

Project demolition, site preparation, construction and renovation activities would be typical of such activities and would be within the assumptions made in the 2011 FEIR. Demolition activities associated with the Hawkins Building would be shielded from single-family homes to the south, educational facilities to the north are more than 300 feet from the site. Construction vehicle activity on the emergency access road would result in elevated noise levels at the single-family residences. Demolition, site preparation, and renovation activities would be within the assumptions identified in Table 3. Construction is not allowed between 8:00 pm and 7:00 am Monday through Friday or anytime on Sunday. Saturday construction could occur between 7:00 am and 5:00 pm.

Anticipated construction noise at 50 feet is shown in Table 5 (reproduced from the 2011 FEIR – FEIR Table 3.8.4.2-1, page 3.8-10). Residential uses within 80 feet of a construction site are identified in the 2011 FEIR as significantly impacted (with mitigation). The original MACC is about 60 feet from single-family homes to the south, any sandblasting of the southern façade of the original MACC could result in a brief period of noise levels similar to those shown in Table 5.

Implementation of Mitigation Measures Noise-1 through Noise-3 (which require noise muffling devices, barriers/curtains, vehicle maintenance and use of sonic piles within 55 feet of residences) would reduce noise as feasible. Nonetheless, the noise generated by sandblasting and potential application of treatments to the building exterior could briefly exceed County construction noise thresholds at sensitive receptors to the south. Such activities are reasonably expected renovation activities within the scope of activities analyzed in the 2011 FEIR. The majority of construction activity would not be expected to exceed thresholds at sensitive receptors. No additional mitigation is feasible or necessary and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

**TABLE 5
CONSTRUCTION NOISE LEVELS AT 50 FEET**

Activity	Noise Level at 50 feet (dBA)
Ground Clearing/Demolition	84 ± 6 dBA
Excavations	89 ± 6 dBA
Foundations	78 ± 3 dBA
Erection of structures	85 ± 5 dBA
Finishing (i.e., paving)	89 ± 6 dBA

SOURCE: Bolt, Beranek, and Newman. December 1971. *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*. Washington, DC.

The 2011 FEIR found that construction activities would result in less than significant impacts with mitigation with respect to vibration impacts to residential structures within 50 feet of pile driving (Mitigation Measure Noise-3). No pile driving is proposed as part of the BHC. Therefore, induced structural damage is not anticipated. No additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

The 2011 FEIR indicates that vibration from construction activities (pile driving, large bull dozers and loaded trucks) would be perceptible in adjacent residences but that because construction activities would be limited to daytime hours and activities would be infrequent, vibration perception impacts from construction are considered less than significant. No additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

Operation

The 2011 FEIR indicates that mechanical equipment would result in a less than significant impact with mitigation (Mitigation Measure Noise-4). The proposed BHC could include new mechanical equipment for the original MACC (primarily Heating, Ventilation, Air Conditioning) that could be audible adjacent to the structure. Adopted Mitigation Measure Noise-4 would ensure that noise from mechanical equipment remained below 45 dBA at residences to the south through use of quiet equipment and/or use of insulating screens. Therefore, no additional mitigation would be required and there would be no new or greater stationary-source noise impacts than those identified in the certified 2011 FEIR.

The 2011 FEIR indicates that operational noise from mobile sources would be less than significant. The BHC together with Tier II development completed and proposed to date would not result in traffic exceeding existing levels identified in the 2011 FEIR. Therefore, mobile-source noise levels resulting from operation of the MLK Campus would not be greater than existing conditions identified in the 2011 FEIR. Eventually on completion of Tier II, traffic and associated noise is expected to increase but not to a level where mobile-source noise would result in a significant impact.

There would be no vibration impacts associated with operation of the BHC. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?		
(f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes no impact with respect to noise from airports and airstrips. The 2011 FEIR indicates that the project site is neither located within 2 miles of a public or private airstrip nor is it located within an airport land use plan.

The nearest airport, the Compton/Woodley Airport, is located approximately 2.1 miles south of the proposed project site, and the next nearest airport, the Gardena Valley Airport in the City of Gardena, is located approximately 4 miles southeast of the Campus. The proposed project site is not located within the immediate vicinity of any private airstrip. The nearest private airstrip is located in Playa Vista at 5510 Lincoln Boulevard, approximately 11.5 miles northwest of the MLK Campus. The Saint Francis Medical Center, which is located in the City of Lynwood, approximately 2.7 miles east of the MLK Medical Center Campus, has a helistop.

The 2011 FEIR identifies a helipad on the roof of the Inpatient Tower for hospital-specific emergency use. The proposed BHC would not change impacts as compared to the evaluation included in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

M. POPULATION AND HOUSING

Population and housing impacts of the project were evaluated with regard to the 2011 FEIR. The potential for the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) to result in new or substantially more adverse significant was evaluated in relation to three questions recommended for consideration by the State CEQA Guidelines.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Induce substantial 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)?		
(b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?		
(c) Displace substantial numbers of people, necessitating the construction of replacement housing?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes less than significant impacts with respect to population, and no impact with respect to displacement of housing and people. As indicated in the 2011 FEIR, the density and type of new development proposed by the Tier II project, is within the growth anticipated and accommodated by the County General Plan. The proposed BHC would be within the assumed MLK Campus population identified in the 2011 FEIR and would have a less than significant impact as identified in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

N. PUBLIC SERVICES

Public Services impacts of the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) were evaluated based on a review of the 2011 FEIR. The potential for the proposed BHC to result in new or substantially more adverse significant impacts to public services was evaluated in relation to one question (relevant to each public service) recommended for consideration by the State CEQA Guidelines.

(a) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to 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 listed below.		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

i) Fire

The 2011 FEIR indicates that the proposed redevelopment of the MLK Campus would result in less than significant impacts with respect to fire protection. The analysis indicates that the project area is served adequately by the existing fire protection facilities, therefore no mitigation is required. The proposed BHC together with all Tier I and Tier II development completed to date is within the assumptions for Tier II development analyzed in the 2011 FEIR and therefore would not create any additional demand for fire protection beyond what was analyzed.

The 2011 FEIR indicates that, *[i]t is understood however, that the County of Los Angeles Fire Department will review the specific fire department requirements during the planning phase of the proposed project in order to determine whether Tier II of the proposed project adequately meets the requirements of the County of Los Angeles Fire Department.* LA County Fire Department will approve the final project plan prior to issuance of building permits. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

ii) Libraries

The proposed BHC would not generate additional population and therefore would have no impact on libraries consistent with the evaluation in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

iii) Parks

The 2011 FEIR indicates a less than significant impact to parks as a result of development of the MLK Medical Center Campus. The proposed BHC would include a number of garden areas and would not generate additional population and therefore would not result in impacts to park facilities consistent with the evaluation in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

iv) Police Protection

The 2011 FEIR indicates that redevelopment of the MLK Medical Center Campus would not lead to additional population growth in the area and that overall development on the MLK Campus would have a less than significant impact on police protection. The 2011 FEIR indicates that while the allocation of police services would shift and grow consistent with population growth in the area, development on the MLK Medical Center Campus would not cause the provision of, or need for, new or physically altered governmental police protection facilities in order to maintain acceptable response times, and therefore there would be no significant impacts related to police protection facilities.

The Los Angeles County Sheriff's Department will review the final project plans prior to issuance of permits to ensure that appropriate security features are included in the project. Therefore, the proposed BHC would have a less than significant impact on police services consistent with the evaluation in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

v) *Schools*

The 2011 FEIR indicates a less than significant impact to schools as a result of development of the MLK Medical Center Campus. The proposed BHC would not generate additional population and would not result in additional children in the project area; it would therefore have no impact on school facilities consistent with the evaluation in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

vi) *Other public facilities*

The 2011 FEIR indicates a less than significant impact to other public facilities as a result of development of the MLK Medical Center Campus. The proposed BHC would have no impact to other public facilities consistent with the discussion in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

O. RECREATION

The potential for the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) to result in new or substantially more adverse significant impacts to recreation was evaluated in relation to the 2011 FEIR and two questions recommended for consideration by the State CEQA Guidelines.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Yes	No
(b) On-site recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR indicates no impact to recreation as a result of redevelopment of the MLK Medical Center Campus. The BHC would include garden areas for by patients, visitors and staff. The BHC would not generate additional population and therefore would not have an impact on recreational facilities consistent with the evaluation in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

P. TRANSPORTATION AND CIRCULATION

Transportation and traffic impacts of the project were evaluated in light of the 2011 FEIR. The potential for the BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) to result in new or substantially more adverse significant impacts related to transportation and traffic was evaluated in relation to six questions recommended for consideration by the State CEQA Guidelines.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?		
(b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes that traffic impacts (including impacts related to applicable plans and the Congestion Management Plan) would be less than significant with mitigation (Mitigation Measures Traffic-1 through Traffic-3).

In order to analyze impacts of the BHC, total trips generated by MLK Campus redevelopment was calculated and trips anticipated to be generated by the BHC were added to that:²

- Trips generated by existing conditions evaluated in the 2011 FEIR were identified.
- Trips generated by the MLK Campus on completion of Tier I elements identified and analyzed in the 2011 FEIR including vacation of the original MACC and the construction and use of the replacement MACC and ancillary structures were identified.
- Trips generated by Tier II projects proposed and/or completed to date were identified, including the campus daycare facility (in the Hudson Auditorium), a planned medical office building (net addition of 45,470 square feet) at the northeast corner of campus, the completed East Campus Parking Structure (which does not generate trips), and the now proposed BHC. (The recuperative care facility in the Interns and Physicians Building would not generate new trips as it was a replacement use in an existing, occupied building.)

The BHC was analyzed based on a net employee addition to the MLK Campus of 636 people (total number of employees would be 925 but 289 employees would transfer from other buildings on the MLK Campus). The BHC would represent a much less intense use of the original MACC building than was identified as existing conditions in the 2011 FEIR.

As a result of vacation of the original MACC and construction of Tier I project components there was still a large reduction in trips (-4,905 daily trips, -332 AM peak hour trips and -338 PM peak hour trips) compared to existing conditions identified in the 2011 FEIR.

The addition of trips associated with the daycare center, the medical office building and the now-proposed BHC would still result in total trips generated by the MLK Campus being less

² Technical Memorandum, Traffic Study of MLK Medical Center Campus Proposed Projects, KOA Corporation, July 16, 2018

than existing conditions identified in the 2011 FEIR -1,334 daily trips, -48 AM peak hour trips and -18 trips PM peak hour trips).

Since the BHC together with all development on the MLK Campus to date, would not exceed existing conditions for the MLK Campus identified in the 2011 FEIR, and would not redistribute traffic (as for the East Campus Parking Structure) no further analysis is necessary and the BHC project does not trigger any additional operational traffic mitigation measures (Mitigation Measures Traffic-2 through Traffic-4) beyond those implemented as a result of the East Campus Parking Structure.

The MLK Campus encourages alternate modes of travel (pedestrian amenities, proximity to transit stops). Impacts of the proposed BHC would not result in impacts from the MLK Campus greater than those identified as existing conditions in the 2011 FEIR. Therefore, implementation of traffic mitigation measures identified in the 2011 FEIR is not required and no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(c) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes no impact with respect to air traffic patterns. Consistent with the analysis in the 2011 FEIR, the proposed BHC would have no impact on air traffic patterns. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(d) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concluded a less than significant impact with respect to increased hazards due to a design feature. The proposed BHC would not introduce a new design feature that would increase hazards. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(e) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to inadequate emergency access?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concluded less than significant impact with respect to emergency access. The 2011 FEIR indicates that evacuation plans and procedures, emergency access ingress and egress points, fire lanes, and appropriate turnaround radii for internal and external streets will be provided to the satisfaction of the Los Angeles County Fire Department. No permanent lane closures or obstructions that could impede emergency response to or from the site from surrounding streets would occur with the proposed BHC. Consequently, the proposed BHC would result in a less than significant impacts related to emergency access and impacts would be comparable to those anticipated in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(f) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to potential conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes less than significant impact with respect to adopted plans and policies regarding transit, bicycle or pedestrian facilities. The proposed BHC would be consistent with applicable plans, programs and policies regarding transit, bicycle and pedestrian facilities in much the same way as the 2011 FEIR. The proposed BHC would incorporate design features that encourage alternate modes of travel (pedestrian amenities, proximity to transit). The 2011 FEIR did not identify adverse impacts to bicycle facilities. Consequently, the proposed BHC would have a comparable less than significant impact as the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

Q. UTILITIES

Utilities and service systems impacts of the proposed BHC (renovation of the original MACC and demolition of the Hawkins Building and replacement with gardens and surface parking) were evaluated with regard to the 2011 FEIR (including the Initial Study) and required mitigation measures. The potential for the proposed BHC to result in new or substantially more adverse significant impacts to utilities and service systems was evaluated in relation to seven questions recommended for consideration by the State CEQA Guidelines.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Exceeding wastewater treatment requirements of the applicable Regional Water Quality Control Board?		
(b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes less than significant impacts with mitigation with respect to wastewater treatment requirements and wastewater treatment facilities (Mitigation Measure Utilities-1). The proposed BHC would occupy an existing building and would not result in a substantial change in wastewater generation as compared to existing conditions identified in the 2011 FEIR. The 2011 FEIR indicates that Tier II development as a whole would not exceed the wastewater treatment requirements or standards of the RWQCB. The wastewater generated would be treated at the Hyperion Treatment Plant. The proposed BHC is within an existing building that connects to the existing wastewater system and would not include the development of major new sewer lines. Therefore, the proposed BHC would have a less than significant impact on wastewater consistent with the evaluation in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(c) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to requiring or resulting in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes impacts to storm drains related to Tier II development would be less than significant. Although the proposed MLK Campus Redevelopment Project as a whole could result in an increase of the impervious surface area of the site, compliance with proper building design and the LA County Low Impact Development (LID) Ordinance would ensure that the site is adequately drained and that storm water is infiltrated to the extent feasible. The BHC would occupy the original MACC and result in new gardens and a small surface parking lot. No increase in impervious surfaces is anticipated compared to that considered in the 2011 FEIR. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(d) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes less than significant impacts with respect to water supplies. As indicated in the 2011 FEIR the Park Water Company, Central Division (PWC) provides potable water supplies for the Compton West service area that includes the proposed project area. The estimated MLK Campus water demand on completion of Tier II was calculated to be 442 AFY during a single dry year. The highest demand estimated for Tier II is 473.4 AFY, which would be during a single dry year or the first dry year of multiple dry year conditions. On completion of Tier II, the MLK Campus would add approximately three percent to the PWC's overall projected demand. A Water Supply Assessment for the MLK Redevelopment Project concluded that there would be sufficient water to meet the anticipated demand from the MLK Campus in addition to other existing and planned future uses in the service territory.³ Both the PWC and MWD predicted sufficient water supplies through 2030; thus, the proposed Tier II Phase (of which the BHC is a part) would have sufficient water supplies. The 2011 FEIR concluded that Tier II would result in less than significant impacts with regard to water supply. The proposed BHC would result in water consumption within that analyzed in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

(e) Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to resulting 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?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes less than significant impacts with mitigation with respect to wastewater treatment providers (Mitigation Measure Utilities-1, requiring payment of connection fees for the sewer system). The 2011 FEIR indicates that the Hyperion Treatment Plant has the capacity to absorb projects that are consistent with regional growth projections identified by SCAG. Additionally, the 2011 FEIR indicates that although the site is well served by major pipeline infrastructure for wastewater collection, new project related connections associated with Tier II development as a whole could be needed. As noted above, the proposed BHC would occupy an existing building with existing sewer connections and would not require new sewer

³ County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Inc.*, Los Angeles, CA, p. 8-2.

facilities. Wastewater generated at the MLK Campus is treated at the Hyperion Treatment Plant. Implementation of Mitigation Measure Utilities -1 for new development projects on the MLK Campus would ensure expansion of the sewage system as needed to accommodate needs. Therefore, consistent with the 2011 FEIR implementation of the proposed BHC would result in less than significant impacts with incorporation of mitigation. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the certified 2011 FEIR.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?		
(g) Comply with federal, state, and local statutes and regulations related to solid waste?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 FEIR concludes that impacts related to solid waste would be less than significant with mitigation (Mitigation Measure Utilities-2). Consistent with the findings of the 2011 FEIR, the proposed BHC would generate new sources of solid waste (construction debris from demolition of the Hawkins Building and renovation of the original MACC, trash and green waste). Such generation of solid waste would be consistent with the analysis in the 2011 FEIR. Operation of the proposed BHC would generate waste that would be within the assumed increases in solid waste for Tier II as a whole analyzed in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the certified 2011 FEIR.

R. GROWTH INDUCING IMPACTS

The 2011 FEIR determined that the MLK Campus Redevelopment Project would not result in substantial growth inducing impacts.

Consistent with the 2011 FEIR, as one component of Tier II development analyzed in the 2011 FEIR, the proposed BHC would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. The BHC would entail renovation of the original MACC and provision of necessary gardens and parking. The BHC would be located in an urban area within the unincorporated area of Los Angeles County consistent with permitted uses and densities called for by the General Plan designation of the site. Additionally, the project would be located in close proximity to various public transportation opportunities.

The proposed BHC would employ 925 people (289 of whom would relocate from the existing Hawkins Building).

Overall, as with the 2011 FEIR, the proposed BHC would not result in an increase in the population that could tax existing community service facilities or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulatively. Thus, the proposed BHC would not result in significant growth-inducing impacts.

The proposed BHC would be built in an existing urban setting and served by existing infrastructure and adjacent streets. The proposed BHC would not provide through access to vacant undeveloped parcels whose development potential could otherwise be enhanced, nor would it require extending or improving infrastructure in a manner that would facilitate off-site growth.

Overall, the proposed BHC would not remove obstacles to population growth, result in an increase in the population that may tax existing community service facilities, or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulative. Thus, as discussed in the 2011 FEIR, the proposed BHC would not result in significant growth-inducing impacts.

S. MANDATORY FINDINGS OF SIGNIFICANCE

Mandatory Findings of Significance were evaluated with respect to the 2011 FEIR and three questions.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
a) Potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2011 certified FEIR concluded that the MLK Redevelopment Project would have significant impacts with respect to the issue areas identified below. (How the proposed BHC would relate to these issues is also discussed.)

- 5) **Air Quality** -- *Construction*: Emissions would exceed regional daily thresholds for VOCs and NO_x and localized thresholds for NO_x, PM_{2.5} and PM₁₀ -- based on assumed equipment use and distance to sensitive receptors. *Operations*: Emissions would exceed regional daily thresholds for VOCs, NO_x, CO and PM₁₀. Demolition of the Hawkins Building, subsequent site preparation, and activities associated with renovation of the original MACC together with any overlapping construction activities at the medical office building at the northeast corner of the MLK Campus would result in peak daily emissions within those analyzed in the 2011 FEIR. However, impacts could remain significant. Trips generated by the BHC together with other development on the MLK Campus to date would be within the trip generation identified as existing conditions in the 2011 FEIR. However, on completion of Tier II, the BHC would be a part of a net increase in trips that could contribute to a significant impact associated with operation of the overall MLK Campus on completion of the overall MLK Redevelopment Project.
 - **Cultural Resources** -- Impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center,

Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium (Hudson Auditorium) as a result of Tier II. The demolition/removal of these historical resources was identified as a significant and unavoidable impact. The renovation of the original MACC would retain the iconic original MACC with the exterior character-defining features substantially as is. The exterior of the building would be cleaned, and a treatment may be applied. The feasibility of complying with the Secretary of the Interior's Standards has not been determined and therefore impacts (to the building and the MLK Campus Historic District) could still be significant although still less than full demolition. The demolition of the Hawkins Building would be significant (to the building and the MLK Campus Historic District).

- **Greenhouse Gases** -- Potential GHG emission impacts associated with construction and operation of Tier II would be significant and unavoidable; the BHC would contribute to GHG emissions analyzed in the 2011 FEIR contributing to the significant impact. The BHC together with other tier II projects to date would not exceed trips occurring when the 2011 EIR was prepared, however, the BHC would be one component of the overall MLK Redevelopment project and would contribute to total GHG emissions on completion of all Tier II projects.
- **Construction Noise** – The nearest residential land use to the original MACC is approximately 60 feet to the south. The 2011 FEIR indicates that construction noise levels would exceed the 75 dBA threshold level at residences that are within 80 feet of construction activities. Most of the demolition, construction and renovation activities would be more than 80-feet from the single-family homes to the south. However, cleaning could include sandblasting and/or other treatments of the original MACC exterior that could briefly impact homes in the immediate vicinity.

These significant impacts have the potential to degrade the quality of the environment and potentially eliminate important examples of major periods of California history (the impact to the Hawkins Building and MLK Historic District, and potential impact to the original MACC if compliance with the Secretary of the Interior's Standards is not feasible). No additional mitigation has been identified and there would be no new or greater impacts than those identified in the certified 2011 FEIR with respect to these issue areas.

The 2011 FEIR did not find that redevelopment of the MLK Medical Center had the potential to, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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 prehistory. The proposed BHC would not increase impacts compared to those analyzed in the 2011 FEIR and therefore similarly would not substantially impact these issues.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(b) Impacts, which are individually limited, but cumulatively considerable? (Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Other than the significant impacts identified above, the 2011 FEIR did not identify any other impacts that would be individually limited, but cumulatively considerable. All impacts associated with the proposed BHC would not exceed those analyzed in the 2011 FEIR and therefore would not result in individually limited impacts that could be cumulatively considerable.

Does the proposed Behavioral Health Center require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(c) Environmental effects, which cause substantial adverse effects on human beings, either directly or indirectly?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The four significant impacts identified above that were analyzed in the 2011 FEIR would have the potential to cause substantial adverse effects on human beings, either directly or indirectly. However, the proposed BHC would not require additional mitigation or result in new or greater impacts than those identified in the certified 2011 FEIR with respect to these issue areas.

T. CONCLUSION

The proposed BHC is described in Section 2 of this Addendum and would be within the assumptions analyzed in the 2011 FEIR. The proposed BHC has been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the Guidelines. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions (identified in Section 1) apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified MLK Campus Redevelopment Project Final EIR is the appropriate environmental documentation under CEQA for the proposed BHC.

Section 3 discusses issue-by-issue how the impacts anticipated for the proposed BHC would be within those previously identified in the 2011 FEIR. The Mitigation Monitoring Program (MMP) adopted with the 2011 FEIR would continue to apply to the proposed BHC to ensure that all impacts are reduced as necessary and feasible.

As discussed throughout this Addendum (see in particular the summary presented in **Table 4**), the proposed BHC would result in environmental impacts within those analyzed for Tier II development for every issue with implementation of applicable mitigation measures as included in the adopted Mitigation Monitoring Plan for the MLK Medical Center Campus Redevelopment Project.

4. REFERENCES

Martin Luther King Jr. Medical Center, Behavioral Health Center Feasibility Study, HMC Architects, April 16, 2018.

Martin Luther King Jr. Medical Center Campus Redevelopment Project, Reuse of Historic Buildings and Hawkins Building Demolition, July 2018.

County of Los Angeles, Martin Luther King, Jr. (MLK) Medical Center Campus Redevelopment Final Environmental Impact Report, certified October 11, 2011.

Gensler, MLK Medical Center Campus Master Plan & the Willowbrook MLK Wellness Community Vision, June 2012; prepared for the County of Los Angeles (approved January 15, 2013).

5. REPORT PREPARATION

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