

Appendix A
Notice of Preparation and Initial Study Checklist



**COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS**



**NOTICE OF PREPARATION
LAC+USC MEDICAL CENTER MASTER PLAN PROJECT
ENVIRONMENTAL IMPACT REPORT**

To: State Clearinghouse, Responsible and Trustee Agencies, and Interested Individuals

Subject: Notice of Preparation of an Environmental Impact Report, LAC+USC Medical Center Master Plan Project

Project Title: LAC+USC Medical Center Master Plan

Lead Agency: County of Los Angeles

The County of Los Angeles, as the lead agency, has prepared an Initial Study and will be preparing an Environmental Impact Report for the proposed project described below. The County of Los Angeles Department of Public Works (DPW), on behalf of the County, is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the Environmental Impact Report. Agencies should comment on the elements of the environmental information that are relevant to their statutory responsibilities in connection with the proposed project.

The project description, location, and potential environmental effects of the proposed project are described in this Notice of Preparation and attached Initial Study. This notice and attached Initial Study meet the requirements set forth in the California Environmental Quality Act (CEQA).

Scoping comments on the Environmental Impact Report should be sent to DPW in writing, no later than **June 18, 2014**. Please send all written comments, including e-mailed comments, to Clarice Nash at the address below. Comments should include the name of a contact person.

Copies of the Notice of Preparation/Initial Study are available for public review at the following Public Library locations:

Chinatown Branch Library 639 N. Hill Street Los Angeles, CA 90012 (213)620-0925	Lincoln Heights Library 2530 Workman Street Los Angeles, CA 90031 (323)226-1692	El Sereno Branch 5226 Huntington Drive Los Angeles, CA 90032 (323)225-9201
Malabar Branch Library 2801 Wabash Avenue Los Angeles, CA 90033 (323)263-1497	Benjamin Franklin Library 2200 East 1 st Street Los Angeles, CA 90033 (323)263-6901	Anthony Quinn Library 3965 East Cesar Chavez Avenue Los Angeles, CA 90063 (323)264-7715
City Terrace Library 4025 East City Terrace Drive Los Angeles, CA 90063 (323)261-0295	LAC+USC Medical Center Inpatient Tower and Outpatient Clinic- Information Desks 2051 Marengo Street Los Angeles, CA 90033 (323)409-1000	

Interested parties may submit their comments to:

Clarice Nash, Project Manager
County of Los Angeles Department of Public Works
Project Management Division I
900 S. Fremont Ave.
Alhambra, CA 91803-1331
E-mail: cnash@dpw.lacounty.gov

Questions regarding this notice should be directed to Clarice Nash at (626) 300-2363 or at the e-mail shown above, Monday through Thursday, between 7:30 a.m. and 6:00 p.m.

A public scoping meeting will be held on **June 4, 2014**, from **4:30 pm to 7:30 pm**, to solicit input from interested parties on the scope and content of the Environmental Impact Report in conformance with Section 21083.9 of the Public Resources Code.

Location: LAC+USC Medical Center
Medical Center Inpatient Tower – Conference Rooms A & B
2051 Marengo Street
Los Angeles, CA 90033
Free Parking in Lot 9D on Marengo Street, (Entrance on Britannia Street)
(Please note that all visitors are subject to screening prior to entry.)

Project Location:

The LAC+USC Medical Center is located at 2051 Marengo Street on several parcels of land owned by the County of Los Angeles and is surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles, in Los Angeles County. Specifically, the site is bounded by Zonal Street, Mission Road, Marengo Street, and Chicago Street. State Street bisects the project site. The site is located east of the I-5 (Golden State) Freeway and north of the I-10 (San Bernardino) Freeway.

Project Description:

The proposed LAC+USC Medical Center Master Plan Project (proposed project) consists of a master plan that is envisioned over a period of approximately 25 years, that would be used to guide future development of the LAC+USC Medical Center campus and would influence the delivery of health care services and health related community programs. The goals of the Master Plan are to:

1. Achieve a community-friendly campus
2. Promote healthy lifestyles and wellness
3. Maximize access to the Medical Center by the community
4. Provide opportunities for appropriate education and job training
5. Incorporate on-campus business opportunities
6. Plan for future program development

Development under the Master Plan would include construction of new and renovated medical-related, office, retail, open space, and parking uses and demolition of some existing buildings and structures to accommodate new development. Full build out of the Master Plan could result in a total of approximately 1,725,000 square feet of development throughout the campus.

Potential Environmental Effects:

The Initial Study contains a preliminary analysis of the environmental impacts of the proposed project in accordance with the CEQA Guidelines that identify 16 areas where impacts could occur. These impacts, which will be analyzed in detail in the Environmental Impact Report, include: aesthetics, air quality, biological resources, greenhouse gas emissions, cultural resources, hazards and hazardous materials, hydrology and

water quality, geology and soils, recreation, population and housing, public services, utilities and service systems, land use and planning, noise, transportation and traffic, and impacts under mandatory findings of significance.

Si necesita asistencia con la traducción a Español, por favor comuníquese con el representante del departamento de Obras Públicas del Condado de Los Angeles, Sr. Anaya al (213) 312-1772.



Upon 72 hours' notice, Public Works can provide program information and publications in alternate formats or make other accommodations for people with disabilities. In addition, program documents are available at our main office in Alhambra (900 S. Fremont Ave.), which is accessible to individuals with disabilities. To request accommodations ONLY or for more Americans with Disabilities Act information, please contact our departmental Americans with Disabilities Act Coordinator at (626) 458-4081 or by TDD (626) 282-7829, Monday through Thursday, from 7:00 a.m. to 5:30 p.m.

INITIAL STUDY – CHECKLIST

**FOR THE PROPOSED
LAC+USC MEDICAL CENTER MASTER PLAN PROJECT
LOS ANGELES, CALIFORNIA**

Prepared at the Direction of

County of Los Angeles
By the Department of Public Works
900 South Fremont Avenue
Alhambra, California 91803

Lead Agency Pursuant to the California Environmental Quality Act

Prepared by



MAY 2014

Environmental Checklist

1. **Project Title:** LAC+USC Medical Center Master Plan Project
2. **Lead Agency Name and Address:** County of Los Angeles
by the Department of Public Works
900 South Fremont Avenue
Alhambra, California 91803
3. **Contact Person and Phone Number:** Clarice Nash
Chief Executive Office
(626) 300-2363
4. **Project Location:**

The LAC+USC Medical Center is located at 2051 Marengo Street on several parcels of land owned by the County of Los Angeles. The proposed Master Plan is for the entire LAC+USC Medical Center Campus, and thus the entire campus is considered the project site. LAC+USC Medical Center is surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles, in Los Angeles County. Specifically, the site is bounded by Zonal Street, Mission Road, Marengo Street, and Chicago Street. State Street bisects the project site. The site is located east of the I-5 (Golden State) Freeway and north of the I-10 (San Bernardino) Freeway. See Figures 1 and 2 for the project location. .
5. **Project Sponsor's Name and Address:** County of Los Angeles
by the Department of Public Works
900 South Fremont Avenue
Alhambra, California 91803
6. **General Plan Designation:** Public Facilities (P)
7. **Zoning:** Public Facilities (PF)
8. **Description of Project:**

The proposed LAC+USC Master Plan Project (proposed project) consists of a master plan that is envisioned over a period of approximately 25 years, that would be used to guide future development of the campus and would influence the delivery of health care services and health related community programs. The goals of the Master Plan are to:

 1. Achieve a community-friendly campus
 2. Promote healthy lifestyles and wellness
 3. Maximize access to the Medical Center by the community
 4. Provide opportunities for appropriate education and job training
 5. Incorporate on-campus business opportunities
 6. Plan for future program development

Development under the Master Plan would include construction of new and renovated medical-related, office, retail, open space, and parking uses and demolition of existing buildings and structures to accommodate new development. Full build out of the Master Plan could result in a total of approximately 1,725,000 square feet of development throughout the campus.



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Figure 1
Regional Location
LAC+USC Medical Center Master Plan EIR



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Figure 2
Project Vicinity
LAC+USC Medical Center Master Plan EIR



Environmental Factors Potentially Affected

The environmental factors checked below could be affected by this project (i.e., the project would involve at least one impact that is a “potentially significant impact”), as indicated by the checklist on the following pages.

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

Determination

On the basis of this initial evaluation:

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

Lee Lisecki
Signature

Lee Lisecki
Printed Name

5/16/14
Date

County of Los Angeles Department
of Public Works
For

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational, impacts.
3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an environmental impact report (EIR) is required.
4. “Negative Declaration: Less than Significant with Mitigation Incorporated” applies when the incorporation of mitigation measures has reduced an effect from a “Potentially Significant Impact” to a “Less-than-Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level. (Mitigation measures from the “Earlier Analyses” section may be cross-referenced.)
5. Earlier analyses may be used if, pursuant to tiering, program EIR, or other California Environmental Quality Act (CEQA) processes, an effect has been adequately analyzed in an earlier EIR or negative declaration [Section 15063(c)(3)(D)]. In this case, a brief discussion should identify the following:
 - a. *Earlier Analysis Used.* Identify and state where earlier analyses are available for review.
 - b. *Impacts Adequately Addressed.* Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. *Mitigation Measures.* For effects that are “Less than Significant with Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.
7. *Supporting Information Sources:* A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to a less-than-significant level.

I.	AESTHETICS – Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	<p>Have a substantial adverse effect on a scenic vista?</p> <p>The project site is located on a hilly area and is visible from the surrounding area. The proposed project would involve the construction and operation of medical, office, and outdoor community space. Specifically, it would introduce new structures, access points, and outdoor areas to the project site and would include the demolition of a number of existing buildings on the campus to accommodate future development. The proposed project is not anticipated to have a significant adverse effect on a scenic vista. Nonetheless, this issue will be analyzed further in the Environmental Impact Report (EIR).</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	<p>Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?</p> <p>The proposed project is not located within the vicinity of a designated State Scenic Highway (California Scenic Highways Mapping System). The proposed project, however, would include the demolition of a number of buildings on the campus, some of which may be considered historical and/or visual resources, and the removal of some existing trees and landscaping. This issue will be analyzed further in the EIR, and if impacts are found to be potentially significant, appropriate mitigation measures will be provided to reduce impacts to less than significant to the extent practicable.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	<p>Substantially degrade the existing visual character or quality of the site and its surroundings?</p> <p>The proposed project would include the implementation of a master plan that would guide future development of the campus and would influence the delivery of health care services and health related community programs. The proposed project would include demolition and construction activities, potential reuse of existing buildings and the development of public outdoor areas. Access to the site would be improved. Construction and operation of the proposed project is not anticipated to degrade the existing visual quality. However, since the visual character of the site and views may change, this issue will be analyzed further in the EIR, and if impacts are found to be potentially significant, appropriate mitigation measures will be provided to reduce impacts to less than significant to the extent practicable.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
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- d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Both the project site, which is developed with the LAC+USC Medical Center, and the surrounding area include sources of lighting and glare. Existing sources of light and glare include street lighting, parking lighting, and reflective surfaces such as windows on buildings and cars. The proposed project would introduce new buildings and parking areas onto the existing campus. These proposed buildings and parking structures may create new sources of light and glare in the area. This issue will be analyzed further in the EIR.

Mitigation: Should the Draft EIR identify significant impacts to aesthetics, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

II. AGRICULTURE AND FOREST RESOURCES – In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, and the forest carbon measures methodology provided in the Forest Protocols adopted by the California Air Resources Board.

Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

The project site is located in a developed portion of the City of Los Angeles and is occupied by the LAC+USC Medical Center. The project site is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would not convert such farmland to nonagricultural use. Since the proposed project would not have a farmland conversion impact, the proposed project would also not contribute to a cumulative farmland conversion impact. No further analysis is warranted in the EIR.

- b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

The site is not under Williamson Act contract (California Department of Conservation, 2008), nor is it zoned or designated for agricultural use. The project site is in the midst of a developed area with no nearby agricultural land. The proposed project would therefore have no potential to convert farmland, conflict with agricultural zoning, or lead to other changes in the existing environment that could lead to farmland conversion. Since the proposed project would not have an impact with regard to conflicts with existing land zoned for agricultural use, the proposed project would also not contribute to a cumulative impact on agriculturally zoned land. No further analysis is warranted in the EIR.

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>c) Conflict with existing zoning for or cause rezoning of forestland (as defined by Public Resources Code Section 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by U.S. Government Code Section 51104(g))?</p> <p>The project site is not zoned as forestland, timberland, or timberland zoned Timberland Production. The project site is currently developed and does not contain forestland or timberland. Therefore, the proposed project would not conflict with existing zoning or cause rezoning of forest or timberland. Since the project would not affect forestland or timberland, it would also not contribute to a cumulative impact with regard to conversion of forestland or timberland. No further analysis is warranted in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Result in the loss of forestland or conversion of forestland to non-forest use?</p> <p>The project site is not located on or near forestland. Therefore, the proposed project would not result in the loss or conversion of forestland. Since the proposed project would have no impact on forestland, it would also not contribute to a cumulative impact with regard to forestland conversion. No further analysis is warranted in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e) Involve other changes in the existing environment that, because of their location or nature, could result in the conversion of farmland to nonagricultural use or the conversion of forestland to non-forest use?</p> <p>The proposed project would not convert farmland or forestland (see responses to Items II.a) and d), above). Since the proposed project would not have a secondary impact with regard to farmland or forestland conversion, the project would also not contribute to a cumulative farmland or forestland conversion impact. No further analysis is warranted in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</p>				
<p>a) Conflict with or obstruct implementation of the applicable air quality plan?</p> <p>The project site is located within the South Coast Air Basin (SCAB), which is managed by the South Coast Air Quality Management District (SCAQMD). Potential emissions associated with construction and operation of the project will be evaluated in the EIR for compliance with all applicable air quality plans.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</p> <p>The proposed project would involve construction and improvements to the LAC+USC Medical Center. The potential exists for project-related emissions, traffic congestion, and exceedances of SCAQMD thresholds. Furthermore, during project operation, project-related emissions may result in a cumulatively considerable net increase in criteria pollutants. Therefore, the project could exceed an air quality standard and contribute to a cumulatively considerable net increase in criteria pollutants. This issue will be analyzed further in the EIR.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>c) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is in nonattainment status under an applicable federal or state ambient air quality standard (this includes the release emissions the exceed quantitative thresholds for zone precursors)?</p> <p>See response to Item III.b). This issue will be analyzed further in the EIR.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>d) Expose sensitive receptors to substantial pollutant concentrations?</p> <p>Sensitive receptors are located within the site and in the surrounding area. Specifically, hospital uses are located throughout the site. Additionally, residential uses and the Bravo Medical Magnet High School are located in the area surrounding the project site. The potential exists for exposure of sensitive receptors to pollutant concentrations. This issue will be analyzed further in the EIR.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
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e) Create objectionable odors that would affect a substantial number of people?

Dust and odor emissions could be produced during project construction, although these emissions would be temporary and would cease once construction is complete. Additionally, dust generated by construction within the SCAB, would be reduced through implementation of the fugitive dust control measures outlined in Rule 403. This issue will be analyzed further in the EIR.

Mitigation: Should the Draft EIR identify significant impacts to air quality, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

IV. BIOLOGICAL RESOURCES – Would the project:

- 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 the U.S. Fish and Wildlife Service?

The project site is located on the already-developed campus of the LAC+USC Medical Center. Due to the previously disturbed nature of the site, the project site lacks significant native vegetation that would provide habitat for any unique, rare, or endangered plant or animal species. Because of its location in a highly urbanized area, it is also unlikely to serve as a wildlife corridor for terrestrial animals. However, the project may have the potential to disturb or remove some on-site mature trees located on the site. While these trees may include introduced ornamental landscaping, and are not in themselves sensitive biological resources, they have the potential to serve as habitat for nesting birds. This issue will be analyzed further in the EIR.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

The project site is fully developed and does not contain areas with a riparian or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. A review of California Department of Fish and Wildlife maps, maps from the U.S. Fish and Wildlife Service, and County and City of Los Angeles General Plan documents shows no identified riparian habitat or other natural community on the LAC+USC Medical Center campus or adjacent to it. The freshwater pond at Lincoln Park and the Los Angeles River are both over a quarter-mile from the project site. Construction and operation activities associated with implementation of the Master Plan would follow all best management practices for the protection of wetlands and water bodies. Since the proposed project would not have an impact on any riparian habitat or other sensitive natural community, the project would also not contribute to a cumulative impact on these resources. Therefore, further analysis in the EIR is not warranted.

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>c) Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including marshes, vernal pools, coastal areas, etc.), through direct removal, filling, hydrological interruption, or other means?</p> <p>The project site is developed with the LAC+USC Medical Center. No wetlands are located on the project site or in the immediate vicinity. The freshwater pond at Lincoln Park and the Los Angeles River are both over a quarter-mile from the project site. Construction and operation activities associated with implementation of the Master Plan would follow all best management practices for the protection of wetlands and water bodies. Therefore, the proposed project would not have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act, through direct removal, filling, hydrological interruption, or other means. Furthermore, this issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?</p> <p>See response to Item IV.a). Due to the previously disturbed nature of the site, the project site lacks significant native vegetation that would provide habitat for any unique, rare, or endangered plant or animal species. Because of its location in a highly urbanized area, it is also unlikely to serve as a wildlife corridor for terrestrial animals. However, the project may have the potential to disturb or remove some on-site mature trees located on the site. While these trees may include introduced ornamental landscaping, and are not in themselves sensitive biological resources, they have the potential to serve as habitat for nesting birds. This issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>e) Conflict with any local policies or ordinances to protect biological resources, such as a tree preservation policy or ordinance?</p> <p>The proposed project would include the demolition of buildings and the construction of new buildings at the project site. Community public space would also be developed under the proposed project. Tree removal may occur under the proposed project. Any tree removal would follow applicable local policies and ordinances aimed at tree preservation. This issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
f)	<p>Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?</p> <p>A review of County and City planning documents (such as the General Plans, Community Plans, and Specific Plans) shows that the project site is not located within an area covered under an adopted habitat conservation plan, natural community conservation plan or other approved local, regional or state habitat conservation plan. Consequently, the proposed Master Plan would not conflict with these plans; there would be no impact, and thus no contribution to a cumulative impact. Therefore, further analysis in the EIR is not warranted.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Mitigation: Should the Draft EIR identify significant impacts to biological resources, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.</p>					

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
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V. CULTURAL RESOURCES – Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines?

The project site is occupied with the LAC+USC Medical Center, which includes buildings that have been determined eligible for the National Register of Historic Places. Additionally, the project site contains buildings older than 50 years that have not been evaluated for historical significance. These buildings would need to be evaluated to determine historical significance prior to any proposed demolition and construction proposed under the proposed project. This issue will be analyzed further in the EIR.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines?

Given the extent of previous ground disturbances in the project area and the fact that the project site is developed, unearthing of archeological resources is not expected during project construction. However, the potential for unearthing archaeological resources still exists as ground-disturbing activities would occur under the proposed project. This issue will be analyzed further in the EIR.

- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Given the extent of previous ground disturbances in the project area and the fact that the project site is developed, unearthing of paleontological resources is not expected during project construction. However, the potential for unearthing paleontological resources still exists as ground-disturbing activities would occur under the proposed project. This issue will be analyzed further in the EIR.

- d) Disturb any human remains, including those interred outside of formal cemeteries?

The project site is not located in an area that contains formal or known informal cemeteries. Nevertheless, this issue will be analyzed further in the EIR.

Mitigation: Should the Draft EIR identify significant impacts to cultural resources, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

VI. GEOLOGY AND SOILS – Would the project:

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.

The project site is not located within an Alquist-Priolo Special Studies Zone, so the probability of seismic surface rupture is considered low. In addition, the site has not been designated as a zone of required investigation for earthquake-induced landslides (California Department of Conservation, September 2012). Similar to all of Southern California, active and/or potentially active faults in the region could generate strong ground shaking on the project site. The project site could experience shaking from faults in the area including the Raymond Fault, Whittier Fault, Newport-Inglewood Fault, or the San Andreas Fault. The proposed project would be required to comply with applicable provisions of the most recently adopted version of the California Building Code and County building regulations. The issue will be analyzed further in the EIR.

- ii) Strong seismic ground shaking?

Although the project site is not underlain by an active fault system, the site is susceptible to strong seismic ground shaking conditions, which are a common hazard in most of Southern California. The project site is located approximately 4 miles south of the nearest Alquist-Priolo Fault Zone. Future large earthquakes along any of the faults in the Southern California region could cause sustained ground shaking in the vicinity of the proposed project. The proposed project would involve the construction and operation of medical, office, retail, and community space. Newly constructed facilities would comply with applicable provisions of the most recently adopted version of the California Building Code and County building regulations. Therefore, a substantial risk to life or property from strong seismic ground shaking would not occur. The issue will be analyzed further in the EIR.

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>iii) Seismically related ground failure, including liquefaction?</p> <p>Liquefaction is a condition that occurs when unconsolidated, saturated soils change to a near-liquid state during ground shaking. The western portion of the project site is located within a potential liquefaction zone as identified on the State of California Seismic Hazards Zone Map, Los Angeles Quadrangle (California Department of Conservation, March 1999). This issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>iv) Landslides?</p> <p>Typically, landslide activity occurs adjacent to steep slopes that lack vegetation. The project site has been extensively engineered to accommodate existing development, and has not been designated as a zone of required investigation for earthquake-induced landslides. In addition, the Seismic Hazard Zone Map indicates that the project site is not located within an area that is subject to seismically related landslides (California Department of Conservation, Division of Mines and Geology 1999). Therefore, the risk of landslide at the project site is considered unlikely. Nevertheless, this issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>b) Result in substantial soil erosion or the loss of topsoil?</p> <p>Construction of the proposed project could result in ground surface disruption, including disruptions from grading and excavation activities. Such activities could result in erosion at the project site during construction. However, construction projects that result in ground disturbance of 1 acre or more must apply for a Stormwater General Permit under the National Pollutant Discharge Elimination System (NPDES). All construction would follow best management practices (BMPs) to prevent erosion that might move off-site, as required under the Stormwater Pollution Prevention Plan (SWPPP) for compliance with State Water Resources Control Board NPDES Construction General Permit 2009-0009. In accordance with existing regulations, the SWPPP would be prepared to identify BMPs that would be implemented to prevent construction area runoff and sediment from entering the storm drain system. The SWPPP would be implemented during construction. This issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?</p> <p>As discussed under Item VI) (a) (iii), the western portion of the project is located within an area identified as a potential liquefaction zone. According to the Seismic Hazards Report prepared by the California Department of Conservation, the project site is underlain by pre-Quaternary period bedrock and Pleistocene period alluvial-fan deposits composed of sand, silt, and gravel (1998). Such materials are not considered inherently unstable. This issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>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?</p> <p>See response to Item VI(c), above. Expansive soils contain minerals that absorb water when wet. This causes the soil to expand. The soil units underlying the project site are composed of bedrock, sand, silt, and gravel. Such materials are not typically associated with expansive soils. The proposed project is not anticipated to result in a substantial risk to life or property because it would not involve construction on geologic units that could be severely damaged by expansive soils. Nonetheless, this issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>e) Have soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?</p> <p>The project would not propose the use of septic tanks or alternative wastewater disposal systems at the site; therefore, the proposed project would have no impact or contribute to a cumulative impact since it does not involve the use of septic tanks or alternative wastewater disposal systems. Thus, further analysis is not warranted and the issue is not carried forward to the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Mitigation: Should the Draft EIR identify significant impacts to geology and soils, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.

Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
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VII. GREENHOUSE GAS EMISSIONS – Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The proposed project would generate greenhouse gas (GHG) emissions during both construction and operation of the project. This issue will need to be analyzed further in the EIR.

- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

The County has enacted a variety of policies and plans, including the Los Angeles Regional Climate Action Plan, to fulfill the objectives outlined in Assembly Bill 32. The Draft Los Angeles County General Plan 2035 Update also supports the goal of reducing vehicle miles traveled and the number of vehicle trips, as well as alternative modes of transportation, to reduce GHG emissions. The project would not impede implementation of plans, policies, or regulations that meet either the state or County's GHG reduction goals. However, this issue will be analyzed further in the EIR.

Mitigation: Should the Draft EIR identify significant greenhouse gas emission impacts, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The proposed project would involve the demolition of structures as well as the construction of new structures on the campus. Given the prevalence of asbestos as a prevalent building material in the past, it is reasonable to assume that asbestos-containing material (ACM) would be encountered during demolition activities. All demolition activities would be performed in a manner consistent with Occupational Safety and Health Administration standards, AQMD Rule 1403, and National Emission Standards for Hazardous Air Pollutants.

Further analysis will determine risks related to hazardous materials on or near the project site. If any contaminated soil is encountered, it would be removed and disposed of in accordance with all applicable regulations governing hazardous waste.

During project operation, medical wastes, standard janitorial, and paint chemicals, as well as minor amounts of pesticides and/or herbicides for landscaped areas would be used. These chemicals would be secured and safely stored and disposed of, and are not anticipated to pose risks to the public or the environment. With the exception of these chemicals, no other chemicals would be routinely used, transported, or disposed of during project operation. This issue will be analyzed further in the EIR.

- 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?

As discussed in response to Item VIII) (a), it is likely that ACM would be encountered during demolition activities on the project site. Compliance with asbestos removal and demolition regulations would minimize the risk of release into the environment. There is also potential that excavation activities would uncover contaminated soil, but standard construction practices would be observed so that any released hazardous materials would be appropriately contained and remediated as required by local, state, and federal law.

No reasonably foreseeable upset and accident conditions are expected during project operation, as the few chemicals used for building and grounds maintenance would be securely stored. This issue will be analyzed further in the EIR.

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>c) Emit hazardous emissions or require the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?</p> <p>The project boundary is located within a quarter-mile of the Bravo Medical Magnet High School, located at 1200 N. Cornwell Street. As discussed in response to Item VIII) (b), it is possible that ACM and contaminated soils would be encountered during the construction period. These materials would need to be transported from the project site, although haul routes would not be located near the school. During project operation, hazardous wastes associated with the medical uses on the campus would be routinely transported, as is the case under existing conditions. This issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to U.S. Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?</p> <p>The Initial Study/Mitigated Negative Declaration prepared for the LAC+USC Wellness Center identified 21 on- and off-site locations within one-half mile of the project site as potentially contaminated, including a leaking underground storage tank on the site (1200 N State Street). A hazardous materials analysis will be conducted and this issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>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 result in a safety hazard for people residing or working in the project area?</p> <p>The project site is not located within an airport land use plan area or within 2 miles of a public airport or public use airport. Therefore, the proposed project would have no impact or contribute to a cumulative impact with regard to safety hazards near airports. Further analysis in the EIR is not warranted.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>f) For a project in the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?</p> <p>The project site is not located in the vicinity of a private airstrip. Therefore, the proposed project would have no impact or contribute to a cumulative impact with regard to safety hazards near airstrips; thus, further analysis in the EIR is not warranted.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</p> <p>The proposed project would not impair or physically interfere with adopted emergency response or evacuation plans. During construction, temporary lane closures may be required, but vehicular access to existing medical facilities would be maintained at all times. Additionally, the proposed project includes a new central vehicular drop-off location to serve the existing hospital and future outpatient facilities, which would likely enhance emergency response and access. Nonetheless, this issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</p> <p>The project site is in a highly urbanized area, and is not located adjacent to or intermixed with wildlands. Hazard Park, a 26.5-acre park located to the east of the project site (less than 0.10 mile away), is the only area with a large amount of vegetation, but is a managed and landscaped park with no connection to wildland areas. As such, there would be no risk of loss, injury, or death involving wildland fires. Since the proposed project would have no impact involving wildland fires, the project would also not contribute to a cumulative wildland fires impact. Therefore this issue will not be discussed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Mitigation: Should the Draft EIR identify significant hazards and hazardous materials impacts, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.</p>				

IX.	<u>HYDROLOGY AND WATER QUALITY</u> – Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	<p>Violate any water quality standards or waste discharge requirements?</p> <p>The proposed project would not substantially alter site drainage patterns or increase impermeable areas or runoff. There is no evidence of substantial erosion problems on the project site and the components of the project are not anticipated to result in deterioration of runoff water quality. Implementation of standard BMPs would decrease the potential for any erosion or sedimentation from the soil disturbing activities during the construction period. Standard construction practices related to erosion control, such as the use of tarps to cover stockpiled soil, would apply. During project operation, a campus-wide stormwater management system would be implemented, which would treat runoff before it leaves the site. Nonetheless, this issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	<p>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 that would not support existing land uses or planned uses for which permits have been granted)?</p> <p>Groundwater accounts for approximately 13 percent of water supply for the City of Los Angeles, but has accounted for as much as 30 percent of the total water supply in drought years (LADWP 2013). During the construction period, water would be used for activities including controlling fugitive dust emissions and mixing of concrete. Project operation would require water for cleaning, irrigation of landscaping, and the operation of sinks and restroom facilities within the buildings. The proposed project would result in an increase in the amount of permeable surface area on the site and would contribute to groundwater recharge. This issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	<p>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 that would result in substantial erosion or siltation on- or off-site?</p> <p>Minor alterations of the existing drainage patterns on the project site may occur related to the implementation of the campus-wide stormwater management system and due to construction of new facilities and improvements, but no change to the course of a stream or river would occur. This issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	<p>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 that would result in flooding on- or off-site?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

See response to Item IX.c), above. Project implementation is not anticipated to result in a substantial increase in the rate or amount of surface runoff and flooding on- or off-site. This issue will be analyzed further in the EIR.

- e) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

See responses to Items IX. (c) and (d) above. The proposed project is not expected to substantially increase runoff in the area. The project site is primarily impermeable, occupied by buildings and parking facilities. The proposed project would increase the permeability of the site through the addition of landscaping features and implement a campus-wide stormwater management system, which would be capable of handling stormwater runoff during project operation. Sedimentation and siltation of runoff during the construction period would be addressed through the implementation of standards BMPs. Nonetheless, this issue will be analyzed further in the EIR.

- f) Otherwise substantially degrade water quality?

As discussed above, the proposed project would include improvements to stormwater quality through the implementation of a campus-wide stormwater management system. Furthermore, construction-phase BMPs would be implemented in accordance with the County of Los Angeles Department of Public Works *Construction Site BMPs Manual (2007)* and the SWPPP that would be prepared in accordance with the requirements of the NPDES Stormwater General Permit. BMPs for the proposed project may involve scheduling, silt fencing, street sweeping and vacuuming, storm drain protection, stabilized construction entrances/exits, water conservation practices, paving and grinding operations, as well as procedures and practices pertaining to vehicle equipment cleaning, vehicle equipment fueling, and vehicle equipment maintenance. This issue will be analyzed further in the EIR.

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
g)	Place housing within a 100-year flood hazard area, as mapped on a Federal Flood Hazard Boundary Map or Flood Insurance Rate Map or other flood hazard delineation map? Although the proposed project may include housing for the medical center community, according to the Flood Insurance Rate Map prepared by the Federal Emergency Management Agency (FEMA), the project site is identified as "X" (i.e., no flood hazard). The project site is not located within a 100-year flood hazard area, and therefore would not place housing within a 100-year flood hazard area. Since the proposed project would have no impact with regard to placing housing in a 100-year flood hazard area, the project would also not contribute to a cumulative impact. This issue will not be discussed further in the EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h)	Place within a 100-year flood hazard area structures that would impede or redirect flood flows? The project is not located within a 100-year flood hazard area. Therefore, the proposed project would have no impact, and thus no potential to contribute to a cumulative impact. This issue will not be discussed in the EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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? Future development may include housing for the medical center community. Given that the area in which the proposed project would be located has less than a 0.2 percent annual chance of flooding each year currently and after project implementation according to the FEMA flood map for the area, the proposed project would not result in increased exposure to loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. As such, the project would have no impact and the project would not contribute to a cumulative impact with regard to flooding. Therefore, no further analysis in the EIR is warranted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>j) Inundation by seiche, tsunami, or mudflow?</p> <p>The project site is located approximately 16 miles from the Pacific Ocean, so there is negligible risk to the site from tsunamis. An artificial lake located one-half mile to the north of the site at Lincoln Park and Hazard Reservoir, an encapsulated reservoir adjacent to the eastern end of the project site, are unlikely to produce seiches that would affect the project site. Mudflows are unlikely to affect the project site due to the lack of proximity to wildland areas. Nonetheless, this issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Mitigation: Should the Draft EIR identify significant impacts to hydrology and water quality, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.</p>				

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

X. LAND USE AND PLANNING – Would the project:

- a) Physically divide an established community?

The proposed project would result in the implementation of a master plan for the LAC+USC Medical Center. The proposed project would include demolition and construction activities and would result in improved access to the site and new public outdoor space. New buildings would be introduced to the existing LAC+USC campus. Nearby residential communities would not be divided during construction and operation of the proposed project. Nevertheless, this issue will be analyzed further in the EIR.

- b) Conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project (including a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The project site is designated Public Facilities. The Public Facilities land use designation allows for public facilities such as fire stations, libraries, schools, parks, and police stations. The project site has a zoning designation of Public Facilities – PF. The proposed project would not change the medical use of the project site; rather it would introduce compatible buildings onto the project site. Proposed structures may vary in height and design compared to existing buildings. The proposed project would be subject to County of Los Angeles planning policies and guidelines. A consistency analysis with applicable land use plans and policies will be included in the EIR.

- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

County and City of Los Angeles habitat conservation plans and natural community conservation plans were checked, and it was found that the project site does not contain any areas within the purview of any applicable habitat conservation plan or natural community conservation plan. As such, the project would not conflict with these plans. Since the proposed project would not affect habitat conservation plans or natural community conservation plans, the project would not contribute to a cumulative impact. Therefore, no further analysis in the EIR is warranted.

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

XI. MINERAL RESOURCES – Would the project:

- 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?

The project site and its surroundings are in a developed area with no mineral resource recovery sites nearby. The project site is developed with the LAC+USC Medical Center. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that is of value to the region and the residents of the state. Since the proposed project would not affect mineral resources, the project would not contribute to a cumulative impact on mineral resources. No further analysis in the EIR is warranted.

- b) Result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land use plan?

The project site is not located in a locally important mineral resource discovery site and is not identified as such a site on a local general plan, including the conservation element of the general plan, specific plan, or other land use plan, as being a locally important mineral resource discovery site. Since the proposed project would not affect mineral resource recovery sites, the project would not contribute to a cumulative impact on mineral resource recovery sites. Therefore, no further analysis is warranted.

XII.	NOISE – Would the project result in:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or ordinance or applicable standards of other agencies? Increased noise levels are anticipated to occur in the vicinity of the proposed project during the construction phase. The project site is located in close proximity to sensitive receptors both on the site and in the immediate vicinity. The nearest noise-sensitive land uses consist of medical uses on the site itself. Residential uses and a school, the Bravo Medical Magnet High School, are located within one quarter mile of the project site. Construction and/or operational noise could exceed the exterior or interior noise standards contained in the County noise ordinance during construction. This issue will be analyzed further in the EIR.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? See response to Item XII.a), above. Increased groundborne vibration or groundborne noise levels are anticipated to occur in the vicinity of the proposed project during the construction phase. Operation of the proposed project would not have the potential to expose persons to or generate excessive groundborne vibration or noise levels. Given the proximity of the nearby residences and the on-campus medical facilities, the potential exists for construction of the proposed project to expose persons to or generate excessive groundborne vibration or noise levels. Therefore, this issue will be analyzed further in the EIR.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? Project-related operational noise would mostly be interior to buildings, but some would occur outdoors in the immediate vicinity, as a result of farmers markets and other local community events. These outdoor activities may be carried out in close proximity to the medical center and other sensitive receptors including residents and the school located in the immediate vicinity of the project site. The proposed project could also result in increased traffic noise. Therefore, this issue will be analyzed further in the EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</p> <p>Construction activities associated with the proposed project would involve the use of noise-generating construction equipment, resulting in a temporary and periodic increase in noise levels at specific locations. The increased noise level, including noise from trucks hauling debris during construction, could occur in close proximity to sensitive uses. This issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>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?</p> <p>The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport; therefore, no impacts would occur. Since no impact to airports would occur, there would be no potential contribution to a cumulative impact to airports. This issue will not be carried forward to the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>f) For a project in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?</p> <p>See response to Item XII.e), above. No private airstrips are located in the project vicinity. Thus, no one residing or working in the project area would be exposed to excessive noise levels associated with a private airstrip. Since no impact to airstrips would occur, there would be no potential contribution to a cumulative air traffic noise impact. This issue will not be carried forward to the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Mitigation: Should the Draft EIR identify significant noise impacts, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.</p>				

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

XIII. POPULATION AND HOUSING – Would the project:

- a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure)?

The proposed project consists of a master plan that would be used to guide future development of the LAC+USC Medical Center campus and would influence the delivery of health care services and health related community programs. One of the guiding principles of the proposed project would be to maximize access to the medical center. Additionally, the proposed project may include the development of on-campus housing units. Improved medical delivery and access to the medical center may result in indirect growth. This issue will be analyzed further in the EIR.

- b) Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?

The proposed project would include the implementation of a master plan for the LAC+USC Medical Center. It would introduce medical-related, office, and community uses onto the project site. Any on-site medical community housing that is demolished may be replaced on-site. No construction of off-site housing is anticipated. This issue will be analyzed further in the EIR.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Substantial displacement of people is not anticipated as part of the Master Plan, but this issue will be analyzed further in the EIR.

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

XIV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

i) Fire protection?

Fire protection services in the project area would be provided by the City of Los Angeles Fire Department. Fire Station #2, located at 1962 E. Cesar Chavez Avenue, is located approximately 1 mile from the project site. The proposed project may result in intermittent access restrictions for emergency responders during construction. The County would implement traffic control plans in construction areas to accommodate first responders and emergency vehicles and ensure that access would not be obstructed. Operation of the proposed project would introduce new medical-related, office, residential, commercial, and community space uses onto the project site. The proposed buildings and uses may increase the need for fire services. This issue will be analyzed further in the EIR.

ii) Police protection?

Police protection services on-site are currently provided by the Los Angeles County Sheriff's Department. Streets and areas surrounding the campus are policed by the Los Angeles Police Department (LAPD). The Hollenbeck Community Police Station located at 2111 E. First Street is located about 1.5 miles from the project site. The proposed project would include demolition and construction activities associated with the development of medical-related, office, and community space uses. The number of visitors to the campus may increase under implementation of the proposed Master Plan. Impacts to police services will be analyzed further in the EIR.

iii) Schools?

It is possible that development under the Master Plan may include some housing for biomedical research staff; however the proposed project would not be expected to generate a significant demand for public school services. Nonetheless, this issue will be evaluated further in the EIR.

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
iv) Parks? The proposed project would include the future development of a park to be located at the current location of the central plant. This issue will be analyzed further in the EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities? The project would not result in significant population growth that could result in demand for other public facilities or services, since a substantial number of new housing units are not proposed as part of the Master Plan. However, this issue will be evaluated further in the EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

XV. RECREATION

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

The proposed project is not expected to significantly increase the use of existing neighborhood parks or regional parks such that substantial physical deterioration of the facilities would occur or be accelerated. The proposed project would actually develop new park and recreation space on the campus. Nonetheless, this issue will be analyzed further in the EIR.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

The Master Plan would include the development of a park to be located on the current location of the central plant. Additionally, the proposed project would develop outdoor public areas on the project site. This issue will be analyzed further in the EIR.

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
<p>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 intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</p> <p>Construction and operation of the proposed project would result in increased vehicle trips to the site and may alter access to the existing LAC+USC Medical Center campus site. Parking would also be provided under the proposed project. A detailed traffic impact analysis will be prepared for the proposed project and included in the EIR.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>b) Conflict with an applicable congestion management program, including LOS and travel demand measures, or other standards established by the county Congestion Management Agency for designated roads or highways?</p> <p>Construction and operation of the proposed Master Plan could increase congestion levels, degrade LOS, and interfere with travel demand and other standards for congestion management. A detailed traffic impact analysis will be prepared for the proposed project. Conclusions of the traffic impact analysis will be included in the EIR.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that would result in substantial safety risks?</p> <p>The proposed project would not include any components that would result in a change in air traffic patterns, including either an increase in air traffic levels or a change in location that would result in substantial safety risks. Since there would be no impacts on air traffic patterns, there would be no contribution to cumulative impacts on air traffic patterns. Therefore, this issue will not be carried forward to the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p> <p>There are no significant changes associated with the proposed project that would result in an increase in hazards due to a design feature or incompatible uses. Nonetheless, this issue will be analyzed further as part of the traffic impact analysis in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>e) Result in inadequate emergency access?</p> <p>The proposed project may result in intermittent access restrictions during construction. The County would implement traffic control plans in areas where construction is occurring to accommodate first responders and emergency vehicles, and ensure that emergency access is not obstructed. Implementation of the proposed project would alter and/or introduce new visitor and emergency access points to the LAC+USC Medical Center. This issue will be analyzed further the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities or otherwise decrease the performance or safety of such facilities?</p> <p>The proposed project would improve pedestrian mobility within and to the project site. The proposed project would not result in changes to the public transportation system that would conflict with adopted policies plans or programs, and may actually enhance connections to public transportation. Nonetheless, this issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>g) Result in inadequate parking capacity?</p> <p>Construction and operation of the proposed project would result in increased vehicle trips to the site and may alter access to the existing LAC+USC Medical Center campus site. However, additional parking would also be provided under the proposed project. While CEQA no longer requires an analysis of parking, the potential changes to existing parking and the potential effects of proposed parking changes during construction and operations will be analyzed in the EIR.</p> <p>Mitigation: Should the Draft EIR identify significant transportation/traffic impacts, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? The proposed project would introduce new multi-story structures onto the site, which would increase wastewater usage compared to existing conditions. The project site is located in an urban area that is currently served by wastewater infrastructure. The proposed project would follow all applicable wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board. This issue will be analyzed further in the EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects? The proposed project would introduce new structures onto the project site. The proposed buildings would increase the demand for water and would generate wastewater. The proposed project would not include new or expanded water or wastewater treatment facilities. In addition, it is not anticipated that the project would require the construction or expansion of water or wastewater treatment facilities. Nonetheless, this issue will be analyzed further in the EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new stormwater drainage facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects? The project site is located in a developed area that is adequately served by the existing storm drain system. Construction-related activities may result in the alteration of existing facilities. This issue will be analyzed further in the EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? The proposed project would require the use of water during both construction and operation. The project will comply with applicable ordinances. This issue, including proposed water consumption will be analyzed further in the EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
e)	<p>Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to existing commitments?</p> <p>The project would include uses or activities that would generate wastewater and require treatment. An analysis of the proposed Master Plan development's effect on wastewater treatment will be conducted and included in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	<p>Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</p> <p>The proposed project would produce solid waste during both construction and operation. Adequate landfill capacity exists to accommodate any construction debris. If disposal were to occur at an off-site location, it would be handled in accordance with Los Angeles County regulations. Nonetheless, this issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g)	<p>Comply with federal, state, and local statutes and regulations related to solid waste?</p> <p>Disposal of all solid waste generated by the proposed project would comply with federal, state, and local statutes and regulations related to solid waste. Nonetheless, this issue will be analyzed further in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Mitigation: Should the Draft EIR identify significant impacts to utilities and service systems, appropriate mitigation measures will be proposed to reduce impacts to less than significant to the extent practicable.</p>					

Potentially Significant Impact
 Less-than-Significant Impact with Mitigation
 Less-than-Significant Impact
 No Impact

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?

As stated in above, the proposed project would have the potential to affect the following resources, which will be carried forward for analysis in the EIR: aesthetics; air quality; biological resources section a), c), d), e); cultural resources, geology and soils section a), b), c), d); greenhouse gas emissions; hazards and hazardous materials section a), b), c), d), g); hydrology and water quality section a), b), c), d), e), f), j); land use and planning section a), b); noise section a), b), c), d); population and housing; public services; recreation; transportation and traffic section a), b), d), e), f), g); and utilities and services systems. The following environmental areas have been determined to have no impact, and thus will not be carried forward into the EIR: agriculture and forest resources, biological resources section b), c); geology and soils section e); hazards and hazardous materials section e), h); hydrology and water quality section g),h),i); land use and planning section c); mineral resources; noise section e), f); transportation and traffic section c).

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
<p>b) Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)</p> <p>The EIR will analyze the proposed project's potential to result in cumulative impacts in conjunction with other past, present and future projects. This means the proposed development under the Master Plan will be compared to other past, current and probable future projects. The following environmental areas will be carried forward for analysis of potential significant impacts: aesthetics; air quality; biological resources section a), c), d), e); cultural resources, geology and soils section a), b), c), d); greenhouse gas emissions; hazards and hazardous materials section a), b), c), d), g); hydrology and water quality section a), b), c), d), e), f), j); land use and planning section a), b); noise section a), b), c), d); population and housing; public services; recreation; transportation and traffic section a), b), d), e), f), g); utilities and services systems. The following environmental areas have been determined to have no impact, and thus no potential to contribute to a cumulative impact: agriculture and forest resources, biological resources section b), c); geology and soils section e); hazards and hazardous materials section e), h); hydrology and water quality section g),h),i); land use and planning section c); mineral resources; noise section e), f); transportation and traffic section c) . ,</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>c) Does the project have environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly?</p> <p>The EIR will analyze the proposed project's potential to result in significant air quality, noise, and traffic impacts on individuals in the project area or expose construction workers or other individuals on the site to contaminated soils and groundwater or hazardous materials and wastes during construction and demolition activities. These were the environmental areas initially scoped with a potential to have environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly. However, the EIR will consider impacts to all environmental resource areas identified in this checklist in the Draft EIR. This topic will be analyzed further in the EIR.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LAC+USC Medical Center Campus Master Plan EIR Scoping Meeting
 Comment Sheet/Oja de Comentarios/意見表



Name/Nombre/姓名:

MARTHA L. PORTER

Affiliation/Affiliación 單位

CENTRAL JUVENILE HALL @ Eastlake

Address/Dirección/地址:

1605 SEATTLE AVE, 90033

Phone Number / Teléfono / 電話

323.595.3657

Email Address / Correo electrónico / 電郵

mporter6@yahoo.com

① Environmental Impact Report (EIR)

Theodore Payne Foundation could be contracted to assist landscape design plan; delect-friendly plants and flowers. These plants are eco-friendly and require less water use. Horticulture will be important for the aesthetics.

② ADA Compliance; ^{keep it in} more ramps & slopes; ^{less} staircases

③ METRO - Please get MTA involved, especially for delivering the elderly & disabled. Public transportation/transit ~~is~~ ^{complex} is needed for various areas of the ~~building~~ ^{patient} In-

^{Out-} ~~patient~~ ^{patient} areas. Right now, only the ^{① DASH - Boyle Heights} MTA #605 goes, the ^{② MTA #70/71} actually stop ~~at~~ ^{at} the entrance.

Please return this comment sheet at the sign in table or you may also submit your comments by mailing to:
 County of Los Angeles Department of Public Works
 Attention: Clarice Nash, Project Manager
 900 South Fremont Avenue, Alhambra, California 91803

Please have your organization do a study on ~~these~~ these drop-off points/areas.

Or by email to cnash@dpw.lacounty.gov
 Comments need to be submitted and received by June 18, 2014.

LAC+USC Medical Center Campus Master Plan EIR Scoping Meeting
 Comment Sheet/Oja de Comentarios/意見表



Name/Nombre/姓名: Dr. Tom Williams
 Affiliation/Affiliación 單位: Citizens Coalition Safe Community
 Address/Dirección:/地址: 4117 Barrett Rd LA 90032-1712
 Phone Number / Teléfono / 電話: 323-528-9682
 Email Address/ Correo electrónico/ 電郵: ctwi

Schedule June 18 - Sep 15 Prep.
 Sept 15 - Nov / Pub Comts
 "Nov. 2014" Nov

Certification

Schedule needs revision
 Recmd.

Circulate EIR Draft - Nov 20
 Com. Response Nov 20 - Jan 15
 FEIR Circul Jan 15 - Feb 15
 BOS Certifica/ Prog Appr Feb 15-28
 Temporary Injunction March 1

Please return this comment sheet at the sign in table or you may also submit your comments by mailing to:
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 900 South Fremont Avenue, Alhambra, California 91803

Or by email to cnash@dpw.lacounty.gov
 Comments need to be submitted and received by June 18, 2014.

LAC+USC Medical Center Campus Master Plan EIR Scoping Meeting
Comment Sheet/Ojs de Comentarios/意見表



Name/Nombre/姓名:

Roberto Avila

Affiliation/Affiliación 單位

LAC+USC Medical Center Employee

Address/Dirección:/ 地址:

Phone Number / Teléfono / 電話

(323) 226-6832

Email Address/ Correo electrónico/ 電郵

roavila@dhslacounty.gov

Ensure that plan includes consideration
for special needs access.

People with disabilities have to walk/roll the
longest as the facility is currently designed

Please return this comment sheet at the sign in table or you may also submit your comments by mailing to:
County of Los Angeles Department of Public Works
Attention: Clarice Nash, Project Manager
900 South Fremont Avenue, Alhambra, California 91803

Or by email to cnash@dpw.lacounty.gov
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LAC+USC Medical Center Campus Master Plan EIR Scoping Meeting
 Comment Sheet/Oja de Comentarios/意見表



Name/Nombre/姓名:

Daniela Oder

Affiliation/Afiliación 單位

Employee, LAC+USC

Address/Dirección:/地址:

1200 N. State, IPT C4E100, LA 90033

Phone Number / Teléfono / 電話

Email Address/ Correo electrónico/ 電郵

doder@usc.edu

- Don't build a parking structure that blocks the view from Clinic Tower. The view is designed to be the main architectural feature of the building & is available to the public as a corridor runs along inside it. The view is all the way to downtown
- = the 2040 vision is very cluttered
- I suggest that the new building be designed to be compatible with General Hospital, or alternatively ^{the Mission style} of the nursing school ^{@ Zorah Mission}
- Please do not use patterned concrete on ^{any of} the ~~the~~ walkways. Patients w/ wheelchairs ^{+ canes}, many delivery carts, etc., traverse the ramps & need smooth surfaces.
- I like the design of Woman's Hospital. Many people in L.A. use Woman's. Try to save some archit. features.

Please return this comment sheet at the sign in table or you may also submit your comments by mailing to:
 County of Los Angeles Department of Public Works
 Attention: Clarice Nash, Project Manager
 900 South Fremont Avenue, Alhambra, California 91803

Or by email to cnash@dpw.lacounty.gov
 Comments need to be submitted and received by June 18, 2014.



Edmund G. Brown Jr.
Governor

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



Ken Alex
Director

Notice of Preparation

May 19, 2014

To: Reviewing Agencies
Re: LAC+USC Medical Center Master Plan
SCH# 2014051061

Attached for your review and comment is the Notice of Preparation (NOP) for the LAC+USC Medical Center Master Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Clarice Nash
Los Angeles County
900 South Fremont Avenue
Alhambra, CA 91803

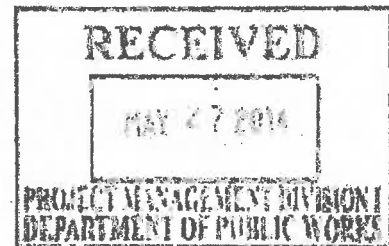
with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency



**Document Details Report
State Clearinghouse Data Base**

SCH# 2014051061
Project Title LAC+USC Medical Center Master Plan
Lead Agency Los Angeles County

Type NOP Notice of Preparation
Description The proposed LAC+USC Medical Center Master Plan Project consists of a master plan that is envisioned over a period of 25 years, that would be used to guide future development of the LAC+USC Medical Center campus, and would influence the delivery of health care services and health related community programs. Development under the Master Plan would include construction of new and renovated medical-related, office, commercial, residential, community open space, and parking uses and demolition of existing buildings and structures to accommodate new development.

Lead Agency Contact

Name Clarice Nash
Agency Los Angeles County
Phone 626 300 2363 **Fax**
email
Address 900 South Fremont Avenue
City Alhambra **State** CA **Zip** 91803

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets Zonal Street, Mission Road, Marengo Street, State Street
Lat / Long
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways I-5, 10, SR 110, 101
Airports
Railways UPRR, Metro,
Waterways Los Angeles River
Schools Several
Land Use Z: PF
GPD: PF

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Department of Housing and Community Development; Caltrans, District 7; Air Resources Board; Department of Toxic Substances Control

Date Received 05/19/2014 **Start of Review** 05/19/2014 **End of Review** 06/17/2014

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

2014051001

Project Title: LAC+USC Medical Center Master Plan

Lead Agency: County of Los Angeles Department of Public Works Contact Person: Clarice Nash
Mailing Address: 900 South Fremont Avenue Phone: 626.300.2363
City: Alhambra Zip: 91803 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Los Angeles

Cross Streets: Zonal Street, Mission Road, Marengo Street, State Street Zip Code: 90033

Longitude/Latitude (degrees, minutes and seconds): N/W Total Acres: 1,725,000

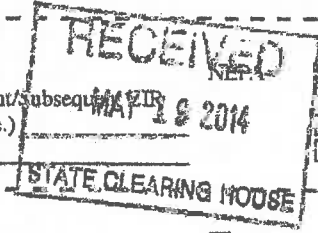
Assessor's Parcel No.: Section: Twp.: Range: Base:

Within 2 Miles: State Hwy #: I-5, I-10, SR-110, SR-101 Waterways: Los Angeles River

Airports: N/A Railways: Union Pacific, Metro, M Schools: Several

Document Type:

- CEQA. [X] NOP [] Draft EIR [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent (Prior SCH No.) [] EA [] Final Document
[] Neg Dec [] Other: [] Draft EIS [] Other:
[] Mit Neg Dec [] Other: [] FONSI



Local Action Type:

- [] General Plan Update [] Specific Plan [] Rezone [] Annexation
[] General Plan Amendment [X] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Land Division (Subdivision, etc.) [] Other:

Development Type:

- [] Residential: Units Acres Employees
[] Office: Sq.ft. Acres Employees
[] Commercial: Sq.ft. Acres Employees
[] Industrial: Sq.ft. Acres Employees
[] Educational:
[] Recreational:
[] Water Facilities: Type MGD
[] Transportation: Type
[] Mining: Mineral
[] Power: Type MW
[] Waste Treatment: Type MGD
[] Hazardous Waste: Type
[X] Other: Medical Center Campus Master Plan

Project Issues Discussed in Document:

- [X] Aesthetic/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[] Agricultural Land [] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [] Forest Land/Fire Hazard [X] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [] Wetland/Riparian
[X] Biological Resources [] Minerals [X] Soil Erosion/Compaction/Grading [] Growth Inducement
[] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Cumulative Effects
[] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [] Other:

Present Land Use/Zoning/General Plan Designation:

Zoning: Public Facilities (PF) General Plan Designation: Public Facilities (P)

Project Description: (please use a separate page if necessary)

The proposed LAC+USC Medical Center Master Plan Project consists of a master plan that is envisioned over a period of 25 years, that would be used to guide future development of the LAC+USC Medical Center campus, and would influence the delivery of health care services and health related community programs. Development under the Master Plan would include construction of new and renovated medical-related, office, commercial, residential, community open space, and parking uses and demolition of existing buildings and structures to accommodate new development.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NOP Distribution List

County: LOS ANGELES MG

SCH# 2014051061

Resources Agency

- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Nicole Wong
- California Coastal Commission
Elizabeth A. Fuchs
- Colorado River Board
Tanya Trujillo
- Dept. of Conservation
Elizabeth Carpenter
- California Energy Commission
Eric Knight
- Cal Fire
Dan Foster
- Central Valley Flood Protection Board
James Herota
- Office of Historic Preservation
Ron Parsons
- Dept of Parks & Recreation
Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery
Sue O'Leary
- S.F. Bay Conservation & Dev'L. Comm.
Steve McAdam
- Dept. of Water Resources Resources Agency
Nadell Gayou

Fish and Game

- Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division
- Fish & Wildlife Region 1
Donald Koch

- Fish & Wildlife Region 1E
Laurie Harnsberger
- Fish & Wildlife Region 2
Jeff Drongesen
- Fish & Wildlife Region 3
Charles Amor
- Fish & Wildlife Region 4
Julie Vance
- Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- Fish & Wildlife Region 6
Gabrina Gatchel
Habitat Conservation Program
- Fish & Wildlife Region 6 I/M
Heidi Sickler
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

- Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- Depart. of General Services
Public School Construction
- Dept. of General Services
Anna Garbeff
Environmental Services Section
- Dept. of Public Health
Jeffery Worth
Dept of Health/Drinking Water
- Delta Stewardship Council
Kevan Samsam

Independent Commissions, Boards

- Delta Protection Commission
Michael Machado
- Cal EMA (Emergency Management Agency)
Dennis Castrillo

- Native American Heritage Comm.
Debbie Treadway
- Public Utilities Commission
Leo Wong
- Santa Monica Bay Restoration
Guangyu Wang
- State Lands Commission
Jennifer DeLong
- Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Business, Trans & Housing

- Caltrans - Division of Aeronautics
Phillip Crimmins
- Caltrans - Planning
Terri Pencovic
- California Highway Patrol
Suzann Ikeuchi
Office of Special Projects
- Housing & Community Development
CEQA Coordinator
Housing Policy Division

Dept. of Transportation

- Caltrans, District 1
Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North
- Caltrans, District 4
Enk Alm
- Caltrans, District 5
David Murray
- Caltrans, District 6
Michael Navarro
- Caltrans, District 7
Dianna Watson

- Caltrans, District 8
Dan Kopulsky
- Caltrans, District 9
Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Jacob Armstrong
- Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

- All Projects
CEQA Coordinator
- Transportation Projects
Nesamani Kalandiyyur
- Industrial Projects
Mike Tollstrup
- State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance
- State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- State Water Resources Control Board
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances Control
CEQA Tracking Center
- Department of Pesticide Regulation
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- RWQCB 1
Cathleen Hudson
North Coast Region (1)
- RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- RWQCB 3
Central Coast Region (3)
- RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
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- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)

- Other _____
- _____
- _____
- _____
Conservancy

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, SUITE 100

LOS ANGELES, CA 90012-3606

PHONE (213) 897-0362

FAX (213) 897-0360

TTY (213) 897-4937

*Flex your power!
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May 27, 2014

Ms. Clarice Nash
Los Angeles County
900 South Fremont Ave.
Alhambra, CA. 91803

RE: IGR/CEQA No. 140531/NY
NOP/LAC+USC Medical Center Master Plan
1,725,000 SF of New Developments
SCH# 2014051061
Vicinity: LA/I-10/I-5

Dear Ms. Nash:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the LAC+USC Medical Center Master Plan, which will add 1,725,000 SF of new developments throughout the campus.

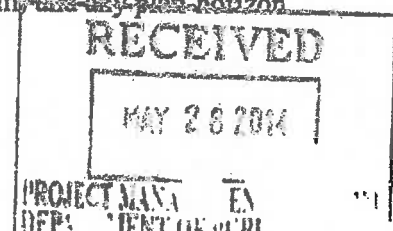
To fully analyze and evaluate the impacts of this project on the State transportation system, a traffic study in advance of the DEIR should be prepared. Please reference the Caltrans Traffic Impact Study Guide, which can be accessed on the Internet at:

http://www.dot.ca.gov/hq/top/offices/ocp/igr_ceqa_files/tisguide.pdf

Listed below are some elements of what should be included in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to I-5 & I-10 and nearest access on & off ramps.
2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. Caltrans may use indices to check results and any differences or inconsistencies must be thoroughly explained.
3. Analysis of ADT, AM, and PM peak-hour volumes for both existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects (see next item) and any plan horizon years.

"Caltrans improves mobility across California"



4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments. For example: existing + project + other projects + other growth.
5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
 - description of transportation infrastructure improvements
 - financial costs, funding sources and financing
 - sequence and scheduling considerations
 - implementation responsibilities, controls and monitoring

Any mitigation involving transit, HOV, or TDM must be justified and its effects conservatively estimated.

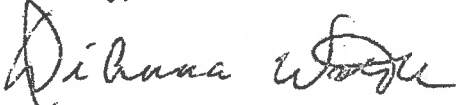
6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The following ratio should be estimated: Additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guidelines). That ratio would be the projects equitable share responsibility.

For purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth.

We look forward to reviewing the DEIR and expect to receive a copy from the State Clearinghouse. In the spirit of mutual cooperation, Caltrans would like to extend a meeting invitation to the lead agency and project traffic consultant to discuss the traffic analysis study area and methodology, potential traffic impacts, and possible mitigation.

If you have any questions regarding this response, please call Mr. Nerses Yerjanian, the Project Coordinator, at (213) 897-6536 and refer to IGR/CEQA # 140531/NY.

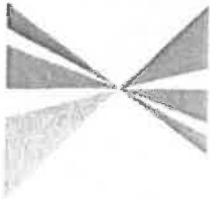
Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

SOUTHERN CALIFORNIA



ASSOCIATION of GOVERNMENTS

Main Office

618 West Seventh Street
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Associated Governments

May 29, 2014

Ms. Clarice Nash, Project Manager
County of Los Angeles Department of Public Works
Project Management Division I
900 South Fremont Avenue
Alhambra, California 91803-1331
Telephone: (626) 300-2363
E-mail: cnash@dpw.lacounty.gov

RE: SCAG Comments on the Notice of Preparation of an Environmental Impact Report for the LAC+USC Medical Center Master Plan Project [SCAG NO. IGR8041]

Dear Ms. Nash:

Thank you for submitting the Notice of Preparation of an Environmental Impact Report for LAC+USC Medical Center Master Plan Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of an Environmental Impact Report for LAC+USC Medical Center Master Plan Project. Located on several parcels of land owned by the County of Los Angeles and surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles, the proposed project consists of a master plan that would be used to guide future development of the LAC+USC Medical Center campus over the next 25 years.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to sunl@sacag.ca.gov providing, at a minimum, the full comment period for review. If you have any questions regarding the attached comments, please contact Lijin Sun at (213) 236-1682 or sunl@sacag.ca.gov. Thank you.

Sincerely,

Jonathan Nadler,
Manager, Compliance and Performance Assessment

¹ SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

**COMMENTS ON THE NOTICE OF PREPARATION OF AN ENVIRONMENTAL
IMPACT REPORT FOR THE LAC+USC MEDICAL CENTER MASTER PLAN
PROJECT [SCAG NO. IGR8041]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

2012 RTP/SCS Goals

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

SCAG 2012 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012 RTP/SCS Goals		
Goal		Analysis
RTP/SCS G1:	Align the plan investments and policies with improving regional economic development and competitiveness.	Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference
RTP/SCS G2:	Maximize mobility and accessibility for all people and goods in the region.	Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference
etc.		etc.

RTP/SCS Strategies

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscsc.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

Regional Growth Forecasts

The Environmental Impact Report for the LAC+USC Medical Center Master Plan Project should reflect the most recently adopted SCAG forecasts. To review the most recently adopted SCAG forecasts, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>, which consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. The forecasts for the region and applicable jurisdictions are below.

Forecast	Adopted SCAG Region Wide Forecasts		Adopted Unincorporated County of Los Angeles Forecasts		Adopted City of Los Angeles Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	1,159,100	1,399,500	3,991,700	4,320,600
Households	6,458,000	7,325,000	336,100	405,500	1,455,700	1,626,600
Employment	8,414,000	9,441,000	266,100	318,100	1,817,700	1,906,800

MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscsc.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: http://rtpscsc.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

June 17, 2014

Clarice Nash, Project Manager
Department of Public Works
Project Management Division I
900 S. Fremont Avenue
Los Angeles, CA 91803-1331

Dear Ms. Nash:

PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT, LAC+USC MEDICAL CENTER MASTER PLAN PROJECT – 2051 MARENGO STREET, CITY OF LOS ANGELES (FFER #201400081)

The Notice of Preparation and Initial Study for an Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and the Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. The subject property is entirely within the City of Los Angeles, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

LAND DEVELOPMENT UNIT:

1. Without the use of a site plan, the Land Development Unit cannot make specific access and water system requirements at this time. Specific access and water system requirements will be addressed with submittal of plans. Tenant Improvement Plans are required to be submitted to the Fire Department's Engineering Building Plan Check Unit in Commerce.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

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AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY

CALABASAS
CARBON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY

DIAMOND BAR
DUARTE
EL MONTE
GARDENA
GLENORA
HAWAIIAN GARDENS
HAWTHORNE

HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY
INGLEWOOD
IRVINDALE
LA CANADA FLINTRIDGE
LA HABRA

LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER
LAWDALE
LOMITA
LYNWOOD

MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT
PICO RIVERA

POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALMUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

2. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.
3. Fire Department requirements for access, fire flows, and hydrants are addressed during the building permit stage.
4. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
5. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic and emergency response issues.
6. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.
7. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department-approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
8. All access devices and gates shall comply with California Code of Regulations, Title 19, Articles 3.05 and 3.16.
9. All access devices and gates shall meet the following requirements:
 - a. Any single gated opening used for ingress and egress shall be a minimum of 26 feet in-width, clear-to-sky.
 - b. Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
 - c. Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way, and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
 - d. All limited access devices shall be of a type approved by the Fire Department.
 - e. Gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.
10. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review, prior to implementation.

11. The development may require fire flows up to 5,000 gallons per minute at 20 per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of buildings (square footage of each floor of each building), the types of construction used and the verification of the installation on an automatic fire sprinkler system.
12. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.
 - d. Hydrants shall be required at the corner and mid-block when a cul-de-sac depth exceeds 200 feet on a commercial street.
 - e. A cul-de-sac shall not be more than 500 feet in length when serving land zoned for commercial use.
13. Automatic fire sprinkler systems are required.
14. Should any questions regarding the Land Development Unit comments, please contact FPEA Wally Collins at (323) 890-4243 or via e-mail at Wally.Collins@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. It is recommended that a Phase I Instructional Record Review be prepared for the site to identify potential onsite contaminated areas prior to any soil disturbance. A statistically valid number of soil samples must be taken from the identified contaminated areas and analyzed for contaminants of concerns.

If significant contamination(s) above background concentrations are detected, the contamination must be mitigated under oversight of a local or State governmental agency. Furthermore, a soil management plan must be prepared for unknown contamination that may be encountered during excavation or grading activities.

Clarice Nash, Project Manager
June 17, 2014
Page 4

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

A handwritten signature in black ink that reads "Frank Vidales". The signature is written in a cursive style with a large initial "F".

FRANK VIDALES, CHIEF
FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:jl



LOS ANGELES
CONSERVANCY

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2488 OFFICE
213 623 3909 FAX
laconservancy.org

Submitted by email

Clarice Nash, Project Manager
County of Los Angeles Department of Public Works
Project Management Division I
900 S. Fremont Avenue
Alhambra, CA 91803-1331
Email: cnash@dpw.lacounty.gov

RE: LAC + USC Medical Center Master Plan, Notice of Preparation

June 18, 2014

Dear Ms. Nash,

On behalf of the Los Angeles Conservancy, I am writing to comment on LAC + USC Medical Center Master Plan. We believe there are a number of historic buildings within the LAC + USC Medical Center campus boundaries that should be taken into consideration when developing a new master plan. The Conservancy strongly urges you to undertake a thorough historic resources evaluation to help identify potentially eligible historic resources. This type of baseline documentation will be essential in making and evaluating decisions about the master plan.

Because the LAC + USC Medical Center Master Plan will be in effect for 25 years, the Conservancy believes there is a need to reevaluate resources as they come of age within the timeframe and "life" of the new master plan. This will offer an opportunity to determine if a structure is deemed eligible for either local, California or national registers. This is important in regards to the County's obligation as the lead agency to follow the California Environmental Quality Act (CEQA).

In recent years the Conservancy has worked with several Los Angeles-area universities and campuses that have undertaken comprehensive new master plans, including Loyola Marymount University, the University of Southern California, and the Port of Los Angeles. Through the respective environmental review processes we worked closely with these institutions to achieve master plans that met the project's objectives while balancing the need to maintain important historic resources.

The Conservancy understands the County is proposing a Landmark Adaptive Reuse zone within the campus and encompassing the historic 1933 General Hospital building. We are encouraged by this and look forward to learning more as details



become available. In addition to the General Hospital, other historic resources on campus may also benefit from a similar tool. This includes the 1909 Old Administrative Building and the 1958 Osteopathic Hospital (also known as the Women's and Children's Hospital). The Old Administrative Building has been previously identified as a historic resource, and was sensitively rehabilitated in 2003. To our knowledge, the Osteopathic Hospital has not yet been identified but the Conservancy believes it may be eligible locally and for the California Register and/or the National Register. It should be recognized and treated as such through the EIR and CEQA process.

I. Osteopathic Hospital

Opened in 1958, the Late Moderne-style Osteopathic Hospital was designed by noted architects Paul R. Williams and Adrian Wilson. Primarily H-shaped in plan, the building's central 9-story portion is flanked by two, seven-story wings. Its simplicity of form and use of spare surfaces are hallmarks of the Late Moderne style. Architects Paul R. Williams and Adrian Wilson were individually prolific Los Angeles architects, and they often collaborated together. Los Angeles native Paul R. Williams was the first African-American member of the American Institute of Architects and an architect of remarkable range. Known for his private homes for Hollywood elites, Williams also designed commercial and institutional buildings, churches, and public housing developments. He became the first African-American architect of a Los Angeles County-owned structure with the 1951 Psychiatric Hospital at the County USC campus, which he designed with Adrian Wilson.

Like Williams, Adrian Wilson was responsible for many municipal projects. For Los Angeles County alone, Wilson built civic centers, libraries, schools and hospitals in the booming postwar years, and was on the team (along with Paul Williams) that designed the Hall of Administration and the County Courthouse at the Los Angeles Civic Center. In the 1960s, the Anaheim Convention Center and the U.S. Embassy in Vietnam were among his commissions.

Williams and Wilson designed several hospital buildings for the County during its midcentury expansion and modernization era. These included the Post Polio Unit at Rancho Los Amigos Hospital and the Harbor General Hospital. At the County USC campus, they were responsible for five buildings built between 1951 and 1962 when the hospital was modernized; four of them were demolished for the LAC+USC Medical Center Replacement Hospital project in the early 2000's. The Osteopathic Hospital is the sole contribution by these prominent architects to County USC, and one of the few midcentury buildings existing at the site.

II. California Environmental Quality Act

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with... historic environmental qualities...and preserve for future generations...examples of major periods of California history."¹ To this end, CEQA "requires

¹ Public Resources Code §21001 (b), (c).



public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”²

Courts often refer to the EIR as “the heart” of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts.³ CEQA Guidelines require a range of alternatives to be considered in the EIR, with an emphasis on options capable of “substantially lessening” the project’s significant adverse environmental effects. The Conservancy anticipates seeing a range of preservation alternatives considered within the EIR that avoid and/or lesson adverse impacts on eligible historic resources within the master plan boundaries.

III. Conclusion

The Conservancy encourages the County to develop the master plan with planning that recognizes and plans for the preservation and reuse of historic buildings, including both the Old Administrative Building and the Osteopathic Hospital. These, and other historic buildings, can be incorporated into the Landmark Adaptive Reuse zone, or can be rehabilitated and reused for compatible uses such as research, education, or community/public service.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education. For over twenty-five years, the Conservancy and its volunteer Modern Committee have worked to raise awareness about Los Angeles’ unique collection of mid-20th century modernist structures.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions, and let me know how best to follow-up on this issue and address our concerns.

Sincerely,



Adrian Scott Fine
Director of Advocacy

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

³ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.



From: [Nash, Clarice](#)
To: [Anaya, Mario](#)
Subject: FW: Scoping Comments - LAC+USC Medical Center Master Plan Project
Date: Wednesday, June 25, 2014 9:17:23 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

-----Original Message-----

From: Diaz, Roderick [<mailto:DiazR@scrra.net>]
Sent: Tuesday, June 17, 2014 3:54 AM
To: Nash, Clarice
Subject: Scoping Comments - LAC+USC Medical Center Master Plan Project

Dear Ms. Nash:

Concerning requested comments on the forthcoming EIR for LAC+USC Medical Center Master Plan Project, Metrolink would like to request that the project scope include a full analysis of the regional scope of travel to the LAC+USC Medical Center. The analysis would also evaluate the potential for a Metrolink Station to serve the LAC+USC Medical Center in the vicinity of the existing El Monte Busway Station (near North State Street and Pomeroy Street, serving Metro and Foothill Transit).

A Metrolink station at LAC+USC Medical Center would serve our San Bernardino Line, the most heavily patronized route on the entire seven-route Metrolink system. Our analysis shows that there are 12,387 jobs within 0.50 miles of the proposed station. This station would meet the basic requirements of job concentration within a station perimeter and rank in the top ten Metrolink stations for highest job concentration within a 0.5 mile radius. A LAC+USC Medical Center Metrolink Station could, therefore, serve as an important mechanism to mitigate regional travel impacts to the LAC+USC Medical Center and to provide important travel options for passengers from throughout Southern California, given the station's short connections to Los Angeles Union Station, the regional rail hub.

The proposed station fits within the project description and meets all six goals of the Master Plan. We would be happy to provide more information, as requested, and to work with you to explore all solutions related to regional transportation related to the project area.

With regards,

Roderick

Roderick Diaz
Director, Planning & Development

Metrolink
One Gateway Plaza, Floor 12
Los Angeles, CA 90012

Tel (213)452-0455
Cell (213)435-4193

diazr@scrra.net <<mailto:diazr@scrra.net>>

Roderick Diaz
Director, Planning & Development
213-452-0455 office
213-435-4193 mobile

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From: Nash, Clarice
To: Paul Davis
Cc: David Attaway; Anava, Mario; Christine Frías
Subject: RE: Notice of Preparation for LAC+USC Medical Center Master Plan
Date: Wednesday, June 18, 2014 9:01:57 AM

Thank you and we will send the Notice of Availability directly to you
Clarice Nash

From: Paul Davis [mailto:paul.j.davis@lacity.org]
Sent: Wednesday, June 18, 2014 8:30 AM
To: Nash, Clarice
Cc: David Attaway
Subject: Notice of Preparation for LAC+USC Medical Center Master Plan

Ms. Nash,

The City of Los Angeles Department of Recreation and Parks has reviewed the Notice of Preparation and Initial Study for the proposed LAC+USC Medical Center Master Plan. We concur with the determination of preparing an EIR, and will want an opportunity to receive and review the Draft EIR. Because of the location of our Hazard Park adjacent to the Medical Center campus and nearby Lincoln Park, we would like to review your analysis of potential impacts on these recreational resources from any increases in on-campus housing.

Please send your Notice of Availability to me directly to ensure the maximum amount of time to review the DEIR.

--
Paul J. Davis
Environmental Specialist, DRP/P&C
221 N. Figueroa St., Suite 100
Los Angeles, CA 90012
(213) 202-2667
(213) 202-2611 FAX



Metro

June 18, 2014

Clarice Nash
Project Manager
County of Los Angeles Department of Public Works
900 S. Fremont Avenue
Alhambra, CA 91803-1331

RE: LAC+USC Medical Center Master Plan

Thank you for the opportunity to comment on the proposed Medical Center Master Plan at 2051 Marengo Street. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro bus lines operate Mission Road, Marengo Street, and Zonal Avenue adjacent to the proposed project and several Metro bus stops are directly adjacent to the proposed project. The following comments relate to bus operations and the bus stops:

1. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final project.
2. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. (For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5190). Other municipal bus may also be impacted and should be included in construction outreach efforts.
3. LACMTA encourages the installation of bus shelters, benches and other amenities that improve the transit rider experience. The County should consider requesting the installation of such amenities as part of the development of the site.
4. Final design of bus stops and surrounding sidewalk area must be Americans with Disabilities Act (ADA) compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.
5. Metro has two bus lines that layover on the Hospital property in two different locations: off of Zonal Street behind a former out-patient clinic, and on State Street at the top of the hill. Coordination should be made with Metro's Service Planning Department to maintain layover zones.
6. Metro should be considered as part of the long range planning efforts at the Hospital. All transit services should be considered as part of the planning process to serve the area more efficiently and thoroughly.

7. Please contact Scott Page at 213-922-1228 or PageS@metro.net to coordinate transit planning efforts.

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at SullivanMa@metro.net. LACMTA looks forward to reviewing the Draft EIR. Please it to the following address:

LACMTA Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,



Nick Saponara
Development Review Manager, Countywide Planning

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a $\frac{1}{4}$ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both "peak hour" and "daily" refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction's TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

DATE: June 18, 2014, 3:30pm

TO: Clarice Nash, Project Manager, County of Los Angeles Department of Public Works
Project Management Division I, 900 S. Fremont Ave., Alhambra, CA 91803-1331
cnash@dpw.lacounty.gov 626-300-2363 M-Th

CC: Gloria Molina
Jose Huizar, CD 14 Member
Lincoln Heights NC
Boyle Heights NC
LA-32 NC

FROM: Dr. Tom Williams
Citizens Coalition for Safe Communities
Sierra Club, Angeles Chapter Transportation Committee

SUBJECT: LACounty + USC Medical Center Master Plan 2015-2040
RE: SCH: 2014051061/ 06/17/2014 Notice of Preparation - Comments

We deeply appreciate the opportunity to present public comments regarding this important program and its development in the east-central neighborhoods of the City of Los Angeles. We look forward to the preparation of thorough, adequate, and complete documents for compliance with CEQA and the Environmental Impact Report (EIR) along with the Plan, itself. At this time we find the Plan to be too incomplete and inconsistent for comments, and comments herein are focused entirely on the scope and development of the DEIR.

Our comments are summarized as below.

Dr. Tom Williams
Citizens Coalition for a Safe Community
Sierra Club, Angeles Chapter, Transportation Comte.
4117 Barrett Rd, Los Angeles CA 90032-1712
ctwilliams2012@yahoo.com 323-528-9682

COMMENTS:

General

County-USC

Total isolation of the County (LACo) facilities and activities from those of USC renders the entire NOP/IS, and Scope for the DEIR as totally incomplete and must be adequately and completely developed in the DEIR. These plans and projects are intimately integrated and such avoidance/isolation is totally without merit to avoid the cumulative and related impacts especially for traffic, parking, transportation, aesthetics, noise, stormwater, water supplies, sewerage, and social-economic consideration of the Project and its surroundings. Concentration of medical services in one 0.5mi diameter location also puts at risks concentrated major emergency facilities subjected to seismic risks and the ability of such services to be available to the population of central and east LA areas.

The DEIR must provide all relationships of USC and LACo and clearly identify all agreements, contracts, and relationships and agreements, formal or implied, between the two organizations and their influences on selection and development of facilities and activities within the LACo Project Area.

Project Site, Area, and Sphere of Influence

Inadequate, Incomplete Project Description - also many drawings provided appear to be inconsistent with others presented leading to confusion as to the Project scope, area, and site(s). The DEIR must provide adequate and complete drawings which consistently identify the Project site(s), the Project Area, and its/their sphere/radius of influence.

No Purposes and Needs are expressed in any comparable format and quantified with regard to the alternatives considered and the proposed "project" selected and must be thoroughly presented in the DEIR.

Not all County properties involved, and exclusions must be justified and explained in the DEIR otherwise the Project is subject to further comments and actions regarding segmentation of development.

All properties, ownerships, long-term leases, and current zoning are required in the DEIR along with delineations.

Other private, City, and LACo projects lie within the Project Area or sphere of influence of the LACo project, e.g., Soto Str. improvements, LA River Parkland, Lincoln Park, Hazard Park, Caltrans I-5/I-10 interchange, etc. must be related in the DEIR in setting, assessment, and mitigation.

Service Area

Current and future service areas for the Medical Center and Project have not been identified and must be included in the DEIR.

As other LACo medical facilities exist throughout the County, service areas of all facilities must be delineated in the DEIR and those of the Project clearly delineated.

The Project has very strong relations with other LACo facilities in central LA (within <10mi of the Project) which may influence the functioning of both the Project and the dependent LACo facilities and their required accesses, services and facilities within the Project area, including the USC portions.

Existing Plans

The NOP does not incorporate the current land use policies, plans, and projections of the USC Medical Center for facilities, activities, and service areas and reliability of emergency/medical services for urban areas. The DEIR must reflect all setting, assessment, and mitigation for the current USC Plan and its FEIR and any other properties within the Project Area, Marengo-Mission-Valley-Soto.

The NOP does not incorporate the current land use policies, plans, and projections of the Southern California Association of Governments for 1) population growth, 2) more transit related urban development, and 3) distribution and reliability of emergency/medical services for urban areas within their jurisdiction.

Proposed Project does not reflect the MTA/METRO (& Caltrans) plans for transportation facilities and transit systems, routes, and capacities. The Project lies within the service corridors of many road/rail transit systems, but the Project has not incorporated the existing and proposed transportation facilities into the gateways and pathways of the alternatives and proposed Project. Many opportunities exist to include LACo properties into more transport-focused alternatives (see below) which must be explored in the development of the Plan and DEIR.

LACity Mobility Element and General Plan (LADoT/DCP) has been prepared and developed without considerations of the LACo, and the Project appears not to reflect the current Mobility Element policies and planning approached during the same development period. The DEIR must incorporate plans of SCAG, MTA, and Mobility Element into the transportation sector setting and assessment.

The City's LA River Restoration represents a major project adjacent to this Project Area and would contain major attractions and traffic generation within the Project vicinity. The DEIR must incorporate plans of the LA City LA River Corridor and associated effects especially for Mission Road, Daly/Marengo, and the I-5/I-10 Interchange/Ramp Intersection into the transportation sector setting and assessment.

The LACo Enterprise Zone and City CRA-Descendent Agencies have/had plans for adjacent areas and corridors which are being reorganized, and the Project area setting and assessments must incorporate such plans especially for the Valley Blvd/UPRR corridor along the north side of the Project Site/Area.

Alternatives

We request the following Alternatives:

Transit-Focused Alternative with elimination of at least 50% of all proposed parking spaces within the Project Site with perimeter-gateways and more directly link with the existing transit corridors and facilities of the Project Area, including I-10/Transit, Marengo, Mission Road, Soto, and Valley Blvd.;

Major Development Center Alternative with at least 50% more floor area as part of a Public Private Partnership venture, as the LACo MTA is undertaking for Measure R transportation projects and the High Desert Corridor but herein focused on Medical, Insurance, Research, Social Services, associated commercial and recreational services, etc..

Environmentally Superior - Development Center Alternative involving at least 50% more floor area of similar improvements, including larger subsurface facilities, LEED-Platinum rating, 100% retention/recharge LID stormwater, integrated transit/gateway village-complexes and less than 10% of proposed parking.

Sectors

Although little or no analyses or initial study report were provided as part of the NOP/Checklist, the Project will be reviewed as part of an EIR. Some specific issues are recommended as part of the setting and assessment and mitigation as needed.

Air Quality and Transportation

The Project lies at the Inchange of two of the most congested freeways in LACo along with major arterials between downtown LA City and all areas of East and NE LA and the western San Gabriel Valley. As such, the air quality is expected to be badly degraded compare to many others further from freeway interchanges. No air quality information has been provided for scoping, and current air quality must be monitored and used for both the effects on intake air quality for Project and as a baseline for impacts from increased congestion in this corridor and around the Interchange.

Traffic counts for all roadways and intersections must be monitored and numerical information provided for current conditions. Based on such, the DEIR must establish those expected with the development of the USC Campus Plan and then those of the proposed Project. Once the baseline and projected traffic flows are established, additional improvements must be modeled in order to establish values for the mitigative and compensatory measures, and prospective improvements incorporated into the Project to benefit user access and transit-supported service participants.

Hydrology and Water Resources

Existing facilities have been constructed with little concern with stormwater runoff and based on its close proximity to the LA River, hydraulic effects on the flood levels of the River. Current LACo and LACity policies regarding low impact development and 100-year flood levels appear not to be incorporated in the available plans for the Project. The DEIR must include a thorough analysis of existing runoff and projection of the current Project and focus on reductions for those projections by at least 50% in volume by local recharges and releases prolonged for at least 3-5 times projected times of concentrations or over a 72 hour whichever greater.

Water resources are very constrained now and in the future. The Project lies within a major easterly watershed for the LA River, and the area has a high groundwater capacity for receiving recharge of collected stormwater. Such waters could be transferred for use in the nearby (500ft) proposed "Piggyback" Recreation area of the LARiver rather than directly released to the lined channel.

Because of the single high wastewater flow production from this Project Area (both LACo and USC), an opportunity exists to develop recycling of advanced treated wastewater and perhaps graywaters for local area reuse and irrigation of the LACity and LARiver recreational areas. Such activities could be incorporated into the Project and related alternatives.

Environmental Justice - Area and Service

The Project will serve a very large area predominately from communities in NE, East, Downtown, and Central LACity. However, adequate and complete setting and assessment require the clear establishment of the existing and future (2040) service areas and populations to be served by the DEIR. The DEIR must also consider the appropriate levels for medical and emergency services required for such populations and communities served/to be served and how the Project would either be maintained and brought into norms for such services for all communities.

Cumulative Effects (Other Projects and Activities)

The central issue at this CEQA stage is the apparent purposeful exclusion of any coordination between the USC and LACo facilities. Although integrated in many activities and proximity, the LACo's lack of incorporating any materials from the USC CEQA actions focuses attention on the cumulative effects of the two development programs which have supposedly not been coordinated, integrated, and assessed through the same CEQA process. The DEIR must provide settings, assessments, and mitigations for the various Project Area and vicinity projects mentioned here and elsewhere in the comments.

Additional Detailed Comments - format: page/paragraph, Doc.Text, Important Issue, Comment Initial Study, May 2014 Checklist

pdf-p.2/4 Project Location: The LAC+USC Medical Center is located at 2051 Marengo Street on several parcels of land owned by the County of Los Angeles and is surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles, in Los Angeles County. Specifically, the site is bounded by Zonal Street, Mission Road, Marengo Street, and Chicago Street. State Street bisects the project site.

2/4 a. The Project map, Fig. 2/p.8, does not include all County property-parcels included under the authority of the LA County Medical Center south of Marengo, west of Mission, and north of Zonal.

2/4 b. Neighborhood Council Areas are delineated by LACity ZIMAS along Zonal St. from Marengo - Soto. Official boundaries must be used for both Boyle Heights (south) and Lincoln Heights (north).

2/4 c. The "site" does not include all parcels owned by the County within the area and included in this Project - Master Plan. Change to Site(s) or change drawings and definition and enumeration of Site.

pdf-p.41 #16. Transportation/Traffic -

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Marengo-Daly/Mission/Richmond-I-5 Ramps is an existing hazardous intersection with major effects and measures required for emergency access from west and south, especially for LACounty Jail residents.

Incompatible uses in Future Recreational areas along west side of Mission Road south of Marengo/I-5 and continuing traffic of heavy duty and other trucks from UPRR/UPS west of Daly to I-5/I-10.

p.41/#16. There are no significant changes associated with the proposed project that would result in an increase in hazards due to a design feature or incompatible uses. Nonetheless, this issue will be analyzed further as part of the traffic impact analysis in the EIR.

The I-10/I-5 interchange/ramp intersection at Marengo/Mission Rd. is a hazardous, highly congested, often-blocked intersection which totally blocks all access to/from the south. Increased access to the Project will place at further risk any emergency access to the Project from the south.

Current parking along Valley Blvd. for visitors and employees and various pedestrian access points along the northerly USC and LACo perimeter encourage pedestrian crossing of the UPRR tracks and thereby increased activities and employment would encourage increase and continuation of highly dangerous pedestrian transportation access. The Project must halt all pedestrian access from uncontrolled crossings of UPRR.

p.41/#16 e) Result in inadequate emergency access?

Three major access corridors for the Project involve major bridge structures on the SW-Mission/I-5, SE-Soto/I-10, NE-Soto/UPRR, and NW-Mission/UPRR. Given the critical accessibility, the DEIR must thoroughly document and assess the viability of all four bridges to/from the Project Area.

41/#16 The proposed project may result in intermittent access restrictions during construction. The County would implement traffic control plans in areas where construction is occurring to accommodate first responders and emergency vehicles, and

Implementation of the proposed project would alter and/or introduce new visitor and emergency access points to the LAC+USC Medical Center. This issue will be analyzed further the EIR.

Access restrictions for such an emergency facility is not acceptable and would be a significant impact. A complete and adequate construction workplan must be provided for periods of construction of all phases of the Project.

ensure that emergency access is not obstructed.

Underpass for I-5 and ramp-access/exit turnings represent a major chokepoint which must have a specific, complete and adequate construction workplan provided for periods of construction of all phases of the Project.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities or otherwise decrease the performance or safety of such facilities?

As indicated above, Mobility Element General Plan, the MTA-METRO Transportation Plans, and SCAG urban and transportation plans have not been incorporated in the NOP/IS and must be thorough,

adequately, and completely integrated into the land use and transportation development of the Project and its current and recommended alternatives,

The proposed project would improve pedestrian mobility within and to the project site. The proposed project would not result in changes to the public transportation system that would conflict with adopted policies plans or programs,

The lack of integration between LACo and USC plans and environmental assessments and both lacking of integration of policies and plans of SCAG, MTA, and LACity Mobility clearly show the need for dramatic increase of local facilities to promote transit-based employee, visitor, and patient access to the Project Area gateways and coordination to eliminate the numerous congested roadways in the Project vicinity and their immediate and ongoing impacts on emergency services vehicles to Project Area..

...and may actually enhance connections to public transportation. Nonetheless, this issue will be analyzed further in the EIR.

Project gateways for emergency vehicles, pedestrians, and transit facilities must be improved and must dominate the current individual vehicle focus of the current proposed Project. Therefore we have requested the development and consideration of a Transit-focused (e.g., 50% reduction in car parking space) and Transit-dominated (e.g., 90% reduction) alternatives.

g) Result in inadequate parking capacity?

Based on current conditions...

LACity-Valley Blvd., Soto St., and Marengo are parking and passenger vehicle nightmares and the DEIR must fully document the current conditions and incorporate land use planning elements to address employee commuter elements and promote transit based commuting and accessing of the Project area and Site(s).

Construction and operation of the proposed project would result in increased vehicle trips to the site and may alter access to the existing LAC+USC Medical Center campus site.

However, additional parking would also be provided under the proposed project.

All other transportation agencies have documented declining car use and increasing congestion and are promoting multi-passenger vehicles, transit, and other rail/multiple purpose system and attempting to increase residential uses and densities and thereby promoting the improvement of transit services. Adding more single-occupant vehicle parking appears to contradict all State, Regional, County, and City promotions of mixed uses and corridor/village transit promotions.

Alternatives have been/are requested to reduce or virtually eliminate especially commuter employee parking with the Project Area and thereby be more supportive of the local, regional, State, and Federal transportation policies.

While CEQA no longer requires an analysis of parking, the potential changes to existing parking and the potential effects of proposed parking changes during construction and operations will be analyzed in the EIR.

This is a good decision and must be incorporated into the land use and transportation assessments for the Project, including origin-destinations, employees, and users/customers.

NOP Presentation p.6 Existing Campus

Project area does not equate to and is greater than text description of the Project Site.

Existing sites are less than those on p.7-8 and in NOP text, and more similar to those shown in p.4-5.

NOP Prt p.4-5 & 7-8 Master Plan - 2040

Project figure illustrated does not accord with text description and is much larger and complex.

NOP Prt p.11 Environmental Process - Schedule 2014-15

The schedule virtually eliminate meaningful public comment and reasonable review and responses to such public comments. Basically if implemented as below, without recommended changes, the LACo is inviting legal challenges, perhaps even at this initial level/stage.

NOP/Scoping (Public Review Period) May 19 –

DEIR Preparation

Jun

Jul

Aug

June 18, 2014

Sep 2014

Draft EIR (Public Review Period) - (Late Summer– Early Fall 2014)

Oct 1 - Nov 17

Final EIR/Mitigation Monitoring Report Program/Finding, Response, & Statement of Overriding Considerations Circulation

Jan 6 2015

Nov 2014

Deadline for FEIR comments**Feb 9 2015**

Board Approval Process

Feb 3-20 2015

Notice of Determination

Mar 3 2015

Deadline for Appeal of Determination

Apr 7 2015

**Overly aggressive schedule completion does not reflect effective and timely public participation
Recommended clarifications are provided.**

LAC+USC Medical Center Master Plan EIR

NOP

2/8 Potential Environmental Effects: The Initial Study contains a preliminary analysis of the environmental impacts of the proposed project in accordance with the CEQA Guidelines that identify 16 areas where impacts could occur. These impacts, which will be analyzed in detail in the Environmental Impact Report, include: aesthetics, air quality, biological...

As indicated above, thorough, adequate, and complete analyses, assessment, and mitigation must be provided especially for air quality, traffic, congestion, transit, stormwater capture/recharging, local wastewater recycling, and emergency services and access during construction and the in expected future severe traffic congestion in the vicinity.

USCMC/LACoMC

pdf Initial Study

6/ 4. Project Location: ...Center is located at 2051 Marengo Street on several parcels of land owned by the County of Los Angeles. The proposed Master Plan is for the entire LAC+USC Medical Center Campus,...entire campus is...project site...surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles, in Los Angeles County...bounded by Zonal Street, Mission Road, Marengo Street, and Chicago Street. State Street bisects the project site...

The DEIR must include a map with clear delineation of any, all State, LACo, LACity, USC, and other private properties. Furthermore, all long-term (>5 years) leases must also be clearly defined and delineated.

6/ Item 8 Description of Project:

6/8-1 The proposed LAC+USC Master Plan Project (proposed project) consists of a master plan that is envisioned over a period of approximately 25 years, that would be used to guide future development of the campus and would influence the delivery of health care services and health related community programs.

The Project description does not establish as to where and what the "Project" is and whether the Project is actually a non-specific development plan for creating many more typical projects. The DEIR must consider that the "Project" must be considered as a "Programmatic EIR" rather than a specific "Project EIR". As such the entire DEIR must be presented either as a Project-Specific or as a Programmatic EIR with suitable future reconsideration.

Other issues may be addressed after today's deadline.

Tom Williams

CITY OF LOS ANGELES
CALIFORNIA



ERIC GARCETTI
MAYOR

June 30, 2014

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WASTEWATER ENGINEERING SERVICES DIV.
2764 MEDIA CENTER DRIVE
LOS ANGELES, CA 90068
FAX: (323) 243-6216 OR
(323) 242-0211

Clarice Nash, Project Manager
COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS
Project Management Division I
900 S. Fremont Ave.
Alhambra, CA 91803-1331

File: SC.CE.

Dear Ms. Nash:

LAC+USC MEDICAL CENTER MASTER PLAN PROJECT-NOTICE OF PREPARATION-
ENVIRONMENTAL IMPACT REPORT

This is in response to your May 23, 2014 letter requesting a review of your proposed medical center project located at 2051 Marengo Street, Los Angeles, CA 90033. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<i>Existing</i>			
Offices	120 GPD/1000 SQ.FT	197,288 SQ.FT	(23,675)
Medical Offices	250 GPD/1000 SQ.FT	460,727 SQ.FT	(115,182)
Maintenance Facilities	30 GPD/1000 SQ.FT	31,000 SQ.FT	(930)
Utility Plant & Cooling Tower	170/1000 SQ.FT	20,938 SQ.FT	(3,559)
Warehouse & Storage	30/1000 SQ.FT	15,756 SQ.FT	(473)
Total			(143,819)
<i>Proposed</i>			
Hospital	70/ BED	450 BED	31,500
Retail	50 GPD/1000 SQ.FT	55,000 SQ.FT	2,750

RECEIVED

JUL 09 2014



Utility Plant & Maintenance	30 GPD/1000 SQ.FT	40,000 SQ.FT	1,200
Medical Offices	250/1000 SQ.FT	200,000 SQ.FT	50,000
Administrative Offices	250/1000 SQ.FT	265,000 SQ.FT	66,250
Offices	120/1000 SQ.FT	50,000 SQ.FT	6,000
Research Space	250/1000 SQ.FT	635,000 SQ.FT	158,750
Total			316,450
Net Total			172,631

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes four (4) discharge routes. The first discharge route is made up of two (2) 6-inch lines on Chicago St and Cummings St. The sewage from the two lines joins an 8-inch line on Marengo St before discharging to a 15-inch line on State St RW. The Second route includes an existing 8-inch line on Marengo St, and existing 12-inch line on Zonal Ave R/W. The sewage from both lines feed into a 12-inch line on Lord St before discharging into an 18-inch line on Cesar E Chavez Ave R/W. The third discharge route is through an existing 8-inch line on Mission Rd. The sewage from this 8-inch line joins the first and second discharge routes at an 18-inch line before discharging to a 21- inch line on Cesar E Chavez Ave R/W. The fourth route includes a 6-inch line on Cummings St, a 6-inch line on Zonal Ave, an 8-inch line and a 12-inch line on Mission Rd. The sewage from these lines feed into a 24-inch line on Alhambra Ave before discharging into a 48-inch line on Mission Rd. Figure 1 shows the details of the sewer system within the vicinity of the project and discharge routes. The current flow level (d/D) in all the lines cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
Route #1			
6	Chicago St.	*	706,323 GPD
6	Cummings St.	*	782,481 GPD
8	Marengo St.	*	229,323 GPD
21	Cesar E Chavez Ave.	*	2.47 MGD
27	Mission Rd.	42	6.5 MGD
30	Mission Rd.	15	8.6 MGD
27	Mission Rd R/W	31	4.9 MGD
48	Mission Rd.	58	30.78 MGD
Route #2			
8	Marengo St.	*	598,000 GPD
12	Zonal Ave R/W	*	641,424 GPD
12	Lord St.	10	1.03 MGD
8	Mission Rd.	*	324,311 GPD
21	Cesar E Chavez Ave.	*	2.47 MGD
27	Mission Rd.	42	6.5 MGD
30	Mission Rd.	15	8.6 MGD
27	Mission Rd R/W	31	4.9 MGD
48	Mission Rd.	58	30.78 MGD
Route #3			
6	Cummings St.	*	238,916 GPD
6	Zonal Ave R/W	*	315,877 GPD

8	Mission Rd.	*	229,323 GPD
8	Mission Rd.	*	166,160 GPD
24	Alhambra Ave	27	4.5 MGD
48	Mission Rd.	58	30.78 MGD

* No gauging available

The estimated flow that would be generated from your proposed project exceeds 20,000 GPD and therefore may have a significant impact on the sewer system capacity. Thus, detailed gauging is necessary to determine whether the sewer system is capable of safely accommodating the total flow for your proposed project. We have initiated a work order to gauge the designated critical locations in the project area. This process usually takes approximately three (3) to four (4) weeks. A detailed evaluation and response will be provided to you within one (1) to two (2) weeks upon receipt of gauging data. If this schedule is not acceptable, please call us to discuss options.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS

The City is developing a Green Street initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater

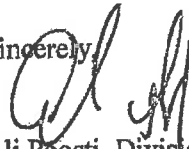
pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Projects Division at (213)485-3684.

Sincerely,

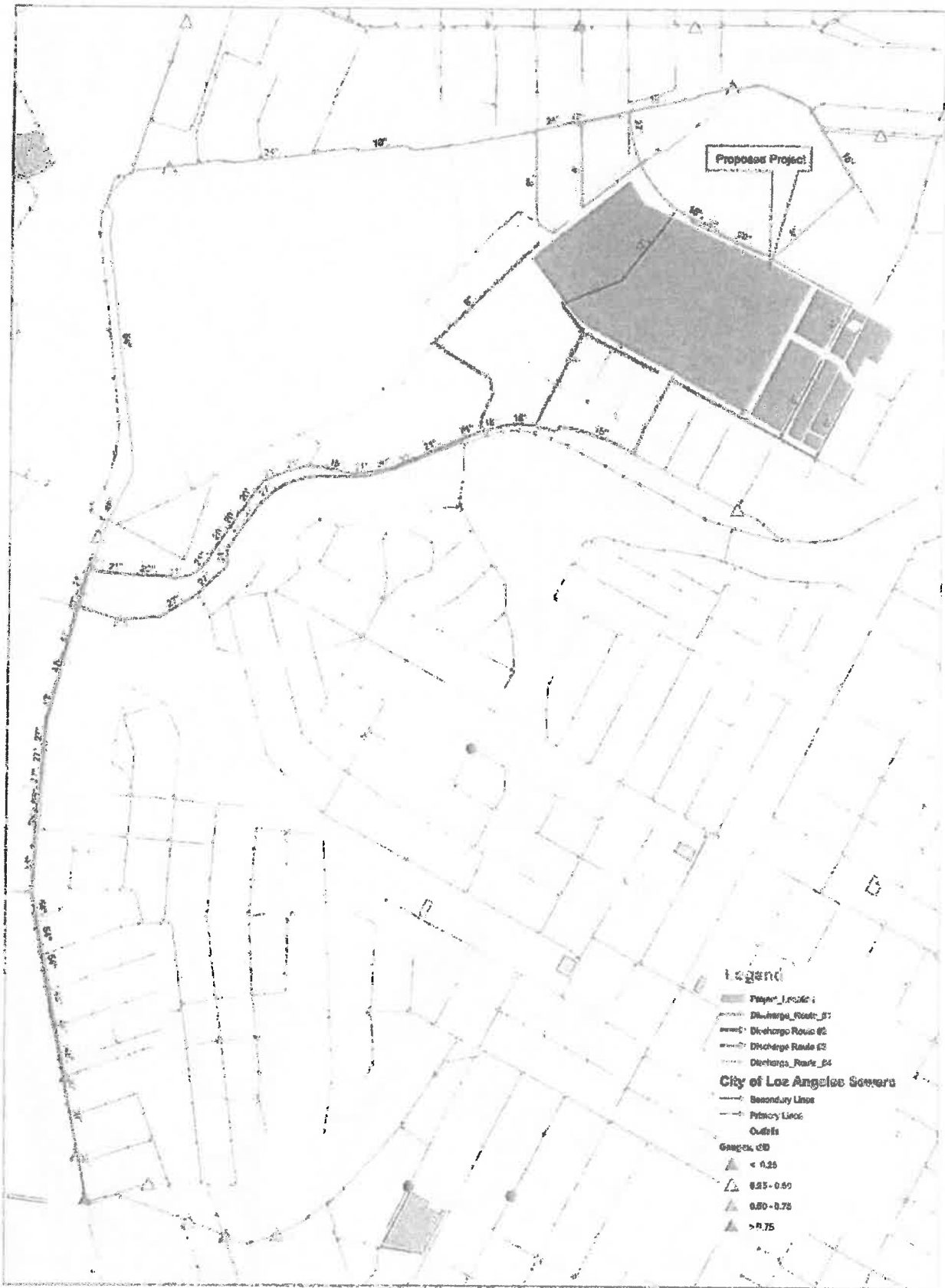


Ali Poosti, Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

KB/AP:tn

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, SAN
Daniel Hackney, SAN
Zemamu Gebrewold, SAN



Wastewater Engineering Services Division
 Bureau of Sanitation
 City of Los Angeles



FIGURE 1
LAC+USC Medical Center Master Plan
Sewer Map



Offices	120/1000 SQ.FT	50,000 SQ.FT	6,000
Research Space	250/1000 SQ.FT	635,000 SQ.FT	158,750
Total			316,450
Total			172,631

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Since our last response on June 30, 2014 detailed gauging data has been obtained. The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

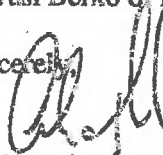
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8	Mission Rd.	*	166,160 GPD
24	Alhambra Ave	27	4.5 MGD
48	Mission Rd.	58	30.78 MGD

* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation may be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

Sincerely,

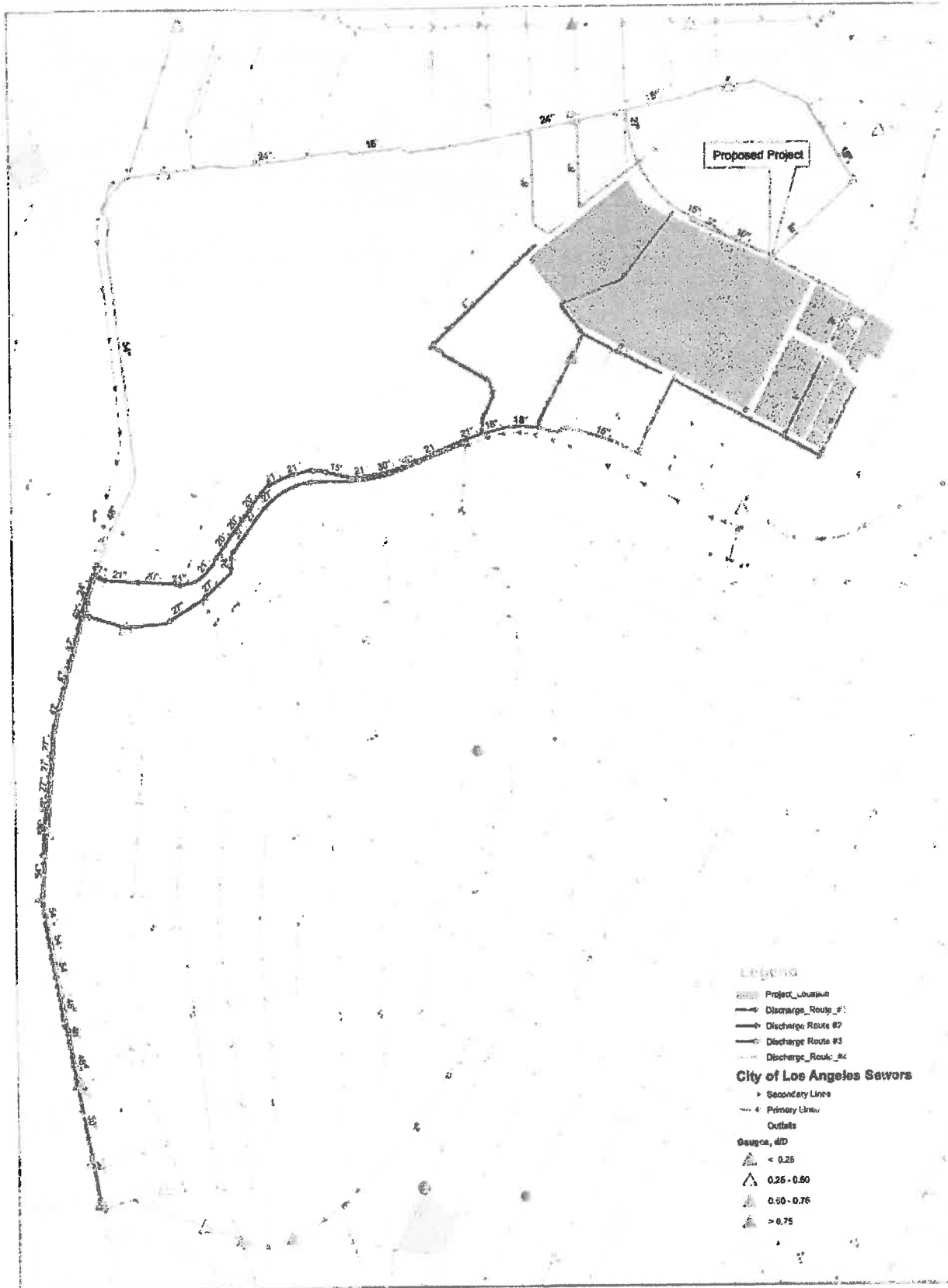


Ali Foosti, Division Manager
Wastewater Engineering Services Division

KB/AP:tn

Attachment: Figure 1 – Sewer Map

c: Zernamu Gebrewold, SAN



Wastewater Engineering Services Division
 Bureau of Sanitation
 City of Los Angeles



FIGURE 1
LAC+USC Medical Center Master Plan
Sewer Map

