Martin Luther King, Jr. Medical Center Campus Redevelopment

Findings of Fact and Statement of Overriding Considerations

(SCH #2010031040)

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I.A CERTIFICATION

FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE MARTIN LUTHER KING, JR. MEDICAL CENTER CAMPUS REDEVELOPMENT PROJECT (STATE CLEARINGHOUSE NUMBER 2010031040)

The County of Los Angeles (County) hereby certifies the Final Environmental Impact Report (EIR) for the Martin Luther King, Jr. Medical Center Campus Redevelopment project, located at 12021 Wilmington Avenue, in the unincorporated area of Willowbrook, County of Los Angeles, California, State Clearinghouse Number 2010031040. The EIR consists of Volume I: Draft EIR, dated August 31, 2010; Volume II: Technical Appendices to the Draft EIR, dated August 31, 2010; and Volume III: Clarifications and Revisions to the Draft EIR, Comment Letters on the Draft EIR, and Response to Comments, dated December 13, 2010. The EIR has been completed in compliance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines, the County General Plan, and all applicable federal, state, and local statutes and regulations that govern the management of environmental resources. The County Board of Supervisors has received, reviewed, and considered the information contained in the Final EIR, all hearings, and submissions of testimony from officials representing the County, as well as from other agencies, organizations, and private individuals with a particular vested interest in the project.

Having received, reviewed, and considered the foregoing information, recommendations of the County, as well as any and all other information in the record, and Section I herein, the County Board of Supervisors hereby makes findings pursuant to and in accordance with Section 21081 of the Public Resources Code as presented in Sections II through X of these Findings of Fact and Statement of Overriding Considerations.

I.B PROJECT LOCATION

The Martin Luther King, Jr. Medical Center Campus Redevelopment project (project) site is located on the existing 38-acre Martin Luther King, Jr. Medical Center Campus, at 12021 Wilmington Avenue, in the unincorporated area of Willowbrook, County of Los Angeles, California.

The project site is located approximately 3 miles north of State Route 91 (SR-91; Artesia Freeway), approximately 3 miles northeast of Interstate 710 (I-710; Long Beach Freeway), approximately 2 miles east of I-110 (Harbor Freeway), less than 1 mile south of East Imperial Highway, and less than 1 mile south of I-105 (Glen Anderson Freeway). The project site can be accessed from East 120th Street or from Wilmington Avenue.

The project site is bounded on the north by East 120th Street, on the east by Wilmington Avenue, on the south by a narrow alley separating the project site from the residential neighborhood that is largely located north of East 122nd Street, and on the west by Compton Avenue of Los Angeles. The project site is less than 1 mile north of the City of Compton, less than 1 mile south of the City of Los Angeles, and less than 1 mile west of the City of Lynwood.

The project site appears on the U.S. Geological Survey (USGS) 7.5-minute series South Gate topographic quadrangle.[1] Elevations at the project site range from 86 feet above mean sea level (MSL) to 88 feet above MSL.[2] The topography of the site can be generally characterized as flat.

I.C PROJECT GOAL AND OBJECTIVES

The goal of the project is to provide new campus improvements and to reopen a fully functional medical campus that meets the community needs for quality health care.

The County seeks to establish the Martin Luther King, Jr. Medical Center Campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce development, academic research and teaching, and economic development. The campus provides an opportunity to develop up to an additional 1,814,696 square feet for a mix of uses, including space for medical offices; commercial, retail, residential, recreation, and general offices; and any other development that will improve the community-based health program facility with a net new increase of 1,476,010 square feet.

Tier I Project Objectives

The County identified and prioritized the basic objectives that are important in achieving the project goals for Tier I:

- Revitalize the Martin Luther King, Jr. Medical Center Campus through the provision of comprehensive medical care
- Demonstrate leadership in sustainable planning and design
- Create a campus environment that encourages pedestrian movement and optimizes connectivity, staff interaction, and links to the community
- Develop a campus that is contextually integrated with the County and respects the surrounding communities
- Improve the efficiency and quality of staff and tenant services
- Maintain the 2,100-square-foot Genesis Clinic; 2,580-square-foot Oasis Clinic (old); 1,850-square-foot Oasis Clinic (new); 10,950-square-foot Registration Building; 226,818-square-foot Augustus F. Hawkins Comprehensive Mental Health Center; 187,676-square-foot Inpatient Tower; 7,878-square-foot Pediatric Acute Care; 26,355-square-foot Medical Records and Laundry; 24,103-square-foot Central Plant; 15,648-square-foot Plant Management; 52,276-square-foot North Support Building; 34,762-square-foot South Support Building; 124,391-square-foot Interns and Physicians Buildings; 3,922-square-foot Claude Hudson Auditorium; 1,100-square-foot MRI Building; and 12,265-square-foot Hub Clinic Building
- Provide a 24,700-building-gross-square-footage (BGSF) space to accommodate the Ancillary Building to house the cafeteria, administrative functions, and support services for the Multi-Service Ambulatory Care Center (MACC) and the Inpatient Tower
- Provide a 132,000-BGSF space to accommodate the MACC program

[1] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[2] Sapphos Environmental, Inc. 2010. Geographic Information System. Pasadena, CA.

- Provide 34,000 square feet of tenant improvements to accommodate support functions in the North Support, South Support, Interns and Physicians, and Plant Management Buildings
- Connect to an upgraded central plant to service the MACC, North Support Building, South Support Building, Inpatient Tower, and Interns and Physicians Building
- Provide a parking area to allow sufficient parking for patients, client, visitors, employees, and medical staff; site work; and landscaping
- Provide for a possible relocation of the MRI Building

Tier II Master Plan Objectives

The County identified and prioritized the basic objectives that are important in achieving the project goals for Tier II:

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

I.D PROJECT ELEMENTS

The project entails two tiers. Tier I would involve development of the new MACC Building and the Ancillary Building. Tier I would also include tenant improvements to the following existing buildings: North Support Building, South Support Building, and the Plant Management Building; site improvements; and potential relocation of the MRI Building.

Tier II of the project would entail the reuse, replacement, or removal of the existing MACC Building (which will be vacant following construction of the new MACC Building in Tier I) and reuse, replacement, or removal of the following: Emergency Room, Storage Building, and Cooling Towers.[3] Tier II construction may entail additional master-planned mixed-use development, which may include the potential for medical offices, general offices, commercial and retail space, residential units, recreational areas, and other development that is appurtenant to and compatible with the primary land use, in support of the campus.

To establish a program of development level for the mixed-use portion of Tier II, the currently undeveloped areas of the campus (undeveloped in this case includes parking lots and structures, such as parking structures and certain storage or loading areas, but not buildings) were calculated, and adjustments were made for buildings to be reused, replaced, or removed and developed, to obtain a surface area from which to calculate allowable build-out. A maximum build-out of this remaining area was calculated using maximum build-out criteria from the Los Angeles County Zoning Code restrictions applicable to the site. Initially, this maximum build-out number was in excess of 2 million square feet and included zoning code allowances of a maximum of three stories in building height and a minimum of 10-percent open space (i.e., areas without structures). To determine a more accurate level of development for Tier II, the following assumptions were added: (1) open space site-wide would remain a minimum of 10 percent to maintain some of the current

[3] However, the functions of these buildings would be substituted.

character of the site as an open and landscaped campus; (2) the site area to be set aside for the potential development of an up to 100-unit residential component, parking structures or parking lots, and walkways would be a maximum of 40 percent of the entire site; and (3) although a maximum of three stories would be allowed for new buildings, an average height of 2.5 stories was assumed.[4] With these assumptions added in, the maximum programmed development for Tier II could consist of up to 1,814,696 square feet.

Tier I of the project will result in a decrease of the existing square feet, as the functions of several existing buildings would be removed. Tier II of the project has the potential to result in a total floor area of up to 1,814,696 square feet (or a footprint of up to approximately 725,878 square feet) of new development. Given the net reduction in building floor area in Tier I, the net new development after completion of Tier I plus maximum build-out of Tier II is 1,476,010 square feet of floor area.

Tier I Project Development

Tier I of the proposed project would entail the development of two new buildings: the new MACC Building and the Ancillary Building, tenant improvements in existing buildings, site improvements, and potential relocation of the MRI Building. Project-level EIR analysis will be provided for Tier I.

Multi-Service Ambulatory Care Center Building

The proposed MACC Building would be a four-story building consisting of approximately 132,000 square feet of floor area. This building would house the walk-in clinic, outpatient imaging, outpatient surgery, and various other outpatient clinics that are currently operating in the existing MACC. The proposed building would most likely be of structural steel construction. The gravity system of the building would consist of lightweight fill over metal decking supported by steel beams and columns. Similar to the proposed Ancillary Building, the lateral-force-resisting system of the MACC Building can be any one of the following: moment frames, braced frames, or a combination of the two. The lateral-force-resisting system, whether moment frames or braced frames, would be located along the perimeter of the building, which would accommodate maximum flexibility for planning and space layout. The foundation for the new building would likely be a cast-in-place drilled pile foundation system.

Ancillary Building

The proposed Ancillary Building would be a two-story structure consisting of approximately 24,700 square feet of floor area. This building would house the campus kitchen and cafeteria, and administrative offices. The building would be constructed to the east of the new MACC. A new pedestrian footbridge would be provided at the east end of the building for connection to the existing Inpatient Tower for the transportation of materials and supplies. The bridge would most likely be constructed of steel, with a seismic joint at the Inpatient Tower.

[4] An average building size of 2.5 stories was used, although it is anticipated that the Tier II buildings would vary in size and may be taller than 2.5 stories.

The new building would most likely be structural steel construction. The gravity system of the building would consist of lightweight fill over metal decking supported by steel beams and columns. The lateral-force-resisting system for the building can be any one of the following: moment frames, braced frames, or a combination of the two. It is anticipated that the lateral-force-resisting system, whether moment frames or braced frames, would be located along the perimeter of the building, which would accommodate maximum flexibility for planning and space layout. The foundation for the new building would likely be a cast-in-place drilled pile foundation system.

Tenant Improvements

The tenant improvements would be performed in the North Support Building to provide space for the MACC administrative departments. The South Support Building would be reorganized to serve as the main warehouse for the MACC. The South Support Building may also serve as a central distribution center for other Los Angeles County healthcare facilities in the area. Other tenant improvements would be performed in the Interns and Physicians and Plant Management Buildings for support functions to the MACC.

Site Improvements

The site work would consist of a new parking terrace, relocated entrance to the facility, new parking lots, restriping of existing lots, and new landscaping at the entry of the new MACC and its surrounding area. A space for an emergency generator and a service yard with technical (tech) dock positions that connect mobile radiology equipment would also be provided.

In addition, site work would include improvements at 120th Street at the northern boundary of the proposed project site. These site improvements would entail removing the existing crosswalk and traffic signal at the new Oasis Clinic; adding a new crosswalk and traffic signal at the new campus (Medical Center Drive) entry; prohibiting curbside parking on both sides of 120th Street for a distance of approximately 300 feet east and 200 west of the new Medical Center Drive entrance;[5] adding a left-turn lane westbound at the new Medical Center Drive entrance; removing and replacing approximately 500 linear feet of street at Medical Center Drive entrance and/or constructing inlets and extending the public storm drain to remedy potential drainage defects; repairing and/or replacing the curb, gutter, and sidewalk where necessary; and planting additional street trees and landscape.

Tier I would be expected to generate approximately 150 temporary construction jobs and no new permanent or operational staff positions, as Tier I would require only existing staff to be shifted into the new Tier I facilities. It is not anticipated that any existing jobs would be eliminated as a result of the Tier I development.

Tier II Master Plan Development

Tier II of the project would entail the development of a campus-wide Master Plan. It is anticipated that the development described in the Master Plan would seek to prepare the project site for future mixed-use campus support development that would provide the health services necessary to respond to and address the needs of the community. Tier II would have the potential to build out approximately 1,814,696 square feet of development on the proposed project site with mixed uses,

[5] This would remove approximately 30 curbside parking spaces on 120th Street. Adequate off-street parking is proposed to be provided on-site at the campus to account for the removal of these curbside parking spaces.

including medical office, commercial, retail, office space, recreation, and other development in support of the campus. In addition, up to 100 residential units, to be developed at a multifamily density consistent with surrounding residential area multifamily development densities, are proposed in Tier II. Although these buildings would be vacated as a component of Tier I, the Tier II components would entail the reuse, replacement, or removal of the existing MACC Building, Emergency Room, Storage Building, and Cooling Towers.

The Tier II components, including the campus-wide Master Plan, are conceptual at this time and, therefore, will be discussed only in a programmatic level in the EIR, as permitted under CEQA. Once the detailed future development plans for Tier II components are prepared, consistent with the guidelines for programmatic EIRs under CEQA, the development projects under the campus-wide Master Plan will be examined in light of the program EIR analysis, to determine whether additional environmental document(s) must be prepared.

In accordance with §15168 of the State CEQA Guidelines, the program-level analysis that is provided in this EIR document for Tier II of the proposed project is intended to be prepared for a series of actions that can be characterized as one large project, such as a master plan. Through a programmatic EIR, the County seeks to provide the public, responsible agencies, and interested parties an opportunity for a more exhaustive consideration of the Tier II effects and alternative than would be practical in an EIR for each individual action; furthermore, the County can consider broad program-wide mitigation measures at an early time when there is greater flexibility to deal with basic problems or cumulative impacts. It is understood, however, that subsequent activities described within Tier II of the proposed project must be evaluated in light of the programmatic EIR to determine whether additional environmental document(s) must be prepared.

Although some variation in the distribution of these uses (i.e., percentage of the total) may occur when the project is implemented, the description of Tier II elements are a reasonable projection at this time of the land use distribution for the purposes of environmental impact assessment.

Tier II development would be expected to generate approximately 150 temporary construction jobs that would vary according to the development and will be determined in the future Master Plan. Tier II also has the potential to result in a range of new permanent or operational staff positions. The County has estimated a conservative number of up to 100 jobs that could be associated with Tier II of the project.[6]

I.E LEADERSHIP IN ENERGY AND ENVIRONMENTAL DESIGN ELEMENTS

On January 16, 2007, the County Board of Supervisors approved the Countywide Energy and Environmental Policy. The Countywide Energy and Environmental Policy consists of programs that are designed to institute energy conservation and environmental stewardship into County efforts.[7]

[6] This estimate is a conservative assessment based upon coordination with the County. These numbers are based solely upon estimates regarding what could occur as part of this project and do not reflect known or actual trends although labor forecasts related to labor statistics in the area that were completed by the U.S. Bureau of Labor Statistics (BLS) were reviewed. The U.S. BLS, November 2009 Monthly Labor Review, which is available at http://www.bls.gov/opub/mlr/2009/11/mlr200911.pdf, projected the following for the year 2018: jobs in the health care and service assistance field will account for approximately 12% of the available non-farm jobs; retail and trade would account for 10%; professional business would account for 14%; and leisure and hospitality would account for approximately 9% of the available non-farm jobs in the U.S. in 2018.

[7] County of Los Angeles. Accessed August 2010. "Energy and Environmental Efforts." Web site. Available at: http://green.lacounty.gov/green_buildings.asp

As part of the Countywide Energy and Environmental Policy, the County has established requirements for capital construction. The County requires that all new County buildings (greater than 10,000 square feet) under the County's Capital Project Program, which includes capital improvement and development projects, be Leadership in Energy and Environmental Design (LEED) certified at the silver level.[8]

Development of the new MACC Building and the Ancillary Building under Tier I of the proposed project are currently registered with the U.S. Green Building Council under LEED for New Construction (LEED-NC).[9] The County will seek LEED silver certification for the MACC Building and the Ancillary Building.[10] In addition, any County buildings that are more than 10,000 square feet that are developed under Tier II of the proposed project will be required to seek a minimum LEED silver certification. The LEED program recognizes and promotes a project's success in five areas: (1) sustainable sites, (2) water efficiency, (3) energy and atmosphere efficiencies, (4) materials and resources, and (5) indoor environmental quality. In addition, the federal government has a program titled Green Guide for Healthcare Construction (GGHC), which is designed to help hospitals navigate through the LEED program. The proposed project would incorporate energy efficient and sustainable strategies throughout the construction, development, and operation of the proposed project.

The development of Tier I and Tier II of the proposed project would utilize and incorporate materials to ensure visual consistency and continuity at the proposed project site and within the surrounding area. The proposed project must adhere to the design goals presented in the campus planning and programming report that was prepared for the MLK Medical Center Campus by HMC Architects in 2009. The report stated that the proposed architecture should achieve the following:

- Respect the existing fabric of buildings;
- The selection of exterior material and architectural forms should make reference to the material palette of the existing campus while incorporating contemporary materials and building technologies to project the future vision of this campus;
- The juxtaposition and massing of the new buildings should be strategically located to allow visitors a pleasurable aesthetic experience; and
- The open spaces created in between the buildings are designed the variations in size, shape, and scale that are conducive to pedestrian travel through the campus.[11]

I.F EIR PROCESS

The County prepared an EIR for the project in accordance with CEQA, the State CEQA Guidelines, the County General Plan, and all applicable federal, state, and local statutes and regulations that govern the management of environmental resources.

[8] County of Los Angeles. Accessed August 2010. "Energy and Environmental Efforts." Web site. Available at: http://green.lacounty.gov/green_buildings.asp

[9] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

[10] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

[11] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

The County has taken steps to encourage the public to participate in the environmental process for the project. These steps included, but were not limited to, inviting the public to community workshops prior to and during the preparation of the Initial Study (dated March 8, 2010, Volume II, Appendix A). On March 8, 2010, the County circulated a Notice of Preparation (NOP) for a Draft EIR for the project to the State Clearinghouse and to various federal, state, regional, and local government agencies. The NOP was also distributed to interested individuals who attended the community workshops that were held at the Claude Hudson Auditorium on the MLK Medical Center campus on December 2, 2009, and January 7, 2010, or expressed an interest in the project; was distributed to residents, property, and business owners within a 0.25-mile radius of the project site; and was posted in the *L.A. Watts Times* and *La Opinión* newspapers and on the County Second Supervisorial District Web site.[12] The County attracted informative and supportive public feedback and participation when they hosted a scoping meeting on March 24, 2010, to solicit input from the public on the elements of the project. The public review period closed on April 6, 2010. Eight comment letters were received in response to the NOP and Initial Study (Volume II, Appendix A), comprising six letters from agencies and two letters from individuals. The Draft EIR considered the environmental impact areas identified in the NOP. Responses to these comments were incorporated into the body of the Draft EIR.

The EIR was prepared to inform public agency decision makers and the general public about the project and its significant environmental effects, to suggest possible ways of minimizing those significant effects, and to describe a reasonable range of alternatives that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. The Draft EIR was completed and forwarded to the State Office of Planning and Research (OPR) on August 31, 2010, for a 45-day comment period, which the County extended by one additional day to end on October 15, 2010 (as noted in the Notice of Completion).

A Notice of Completion (NOC) was posted at both OPR and the Los Angeles County Clerk's Office on August 31, 2010. A Public Notice of Availability (NOA) of the Draft EIR appeared in the *L.A. Watts Times* and *La Opinión* newspapers; was mailed directly to 1,555 interested parties (consisting of but not limited to agencies, meeting attendees, and residents, property, and business owners within a 0.25 mile of the project site); and was posted at the County Chief Executive Office, the Martin Luther King, Jr. Medical Center Campus, the Willowbrook Library, and on the County Second Supervisorial District Web site.

Copies of the Draft EIR and NOA were mailed to 38 public agency representatives. Of which, at least 17 of the NOAs were transmitted to responsible agencies.

The Final EIR was prepared based on the Draft EIR, comments provided in response to circulation of the Draft EIR for public review, and clarifications and revisions resulting from public review of the Draft EIR. A total of nine letters of comment were received on the Draft EIR; eight letters were received from public agencies and one was from an individual. Upon completion of the evaluation, this Final EIR was prepared and provided to the County Board of Supervisors for certification of compliance with CEQA and for review and consideration as part of the decision-making process for the project.

[12] County of Los Angeles Second Supervisorial District. Web site. Available at: http://ridley-thomas.lacounty.gov/Pages/Issues/mlk_hospital.htm

I.G GENERAL FINDINGS

The County has evaluated all environmental impact areas recommended by CEQA and the State CEQA Guidelines during the environmental evaluation of the project.

Initial Study

The Initial Study (dated March 8, 2010) determined that the project would not result in significant impacts to four environmental impact areas: agriculture resources, biological resources, land use and planning, and mineral resources. The Initial Study was circulated for review with the NOP and is included as Appendix A to the EIR.

Environmental Impact Report

Tier I

The EIR determined that Tier I of the project is not expected to result in significant impacts to four environmental impact areas: population and housing, public services, recreation, and utilities and service systems.

Impacts related to aesthetics (light and glare), air quality (air quality standards, cumulative impacts, and sensitive receptors during construction only), cultural resources (paleontological resource and human remains), geology and soils (soil erosion or loss of top soil, geologic unit or unstable soil, and expansive soil), greenhouse gas emissions (operation), hazards and hazardous materials (accidental release, within 0.25 mile of an existing or proposed school, and Government Code Section 65962.5), hydrology and water quality (water quality standards, waste discharge, runoff water, and water quality during construction and limited operation), noise (mechanical noise during construction only), and transportation and traffic (circulation system and congestion during construction only) can be mitigated to below the level of significance.

Construction-related impacts to greenhouse gases (construction) and noise (construction) may remain significant following the implementation of mitigation measures. Incorporation of mitigation measures for each would reduce anticipated impacts to greenhouse gases and noise from construction; however, they would remain significant after implementation of mitigation measures.

Tier II

The EIR determined that Tier II of the project is not expected to result in significant impacts to three environmental impact areas: population and housing, public services, and recreation.

Impacts related to aesthetics (light and glare, shade and shadow, and visual character), cultural resources (paleontological resource and human remains), geology and soils (soil erosion or loss of top soil, geologic unit or unstable soil, and expansive soil), hazards and hazardous materials (accidental release, within 0.25 mile of an existing or proposed school, and Government Code Section 65962.5), hydrology and water quality (water quality standards, waste discharge, runoff water, and degrade water quality during construction and operation), noise (mechanical noise), transportation and traffic (circulation system and congestion during construction, operation, and cumulative impacts), and utilities and service systems (wastewater treatment requirements and solid waste compliance) can be mitigated to below the level of significance.

Impacts to air quality (air quality standards, cumulative impacts, sensitive receptors during construction, and limited operation), cultural resources (historical resource), greenhouse gas emissions (construction), and noise (construction and vibration) would remain significant following the implementation of mitigation measures.

Alternatives

The County explored alternatives to the project to assess their ability to meet most of the objectives of the project and reduce significant effects of the project. Five project alternatives were evaluated: Alternative 1, Reduced Project Size Alternative (900,000 square foot Tier II); Alternative 2, Re-opening the Existing MACC Alternative; Alternative 3, Public Transportation Focused Alternative; Alternative 4, 500-Beds (in Tier I) Alternative; and Alternative 5, No Tier II Alternative. In addition, the No Project Alternative, as required by CEQA, was analyzed. The No Project Alternative was determined to be the environmentally superior alternative. Following the No Project Alternative, the Reopening of the Existing MACC is the environmentally superior alternative.

In accordance with Section 21081.6 (a) (1) of CEQA, the County has prepared a mitigation monitoring program for those measures required to mitigate or avoid significant effects on the environment.

In accordance with Section 21081.6 (a) (2) of CEQA, the County has specified the location and custodian of the documents and other materials that constitute the record of decision used in the decision-making process for the project.

In accordance with Section 21082.1 (c) (1), the County, through its governing Board of Supervisors, has independently reviewed and analyzed the information contained in the reports and environmental documents required by CEQA; has circulated draft documents, which reflect its independent judgment; and finds that the Final EIR reflects the independent judgment of the County.

The County has prepared a Statement of Overriding Considerations for impacts to the two Tier I environmental impact areas that cannot be reduced to below the level of significance: greenhouse gas emissions and noise, and the four Tier II environmental impact areas that cannot be reduced to below the level of significance: air quality, cultural resources, greenhouse gas emissions, and noise.

This report constitutes the required findings and statement pursuant to Sections 15091 and 15093 of the State CEQA Guidelines.

SECTION II
POTENTIAL ENVIRONMENTAL EFFECTS THAT ARE LESS THAN SIGNIFICANT

The analysis undertaken in support of the Initial Study and Environmental Impact Report (EIR) for the Martin Luther King, Jr. Medical Center Redevelopment project (project) determined that there are four environmental issue areas related to the California Environmental Quality Act (CEQA) that are not expected to have significant impacts resulting from implementation of the project. Based on the results of the Initial Study completed, it was determined that the project (including both Tiers I and II) will not have significant impacts on four environmental issue areas: agriculture and forestry resources, biological resources, land use and planning, and mineral resources. Pursuant to Section 15128 of the State CEQA Guidelines, these issue areas were therefore not carried forward for detailed analysis in the EIR.

II.A AGRICULTURE AND FORESTRY RESOURCES

Significant Impact:

None

Finding:

Neither Tier I nor Tier II of the project is expected to result in significant impacts to agriculture and forest resources. Therefore, no mitigation is required.

Facts:

The above finding is made based on the analysis included in Section 2.0, *Environmental Checklist*, and Section 3.0, *Environmental Analysis*, of the Initial Study for the project. The California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP)[1] and the County of Los Angeles General Plan (County General Plan)[2] were reviewed in this evaluation. There are no Prime Farmlands, Unique Farmlands, or Farmlands of Statewide Importance present within or near the project site. No Farmlands will be converted to nonagricultural use, and the project will not conflict with zoning for agriculture or any Williamson Act contracts. The project will not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. The project will not result in the loss of forest land or conversion of forest land to non-forest use. The project will not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

[1] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. 2004. *Important Farmland in California, 2002*. Sacramento, CA.

[2] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Available at: http://ceres.ca.gov/docs/data/0700/791/HYPEROCR/hyperocr.html

II.B BIOLOGICAL RESOURCES

Significant Impact:

None

Finding:

Neither Tier I nor Tier II of the project is expected to result in significant impacts to biological resources. Therefore, no mitigation is required.

Facts:

The above finding is made based on the analysis included in Section 2.0 and Section 3.0 of the Initial Study for the project. The analysis considered a review of the County General Plan;[3] a query of the California Natural Diversity Database[4] for the U.S. Geological Survey (USGS) 7.5-minute series, South Gate, California, topographic quadrangle[5] where the project is located and all surrounding USGS 7.5-minute series topographic quadrangles, including Inglewood,[6] Long Beach,[7] Whittier,[8] Torrance,[9] Los Alamitos,[10] El Monte,[11] Hollywood,[12] and Los Angeles;[13] and a review of published and unpublished literature germane to the project. It was determined that implementation of the project will not result in significant impacts to any species identified as a candidate, sensitive, or special-status species; to riparian habitat or sensitive natural communities; to federally protected wetlands; to the movement of any native resident or migratory fish or wildlife species or corridors; or that impede the use of native wildlife nursery sites. The project will not conflict with any local policies or ordinances protecting biological resources, or with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan.

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[3] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA. Available at: http://ceres.ca.gov/docs/data/0700/791/HYPEROCR/hyperocr.html

[4] California Department of Fish and Game. 2009. *Rarefind 3: A Database Application for the Use of the California Department of Fish and Game Natural Diversity Data Base*. Sacramento, CA

[5] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[6] U.S. Geological Survey. [1964] Photo revised 1981. 7.5-Minute Series, Inglewood, California, Topographic Quadrangle. Reston, VA.

[7] U.S. Geological Survey. [1964] Photo revised 1981. 7.5-Minute Series, Long Beach, California, Topographic Quadrangle. Reston, VA.

[8] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, Whittier, California, Topographic Quadrangle. Reston, VA.

[9] U.S. Geological Survey. [1964] Photo revised 1981. 7.5-Minute Series, Torrance, California, Topographic Quadrangle. Reston, VA.

[10] U.S. Geological Survey. [1964] Photo revised 1981. 7.5-Minute Series, Los Alamitos, California, Topographic Quadrangle. Reston, VA.

[11] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, El Monte, California, Topographic Quadrangle. Reston, VA.

[12] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, Hollywood, California, Topographic Quadrangle. Reston, VA.

[13] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, Seal Beach, California, Topographic Quadrangle. Reston, VA.

II.C LAND USE AND PLANNING

Significant Impact:

None

Finding:

Neither Tier I nor Tier II of the project is expected to result in significant impacts to land use and planning. Therefore, no mitigation is required.

Facts:

The above finding is made based on the analysis included in Section 2.0 and Section 3.0 of the Initial Study for the project. The project will not divide an established community. Based on a review of the County General Plan,[14] adopted published maps and other adopted plans, and designations provided by the U.S. Fish and Wildlife and the California Department of Fish and Game in support of the project, it was determined that the project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. The project will not conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan.

II.D MINERAL RESOURCES

Significant Impact:

None

Finding:

Neither Tier I nor Tier II of the project is expected to result in significant impacts to mineral resources. Therefore, no mitigation is required.

Facts:

The above finding is made based on the analysis included in Section 2.0 and Section 3.0 of the Initial Study for the project. As a result of a review of the *Mines and Minerals Producers Active in California (1977–1998)* and Conservation element of the County General Plan, it was determined that there are no mineral resource areas of value to the region or to the residents of the state within the project area.[15,16] Further, the project will not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

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[14] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA. Available at: http://ceres.ca.gov/docs/data/0700/791/HYPEROCR/hyperocr.html

[15] California Geological Survey. Revised 1999. *Mines and Mineral Producers Active in California (1997–1998)*. Special Publication 103. Los Angeles, CA.

[16] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://ceres.ca.gov/docs/data/0700/791/HYPEROCR/hyperocr.html

TIER I

Based on the results of the analysis in Section 3.0, *Existing Conditions, Impacts, Mitigation, and Level of Significance After Mitigation*, of the EIR for the project, it was determined that Tier I of the project will not have significant impacts on four environmental issue areas related to CEQA: population and housing, public services, recreation, and utilities and service systems.

II.E POPULATION AND HOUSING

Significant Impact:

Less than significant

Finding:

The analysis undertaken in the EIR determined that Tier I of the project will have no significant impacts related to population and housing. Therefore, no mitigation is required.

Facts:

The above finding is made based on the analysis included in Section 3.09, *Population and Housing*, of the EIR for the project. Local data and forecasts for population and housing from the County General Plan, along with the state, regional sources, were evaluated.[17] In addition, the proximity of the project to existing and planned utility infrastructure was taken into consideration. The project will not induce substantial population growth, displace substantial numbers of existing housing, or displace substantial numbers of people. Tier I of the project does not entail a residential element, will not displace any existing residents, and will not necessitate the construction of replacement housing elsewhere. Tier I will not contribute to indirect growth as the labor force required to construct Tier I of the project will be filled either by employees who live in the surrounding area or by people who will commute from their existing places of residence.

II.F PUBLIC SERVICES

Significant Impact:

Less than significant

Finding:

The analysis undertaken in the EIR determined that Tier I of the project will have no significant impacts related to public services. Therefore, no mitigation is required.

Facts:

The above finding is made based on the analysis included in Section 3.10, *Public Services*, of the EIR for the project. The potential for impacts to public services has been analyzed in

[17] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA. Available at: http://ceres.ca.gov/docs/data/0700/791/HYPEROCR/hyperocr.html

accordance with the methodologies and information provided by the County General Plan[18] and the Web sites of the City of Los Angeles, City of Compton,[19,20] County of Los Angeles Fire Department,[21] and the County of Los Angeles Sheriff's Department.[22] The project area is adequately served by the existing public services and will not result in substantial adverse physical impacts associated with the provision or need of new or physically altered governmental facilities related to fire protection, police protection, schools, parks, or other public facilities.

II.G RECREATION

Significant Impact:

Less than significant

Finding:

The analysis undertaken in the EIR determined that Tier I of the project will have no significant impacts related to recreation. Therefore, no mitigation is required.

Facts:

The above finding is made based on the analysis included in Section 3.11, *Recreation*, of the EIR for the project. Recreation at the project site was evaluated with regard to state, regional, and local data and forecasts for recreation, and the County General Plan.[23] The project will not increase the use of existing neighborhood and regional parks or other recreational facilities, nor will it include recreational facilities or require the construction or expansion of recreational facilities. It was determined that the project area is adequately served by existing recreational facilities, and the open space areas and walkways provided on the campus will increase available recreational facilities and open space.

II.H UTILITIES AND SERVICES SYSTEMS

Significant Impact:

Less than significant

Finding:

The analysis undertaken in the EIR determined that Tier I of the project will have no significant impacts related to utilities and service systems. Therefore, no mitigation is required.

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[18] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[19] City of Los Angeles. 2010. Web site. Available at: http://www.ci.la.ca.us/

[20] City of Compton. 2010. Web site. Available at: http://www.comptoncity.org/index.php/Parks-and-Recreation/recreation-facilities.html

[21] County of Los Angeles Fire Department. 2008. Web site. Available at: http://www.fire.lacounty.gov/default.asp

[22] County of Los Angeles Sheriff's Department. 2008. Web site. Available at: http://www.lasd.org/

[23] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

Facts:

The above finding is made based on the analysis included in Section 3.13, *Utilities and Service Systems*, of the EIR for the project. The County General Plan, the County Integrated Waste Management Plan, the Water Supply Assessment prepared for the project, and other sources for information related to utilities and service systems were reviewed.[24,25,26] It was determined that Tier I of the project will not exceed wastewater treatment requirements, require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, or require or result in construction of storm water drainage facilities or expansion of existing facilities. Sufficient water supplies will be available to serve Tier I of the project, and adequate wastewater treatment and landfill capacity will be available to serve the projected demand of the project. In addition, as a County hospital, the project will be required to demonstrate that all solid waste will be disposed of properly at the permitted facilities designated for solid waste (including medical hazardous waste), and therefore, Tier I of the project will comply with federal, state, and local statues and regulations related to solid waste.

TIER II

Based on the results of the analysis included in Section 3.0 of the EIR for the project, it was determined that Tier II of the project will not have significant impacts on three environmental issue areas related to CEQA: population and housing, public services, and recreation.

II.I POPULATION AND HOUSING

Significant Impact:

None

Finding:

The analysis undertaken in this EIR determined that Tier II will not have significant impacts related to population and housing. Therefore, no mitigation is required.

Facts:

The above finding is made based on the analysis included in Section 3.09 of the EIR for the project. Local data and forecasts for population and housing from the County General Plan, along with the state, regional sources, were evaluated. In addition, the proximity of the project to existing and planned utility infrastructure was taken into consideration.[27] In addition, the proximity of the project to existing and planned utility infrastructure was

[24] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[25] County of Los Angeles Department of Public Works. 2001. *Los Angeles County Integrated Waste Management Plan, 2000 Annual Report on the Countywide Summary Plan and Countywide Siting Element*. Alhambra, CA.

[26] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by RMT, Inc., Los Angeles, CA.

[27] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA. Available at: http://ceres.ca.gov/docs/data/0700/791/HYPEROCR/hyperocr.html

reviewed for this analysis. The project will not induce substantial population growth, displace substantial numbers of existing housing, or displace substantial numbers of people. The direct growth from Tier II of the project's residential component falls within the projections of the Southern California Association of Governments (SCAG) for areas designated as Compass Blueprint 2% Strategy growth areas, and will therefore not result in a significant impact with regard to substantial or unplanned population growth. Further, Tier II of the project will not displace any existing residents or necessitate the construction of replacement housing elsewhere. It is anticipated that construction jobs for Tier II of the project will be filled by existing employees who live in the surrounding area or by people who will commute from their existing places of residence. Further, construction work will be specialized so that construction employees will remain on site only for the timeframe in which their specific skills are necessary to complete a particular phase of the construction process (i.e., site clearance, paving, painting, etc.). As such, the need for construction workers will not result in workers relocating to the project area, particularly for a temporary construction assignment of short duration.

II.J PUBLIC SERVICES

Significant Impact:

Less than significant

Finding:

The analysis undertaken in the EIR determined that Tier II will have no significant impacts related to public services. Therefore, no mitigation is required.

Facts:

The above finding is made based on the analysis included in Section 3.10, *Public Services,* of the EIR for the project. The potential for impacts to public services has been analyzed in accordance with the methodologies and information provided by the County General Plan[28] and the Web sites of the City of Los Angeles, City of Compton,[29,30] County of Los Angeles Fire Department,[31] and County of Los Angeles Sheriff's Department.[32] The project area is adequately served by the existing public services and will not result in substantial adverse physical impacts associated with the provision or need for new or physically altered governmental facilities related to fire protection, police protection, schools, parks, or other public facilities. In addition, Tier II development is consistent with the SCAG's anticipated growth projections described above and the shifts in public services that will be required in response to the anticipated growth in the community (even with the additional of the Tier II development) will continue to adequately serve the project area.

[28] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[29] City of Los Angeles. 2010. Web site. Available at: http://www.ci.la.ca.us/

[30] City of Compton. 2010. Web site. Available at: http://www.comptoncity.org/index.php/Parks-and-Recreation/recreation-facilities.html

[31] County of Los Angeles Fire Department. 2008. Web site. Available at: http://www.fire.lacounty.gov/default.asp

[32] County of Los Angeles Sheriff's Department. 2008. Web site. Available at: http://www.lasd.org/

II.K RECREATION

Significant Impact:

Less than significant

Finding:

The analysis undertaken in the EIR determined that Tier II of the project will have no significant impacts related to recreation. Therefore, no mitigation is required.

Facts:

The above finding is made based on the analysis included in Section 3.11, *Recreation*, of the EIR for the project. Recreation at the project site was evaluated with regard to state, regional, and local data and forecasts for recreation, and the County General Plan.[33] The project will not increase the use of existing neighborhood and regional parks or other recreational facilities, nor will it include recreational facilities or require the construction or expansion of recreational facilities. It was determined that the project area is adequately served by existing recreational facilities, and the open space areas and walkways provided on the campus will increase the recreational facilities and open space available.

[33] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

SECTION III
POTENTIAL ENVIRONMENTAL EFFECTS THAT CAN BE MITIGATED TO A LEVEL OF INSIGNIFICANCE

The analysis undertaken in support of the Environmental Impact Report (EIR) for the Martin Luther King, Jr. Medical Center Redevelopment project (project) determined that for Tier I, 7 of the 13 environmental impact areas expected to be subject to significant impacts as result of the project will be reduced to below the level of significance with the incorporation of the specified mitigation measures: aesthetics, air quality, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and transportation and traffic. For Tier II, 5 of the 13 environmental impact areas expected to be subject to significant impacts as result of the project will be reduced to below the level of significance with the incorporation of the specified mitigation measures: aesthetics, geology and soils, hydrology and water quality, transportation and traffic, and utilities and service systems. The specific impacts associated with the issue areas that were reduced to below the level of significance are discussed in this section.

III.A AESTHETICS

Tier I

Significant Impact:

Implementation of Tier I of the project is expected to result in significant impacts to aesthetics in relation to light and glare, as a result of three primary sources of light on the proposed project site: light emanating from building interiors that passes through windows; light from the headlights of parked, and traveling vehicles and light from exterior sources.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to aesthetics.

Facts:

The recommended mitigation measure Aesthetics-1 ensures that potential impacts related to security, building, or other sources of light and glare are reduced to below the level of significance less than significant.

Measure Aesthetics-1

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

Tier II

Significant impact:

Implementation of Tier II of the project is expected to result in significant impacts to aesthetics in relation to visual character, shade and shadow, and light and glare, as a result of three primary sources of light on the proposed project site: light emanating from building interiors that passes through windows; light from the headlights of parked, and traveling vehicles and light from exterior sources.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to aesthetics.

Facts:

Implementation of mitigation measures Aesthetics-1 and Aesthetics-4 are expected to prevent security lighting and building lighting from causing significant levels of light spillover or light trespass. Implementation of mitigation measure Aesthetics-4 is expected to prevent vehicle highlights from causing significant levels of light intrusion. Finally, implementation of mitigation measures Aesthetics-3 and Aesthetics-4 are expected to reduce impacts related to a new source of light and glare to below the level of significance.

Implementation of mitigation measures Aesthetics-2 and Aesthetics-3 are expected to prevent potential building shadows from Tier II from causing significant levels of shade to spill over onto adjacent land uses including residences. Therefore, implementation of mitigation measures Aesthetics-2 and Aesthetics-3 are expected to reduce impacts related to a new source of shadow to below the level of significance for the Tier II project components.

Implementation of mitigation measure Aesthetics-2 is expected to ensure consistency within the medical campus and with the surrounding area. As supported by project design guidelines listed in mitigation measure Aesthetics-1, the materials used to construct Tier II of the project will be consistent with existing visual quality conditions at the project site and within the surrounding area, and will reduce potential impacts to visual character to below the level of significance.

Measure Aesthetics-1

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

Measure Aesthetics-2

The County of Los Angeles shall review all plans for the Tier II development and ensure that all contractors conform with all design features as described in the intended to incorporate materials to ensure visual consistency and continuity at the project site and within the surrounding area.

Measure Aesthetics-3

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

Measure Aesthetics-4

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

III.B AIR QUALITY

Tier I

Significant Impact:

Implementation of Tier I of the project is expected to result in significant impacts to air quality related to air quality standards, cumulative impacts, and sensitive receptors during construction only due to construction related activities.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to air quality.

Facts:

Implementation of air quality mitigation measures Air-1 through Air-8 will reduce fugitive dust emissions associated with construction activities, which will cause daily $PM_{2.5}$ and PM_{10} emissions to remain at below the South Coast Air Quality Management District (SCAQMD) thresholds of significance

Implementation of mitigation measures Air-9 and Air-10 will ensure that criteria pollutant emissions associated with the use of construction equipment and the application of paints and coatings are reduced to the maximum extent feasible. However, volatile organic compounds (VOCs) and NO_x emissions during construction will still result in temporary significant and unavoidable impacts.

Implementation of mitigation measure Air-11 will ensure that criteria pollutant emissions associated with the use of construction equipment are reduced to the maximum extent feasible. As such, criteria pollutant emissions during construction will remain at below the level of significance and will therefore not be significant.

Mitigation measures Air-1 through Air-11 will also ensure that cumulative air quality impacts during construction remain at below the level of significance and that construction-related impacts to sensitive receptors are reduced to below the level of significance.

Measure Air-1

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

practicable and that the County of Los Angeles appoints a construction relations officer to act as a community liaison concerning on-site construction activity including addressing issues related to fugitive dust generation.

Measure Air-2

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

Measure Air-3

Discontinuing Tier I construction activities that occur on unpaved surfaces during windy conditions (when winds exceed 25 miles per hour as instantaneous gusts) shall be discontinued to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cease construction activities that occur on unpaved surfaces during periods when winds exceed 25 miles per hour as instantaneous gusts.

Measure Air-4

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

Measure Air-5

A wheel washing system shall be installed during Tier I, and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site. Washing of wheels leaving the construction site during construction of each element shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. The County of Los Angeles shall ensure that the plans and specifications for each element of the project

include the requirement for the construction contractor to clean adjacent streets of tracked dirt at the end of each workday or install on-site wheel-washing facilities.

Measure Air-6

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

Measure Air-7

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

Measure Air-8

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

Measure Air-9

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

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

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

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

Measure Air-10

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

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

Measure Air-11

The following measures shall be implemented, wherever feasible, to reduce operational air quality impacts:

- Improve traffic flow by signal synchronization;
- Ensure County-owned campus vehicles use clean fuels such as compressed natural gas and that shuttle buses for the campus are "clean" buses, such as 2010-compliant vehicles;
- Require all County of Los Angeles and County contractor vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications;
- Provide services that promote ridesharing and vanpools;

- Provide charging stations or preferred parking for alternative technology vehicles;
- Provide preferred parking for carpools and vanpools; and
- Reduce energy consumption by providing alternative energy sources on site and installing energy-efficient appliances.

Tier II

Significant Impact:

Implementation of Tier II of the project is expected to result in significant impacts to air quality related to air quality standards, cumulative impacts, sensitive receptors during construction, and limited operation.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate, reduce to below the level of significance, or avoid the significant effects on the environment related to air quality.

Facts:

Implementation of air quality mitigation measures Air-1 through Air-8 will reduce fugitive dust emissions associated with construction activities, which will cause daily $PM_{2.5}$ and PM_{10} emissions to remain at below the SCAQMD thresholds of significance.

Implementation of mitigation measures Air-9 and Air-10 will ensure that criteria pollutant emissions associated with the use of construction equipment and the application of paints and coatings are reduced to the maximum extent feasible. However, volatile organic compounds (VOCs) and NO_x emissions during construction will still result in temporary significant and unavoidable impacts.

Mitigation measure Air-11 would reduce mobile source emissions during operation, but criteria pollutant emissions from mobile sources during operation of Tier II will remain significant.

Mitigation measures Air-1 through Air-11 will also ensure that air quality impacts on sensitive receptors during construction are reduced to the maximum extent feasible. However, implementation of Tier II of the project will still have the potential to result in significant impacts to sensitive receptors related to emissions of NO_x, $PM_{2.5}$, and PM_{10}.

Mitigation measures Air-1 through Air-11 will also ensure that cumulative air quality impacts during construction are reduced to the maximum extent feasible. However, implementation of Tier II of the project will still be expected to result in cumulative construction-related impacts when considered with construction and operation of the related past, present, or reasonably foreseeable, probable future projects.

Measure Air-1

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

Measure Air-2

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

Measure Air-3

Construction activities that occur on unpaved surfaces during windy conditions (when winds exceed 25 miles per hour as instantaneous gusts) shall be discontinued to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cease construction activities that occur on unpaved surfaces during periods when winds exceed 25 miles per hour as instantaneous gusts.

Measure Air-4

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

Measure Air-5

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

Measure Air-6

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

Measure Air-7

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

Measure Air-8

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

requirement for the construction contractor to ensure heavy-equipment operations be suspended during first- and second-stage smog alerts.

Measure Air-9

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

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

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

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

Measure Air-10

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

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

Measure Air-11

The following measures shall be implemented, wherever feasible, to reduce operational air quality impacts:

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

III.C CULTURAL RESOURCES

Tier I

Significant Impact:

Implementation of Tier I of the project is expected to result in potentially significant impacts to cultural resources related to paleontological resources and human remains as a result of development of the project.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to cultural resources.

Facts:

Implementation of mitigation measure Cultural-1 will reduce any potential significant impacts to cultural resources related to an adverse change in the significance of a unique paleontological resource discovered under Tier I to below the level of significance.

Implementation of mitigation measure Cultural-2 will reduce any potential significant impacts to human remains discovered under Tier I to below the level of significance.

Paleontological Resources

Measure Cultural-1

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

- Paleontological Resources Sensitivity Training is required for all project personnel prior to the start of ground-disturbing activities. This brief (approximately 15 minute) field training reviews what fossils are, what fossils might potentially be found, and the appropriate procedures to follow if fossils are found.

- Prior to any ground-disturbing activities, the County of Los Angeles shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain unique paleontological resources.

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In

addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data.

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

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

Human Remains

Measure Cultural-2

Although the discovery of human remains is not anticipated during ground-disturbing activities for the project, a process has been delineated for addressing the unanticipated discovery of human remains:

- Unanticipated Discovery of Human Remains (Public Resources Code 5097). The Los Angeles County Coroner shall be notified within 24 hours of the discovery of human remains. Upon discovery of human remains, there shall be no further excavation or disturbance of the site or any of that area reasonably suspected to overlie adjacent human remains until the following conditions are met:

  - The Los Angeles County Coroner has determined that no investigation of the cause of death is required, and

  - Whenever the Native American Heritage Commission receives notification of a discovery of Native American human remains from the Los Angeles County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. If the remains are of Native American origin, the descendants from the deceased Native Americans shall complete their inspection and make recommendations or preferences in writing to the landowner or the person responsible for the excavation work, for treatment or disposition of, with

appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

Tier II

Significant Impact:

Implementation of Tier II of the project is expected to result in significant impacts to cultural resources related to paleontological resources, human remains, and historical resources.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to cultural resources.

Facts:

Implementation of mitigation measure Cultural-1 will reduce any potential significant impacts to cultural resources related to an adverse change in the significance of a unique paleontological resource discovered under Tier II to below the level of significance.

Implementation of mitigation measure Cultural-2 will reduce any potential significant impacts to human remains discovered under Tier II to below the level of significance.

Implementation of mitigation measure Cultural-3 will reduce Tier II impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, Multi-Service Ambulatory Care Center (MACC), Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium as a result of Tier II of the project to below the level of significance.

Implementation of mitigation measures Cultural-4 and Cultural-5 will reduce Tier II impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium as a result of Tier II of the project to the maximum extent feasible. However, the demolition of a historical resource still will remain a significant adverse impact.

<u>Paleontological Resources</u>

Measure Cultural-1

The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the project shall be reduced to below the level of significance by monitoring, salvage, and curation of unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located 15 or more feet below the ground surface that would have the potential to contact extant older Quaternary Alluvium. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are

encountered during ground-disturbing activities, the County of Los Angeles shall require and be responsible for salvage and recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology:

- Paleontological Resources Sensitivity Training is required for all project personnel prior to the start of ground-disturbing activities. This brief (approximately 15 minute) field training reviews what fossils are, what fossils might potentially be found, and the appropriate procedures to follow if fossils are found.

- Prior to any ground-disturbing activities, the County of Los Angeles shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain unique paleontological resources.

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data.

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

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

Human Remains

Measure Cultural-2

Although the discovery of human remains is not anticipated during ground-disturbing activities for the project, a process has been delineated for addressing the unanticipated discovery of human remains:

- Unanticipated Discovery of Human Remains (Public Resources Code 5097). The Los Angeles County Coroner shall be notified within 24 hours of the discovery of human remains. Upon discovery of human remains, there shall be no further excavation or disturbance of the site or any of that area reasonably suspected to overlie adjacent human remains until the following conditions are met:

  - The Los Angeles County Coroner has determined that no investigation of the cause of death is required, and

  - Whenever the Native American Heritage Commission receives notification of a discovery of Native American human remains from the Los Angeles County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. If the remains are of Native American origin, the descendants from the deceased Native Americans shall complete their inspection and make recommendations or preferences in writing to the landowner or the person responsible for the excavation work, for treatment or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

Historical Resources

Potentially significant adverse impacts to historical resources have been identified in relation to five historical resources as a result of implementation of the Tier II project: the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium. Three mitigation measures have been identified in association with Tier II to reduce impacts to the maximum extent practicable. In the event that the five historical resources are not removed or otherwise impacted through significant modifications or alterations to the character-defining features of these resources, this impact would be less than significant and would not require mitigation.

Measure Cultural-3

Tier II impacts to four significant historical resources (Multi-Service Ambulatory Care Center [MACC], Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium) and the integrity of the Martin Luther King, Jr. Medical Center Campus Historic District (a fifth historic resource) shall be reduced to below the level of significance through utilization of the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines of Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* for any alterations, including all site work, structural upgrades, architectural, and mechanical systems improvements and repairs. The work shall conform to the standards and guidelines for "rehabilitation." Conformance with the Secretary of the Interior's Standards shall be monitored by an architectural historian or historic architect who meets the Secretary of the Interior's Professional Qualification Standards. Completion of this mitigation measure shall be monitored and enforced by the County of Los Angeles.

Measure Cultural-4

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

Measure Cultural-5

Impacts resulting from the loss of integrity of the Martin Luther King, Jr. Medical Center Campus Historic District such that its significance is materially impaired shall be reduced to the maximum extent feasible through the development of a retrospective exhibit detailing the history of the Martin Luther King, Jr. Medical Center Campus Historic District, its significance, and its important details and features. The retrospective exhibit shall be in the form of a physical exhibit installed on the Martin Luther King, Jr. Medical Center Campus, which shall be located either within a building or on a freestanding kiosk or comparable structure or installation on the property. The exhibit should commemorate the historic appearance of the district and provide the public with sufficient information to understand its historic significance.

The exhibit shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The exhibit should be completed within a period of no more than two years from the date of completion of Tier II of the project.

III.D GEOLOGY AND SOILS

Tier I

Significant Impact:

Implementation of Tier I of the project is expected to result in significant impacts to geology and soils in relation to substantial soil erosion and loss of topsoil, being located on a geologic unit or soil that is unstable, or that would become unstable, and being located on expansive soil, creating substantial risks to life or property.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to geology and soils.

Facts:

Implementation of mitigation measures Geology-1 through Geology-3 described below will reduce impacts related to geology and soils to below the level of significance.

Measure Geology-1

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

Measure Geology-2

Due to seismic compliance standards established by the Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or as required, the construction contractor shall incorporate project design elements consistent with Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or required standards, and thus further reduce any potential for impacts resulting from unstable geologic units and soils. The County of Los Angeles shall

[1] California Stormwater Quality Association. 2003. *California Stormwater Best Management Practice Handbooks: Construction*. Menlo Park, CA. Available at: http://www.cabmphandbooks.com/Documents/Construction/Section_3.pdf

conform to measures described in the project geotechnical study(ies) to ensure compliance throughout the construction and development of the project.

Measure Geology-3

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

Tier II

Significant Impact:

Implementation of Tier II of the project is expected to result in significant impacts to geology and soils in relation to substantial soil erosion and loss of topsoil, being located on a geologic unit or soil that is unstable, or that would become unstable, and being located on expansive soil, creating substantial risks to life or property.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to geology and soils.

Facts:

Implementation of mitigation measure Geology-1 will reduce significant impacts of Tier II related to soil erosion or loss of topsoil to below the level of significance.

Implementation of mitigation measure Geology-2 will reduce significant impacts of Tier II related to the project being located on a geologic unit or soil that is unstable to below the level of significance.

Implementation of mitigation measure Geology-3 will reduce significant impacts of Tier II related to the project being located on expansive soil to below the level of significance.

Measure Geology-1

The construction contractor shall incorporate best management practices consistent with the guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction*.[2] As discussed in the Geotechnical Investigation that was prepared for the project site, earthwork at the project site should be performed in conformance with the Los Angeles County Building Code and other guidelines provided in the geotechnical study, and under the observation and testing of a geotechnical engineer, in order to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills.

[2] California Stormwater Quality Association. 2003. *California Stormwater Best Management Practice Handbooks: Construction*. Menlo Park, CA. Available at: http://www.cabmphandbooks.com/Documents/Construction/Section_3.pdf

Measure Geology-2

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

Measure Geology-3

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

III.E GREENHOUSE GAS EMISSIONS

Tier I

Significant Impact:

Implementation of Tier I of the project is expected to result in significant impacts to greenhouse gas emissions related to emissions during construction and operation.

Finding:

Changes or alterations (in the form of a mitigation measure) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to greenhouse gas emissions.

Facts:

Mitigation measure GHG-1 will reduce CO_2 emissions contributed by operation of Tier I of the project, thereby assisting compliance with the goals of Assembly Bill (AB) 32 to reduce CO_{2e} emissions to 1990 levels by the year 2020. Mitigation measure GHG-1 will ensure that indirect, direct, and cumulative greenhouse gas (GHG) emission impacts are reduced to the maximum extent feasible. After implementation of mitigation measure GHG-1, potential GHG emission impacts associated with operation of Tier I will remain at below the level of significance. However, construction of Tier I of the project may be expected to remain above the level of significance if the California Air Pollution Controls Officers Association (CAPCOA) suggested quantitative threshold of 900 tons of CO_{2e} per year is used.

Measure GHG-1

Prior to construction of the project, the final design plan and schemes for Tier I shall be reviewed to ensure that the County of Los Angeles conforms to its commitments pursuant to the California Climate Action Registry and the greenhouse gas emissions reduction targets established in Assembly Bill 32 are dependent on the incorporation of this mitigation measure, which is based on seven (7) of the sustainable design strategies or comparable measures recommended by the California Office of Attorney General to reduce carbon dioxide (CO_2) emissions per capita:

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

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

Tier II

Significant Impact:

Implementation of Tier II of the project is expected to result in significant impacts to GHG emissions related to emissions during construction and operation.

Finding:

Changes or alterations (in the form of a mitigation measure) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to greenhouse gas emissions.

Facts:

Mitigation measure GHG-1 will reduce CO_2 emissions contributed by operation of Tier II of the project, thereby assisting compliance with the goals of AB 32 to reduce CO_{2e} emissions to 1990 levels by the year 2020. Mitigation measure GHG-1 would ensure that indirect, direct, and cumulative GHG emission impacts would be reduced to the maximum extent feasible. However, potential GHG emission impacts associated with construction and operation of Tier II would remain as significant and unavoidable.

Measure GHG-1

Prior to construction of the project, the final design plan and schemes for Tier II shall be reviewed to ensure that the County of Los Angeles conforms to its commitments pursuant to the California Climate Action Registry and the greenhouse gas emissions reduction targets established in Assembly Bill 32 are dependent on the incorporation of this mitigation measure, which is based on seven (7) of the sustainable design strategies or comparable measures recommended by the California Office of Attorney General to reduce carbon dioxide (CO_2) emissions per capita:

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

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

III.F HAZARDS AND HAZARDOUS MATERIALS

Tier I

Significant Impact:

Implementation of Tier I of the project will be expected to result in significant impacts to hazards and hazardous materials in relation to the release of hazardous materials into the environment and hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste, to existing or schools located within one-quarter mile of the project site, and Government Code Section 65962.5 as a result of construction and operation related activities.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to hazards and hazardous materials.

Facts:

Implementation of mitigation measure Hazards-1 and Hazards-2 for Tier I will reduce significant impacts related to the exposure of hazards and hazardous materials to below the level of significance.

Implementation of mitigation measure Hazards-3 for Tier I will reduce significant impacts related to underground storage tanks (USTs) below the level of significance.

Implementation of mitigation measure Hazards-4 for Tier I will reduce significant impacts related to exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon–contaminated soils during routine transport and disposal for both the construction phase and operational phase of the project to below the level of significance.

Implementation of mitigation measure Hazards-5 for Tier I will reduce significant impacts related to hazards and hazardous materials below the level of significance.

Measure Hazards-1

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

agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Measure Hazards-2

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

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

Measure Hazards-3

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

Measure Hazards-4

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

Measure Hazards-5

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

Tier II

Significant Impact:

Implementation of Tier II of the project is expected to result in significant impacts to hazards and hazardous materials in relation to the release of hazardous materials into the environment and hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste, to existing or schools located within one-quarter mile of the project site, and Government Code Section 65962.5.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to hazards and hazardous materials.

Facts:

Implementation of mitigation measure Hazards-1 and Hazards-2 for Tier II will reduce significant impacts related to the exposure of hazards and hazardous materials to below the level of significance.

Implementation of mitigation measure Hazards-3 for Tier II will reduce significant impacts related to USTs below the level of significance.

Implementation of mitigation measure Hazards-4 for Tier II will reduce significant impacts related to exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon–contaminated soils during routine transport and disposal for both the construction phase and operational phase of the project to below the level of significance.

Implementation of mitigation measure Hazards-5 for Tier II will reduce significant impacts related to hazards and hazardous materials below the level of significance.

Measure Hazards-1

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

Measure Hazards-2

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

To reduce impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a

manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction). These agencies shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Measure Hazards-3

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

Soil screening samples will be analyzed for chemicals of potential concern. If volatile organic compounds are among the chemicals of potential concern, the Soil Management Plan will include protocols for conducting a soil vapor sampling program to investigate the potential for soil vapor intrusion in the area of concern. In the event that significant levels of soil or soil vapor contamination are identified, the County of Los Angeles Department of Public Works shall be notified and the area of concern shall be remediated to a level adequate to meet or exceed County of Los Angeles guidelines and the specifications of the Department of Toxic Substances Control and any other relevant standards.

Measure Hazards-4

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

Measure Hazards-5

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

III.G HYDROLOGY AND WATER QUALITY

Tier I

Significant Impact:

Implementation of Tier I of the project is expected to result in significant impacts to hydrology and water quality related to water quality standards, waste discharge, runoff water, and degrade water quality as a result of construction and limited operation related activities.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to hydrology and water quality.

Facts:

Implementation of mitigation measures Hydrology-1 through Hydrology-3, in addition to Hazards-1, will reduce significant hydrology and water quality impacts related to construction-related water quality to below the level of significance.

Measure Hydrology-1

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

- Scheduling excavation, grading, and paving activities for dry weather periods.
- Controlling the amount of runoff crossing the construction site by means of berms and drainage ditches to divert water flow around the site.
- Identifying potential pollution sources from materials and wastes that will be used, stored, or disposed of on the site.

- Informing contractors and subcontractors about the clean storm water requirements and enforce their responsibilities in pollution prevention through a contractual agreement
- Sweeping the streets surrounding the project site daily and trash removal throughout the construction of the project to avoid degradation of water quality.

Measure Hydrology-2

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

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

Measure Hydrology-3

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

Measure Hazards-1

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

Tier II

Significant Impact:

Implementation of Tier II of the project is expected to result in significant impacts to hydrology and water quality related to water quality standards, waste discharge, runoff water, and degrade water quality as a result of construction and limited operation related activities.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to hydrology and water quality.

Facts:

Implementation of mitigation measures Hydrology-1 through Hydrology-4, in addition to Hazards-1, will reduce significant hydrology and water quality impacts related to construction- and operation-related water quality to below the level of significance.

Measure Hydrology-1

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

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

Measure Hydrology-2

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

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

Measure Hydrology-3

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

Measure Hydrology-4

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

Measure Hazards-1

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

III.H NOISE

Tier I

Significant Impact:

Implementation of Tier I of the project is expected to result in significant impacts to noise related to groundbourne temporary ambient noise increase during construction, vibration, and mechanical noise during construction.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate, reduce, or avoid the significant effects on the environment related to noise.

Facts:

The distance from the project site at which impacts to affected residential structures will be below the level of significance is 80 feet. Structures located further than 80 feet away from the site are likely to not be impacted by construction related activities that are associated with the development of the project. The nearest residential land use is approximately 50 feet south of the project. Implementation of mitigation measures Noise-1 and Noise-2 will reduce construction noise at residential properties to the east and west of the campus to below the level of significance; however, construction noise levels will exceed the 75 dBA permissible level at residences south of the project site that are within 80 feet of the project property. Therefore, noise impacts from construction, while temporary, will remain significant and unavoidable.

Implementation of mitigation measure Noise-3 will reduce significant impacts related to potential building damage from vibration during construction to below the level of significance both on and off-site. However, vibration levels will still be perceptible at sensitive receptors such as homes and school located adjacent to the site; therefore, vibration levels during construction of the project will result in a significant and unavoidable impact.

Implementation of mitigation measure Noise-4 will reduce significant impacts related to mechanical noise to below the level of significance.

Measure Noise-1

The County of Los Angeles shall require that the plans and specifications require that construction equipment be equipped with state-of-the-art noise-muffling devices. Barriers or curtains shall be required to be installed close to equipment to shield the equipment from the receptor. Barriers or curtains utilized at the project site shall be required to reduce A-weighted construction noise levels at nearby sensitive receptors by a minimum of 10 dB. The height and length of the barriers or curtains shall be determined based on location of construction activity and receptor.

Because of the close proximity of the source and receptors, the noise impact would be dependent on the location of the noise sources. Prior to the start of demolition and construction, the contractor shall develop a noise control plan based on the actual equipment that will be used during demolition and construction, and the location of various demolition and construction activities. If the actual equipment noise levels are not available, equipment noises shall be measured in the field. The noise control plan shall predict the noise levels with actual equipment and with barriers or curtains in place. In addition, the plan shall take into account the demolition and equipment mix that would be operated at the same time. Equipment mix and/or the number of equipment operating shall be considered in reducing the noise levels.

Measure Noise-2

Prior to the completion of final plans and specifications, the County of Los Angeles shall ensure that the plans and specifications include a requirement that all demolition and construction equipment be properly maintained. All vehicles and compressors shall utilize exhaust mufflers. Engine enclosure covers as designed by the manufacturer shall be in place

at all times. The County of Los Angeles shall monitor the use of heavy equipment during all demolition and construction activities to ensure conformance with the requirements of properly maintained heavy equipment.

Measure Noise-3

The distance at which impact pile driving would not exceed a peak particle velocity of 0.2 inch per second at a residence would be 55 feet. Therefore, the County of Los Angeles shall require that impact pile driving not be utilized within 55 feet of a residential structure. Should pile driving be necessary within 55 feet of a residence, sonic pile driving shall be utilized.

Measure Noise-4

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

Tier II

Significant Impact:

Implementation of Tier II of the project is expected to result in significant impacts to noise related to groundbourne temporary ambient noise increase during construction, vibration, and mechanical noise during construction.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to noise.

Facts:

The distance from the project site at which impacts to affected residential structures will be below the level of significance is 80 feet. The nearest residential land use is approximately 50 feet south of the project. Implementation of mitigation measures Noise-1 and Noise-2 will reduce construction noise at residential properties to the east and west of the campus to below the level of significance; however, construction noise levels will exceed the 75 dBA permissible level at residences south of the project site that are within 80 feet of the project property. Therefore, noise impacts from construction, while temporary, will remain significant and unavoidable.

Implementation of mitigation measure Noise-3 will reduce significant impacts related to potential building damage from vibration during construction to below the level of

significance. However, vibration levels will still be perceptible at sensitive receptors; therefore, vibration levels during construction of the project will result in a significant and unavoidable impact.

Implementation of mitigation measure Noise-4 will reduce significant impacts related to mechanical noise to below the level of significance.

Measure Noise-1

The County of Los Angeles shall require that the plans and specifications require that construction equipment be equipped with state-of-the-art noise-muffling devices. Barriers or curtains shall be required to be installed close to equipment to shield the equipment from the receptor. Barriers or curtains utilized at the project site shall be required to reduce A-weighted construction noise levels at nearby sensitive receptors by a minimum of 10 dB or to the maximum extent possible. The height and length of the barriers or curtains shall be determined based on the location of the construction activity and receptor.

Because of the close proximity of the source and receptors, the noise impact would be dependent on the location of the noise sources. Prior to the start of demolition and construction, the contractor shall develop a noise control plan based on the actual equipment that will be used during demolition and construction, and the location of various demolition and construction activities. If the actual equipment noise levels are not available, equipment noises shall be measured in the field. The noise control plan shall predict the noise levels with actual equipment and with barriers or curtains in place. In addition, the plan shall take into account the demolition and equipment mix that would be operated at the same time. Equipment mix and/or the number of equipment operating shall be considered in reducing the noise levels.

Measure Noise-2

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

Measure Noise-3

The distance at which impact pile driving would not exceed a PPV 0.2 inch per second at a residence would be 55 feet. Therefore, the County of Los Angeles shall require that impact pile driving will not be utilized within 55 feet of a residential structure. Should pile driving be necessary within 55 feet of a residence, sonic pile driving will be utilized.

Measure Noise-4

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

III.I TRANSPORTATION AND TRAFFIC

Tier I

Significant Impact:

Implementation of Tier I of the project will result in significant transportation and traffic impacts related to circulation system and congestion during construction.

Finding:

Changes or alterations (in the form of a mitigation measure) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to transportation and traffic.

Facts:

Implementation of the mitigation measures Traffic-1 will reduce impacts generated during the construction of Tier I to less than significant.

Measure Traffic-1

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

- Timing of deliveries of heavy equipment and building materials;
- Directing construction traffic with a flag person;
- Placing temporary signing, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic;
- Identifying if improvements to the intersection of 120th Street, Wilmington Avenue, or Compton Avenue are necessary to accommodate the turning radii needed by large trucks accessing site;
- Identifying multiple alternate ingress/egress access point for the circulation of traffic and emergency response vehicles;

- Determining the need for construction work hours and arrival/departure times outside peak traffic periods;
- Ensuring access for emergency vehicles to the project site;
- Temporary closure of travel lanes or disruptions to street segments and intersections during materials delivery, transmission line stringing activities, or any other utility connections;
- Maintaining access to adjacent property;
- Specifying both construction-related vehicle travel and oversize load haul routes, minimizing construction traffic during the AM and PM peak hour, distributing construction traffic flow across alternative routes to access the project site, and avoiding residential neighborhoods to the maximum extent feasible; and
- Identifying vehicle safety procedures for entering and exiting site access roads.

Tier II

Significant Impact:

Implementation of Tier II of the project will result in significant transportation and traffic impacts related to circulation system and congestion during construction, operation, and cumulatively.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to transportation and traffic.

Facts:

Implementation of the mitigation measures Traffic-1 through Traffic-4 will reduce construction-related Tier II and operational Tier II project impacts and cumulative project impacts to below the level of significance.

Measure Traffic-1

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

- Timing of deliveries of heavy equipment and building materials;
- Directing construction traffic with a flag person;
- Placing temporary signing, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic;

- Identifying if improvements to the intersection of 120th Street, Wilmington Avenue, or Compton Avenue are necessary to accommodate the turning radii needed by large trucks accessing site;
- Identifying multiple alternate ingress/egress access point for the circulation of traffic and emergency response vehicles;
- Determining the need for construction work hours and arrival/departure times outside peak traffic periods;
- Ensuring access for emergency vehicles to the project site;
- Temporary closure of travel lanes or disruptions to street segments and intersections during materials delivery, transmission line stringing activities, or any other utility connections;
- Maintaining access to adjacent property;
- Specification of both construction-related vehicle travel and oversize load haul routes, the minimization of construction traffic during the AM and PM peak hour, distributing construction traffic flow across alternative routes to access the project site, and avoiding residential neighborhoods to the maximum extent feasible; and
- Identification of vehicle safety procedures for entering and exiting site access roads.

Measure Traffic-2

In order to address the Tier II project impacts, the County of Los Angeles shall complete the following improvements:

- Compton Avenue / Imperial Highway, County of Los Angeles / City of Los Angeles: Re-stripe westbound approach to provide a separate right-turn lane.

- I-105 / Imperial Highway: Provide a third northbound, left-turn lane by widening off-ramp by 10 feet for approximately 150 to 200 feet.

- Wilmington Avenue / El Segundo Boulevard: Re-stripe eastbound and westbound approaches to have separate right-turn lanes. Allow buses to go through the intersection from the right-turn lanes.

- Central Avenue / 120th Street: Re-stripe northbound approach to provide a separate right-turn lane. Also, widen the east leg by 3 feet on each curbside (i.e., reduce sidewalk along 120th Street east of Central Avenue by 3 feet for approximately 120 feet and re-stripe westbound 120th Street approach to provide a left-turn, two through lanes, and a separate right-turn lane.

- Wilmington Avenue / I-105 Eastbound Ramps, County of Los Angeles / California Department of Transportation: Provide an additional eastbound lane by widening (reducing the raised median on the ramp) the off-ramp. The eastbound approach shall have a left-turn lane, shared left-right turn lane, and a separate right-turn lane. The sidewalks on both sides of Wilmington Avenue (as noted above) shall be reduced by 2 feet and the Wilmington Avenue roadway shall be widened by 2 feet on both sides (a

total of 4 feet) from the south leg of this intersection. Provide an additional northbound left-turn lane by widening (reducing the medians). The northbound approach shall have dual left-turn lanes and three through lanes.

- Wilmington Avenue / 118th Street, County of Los Angeles: Widen Wilmington Avenue roadway by 2 feet on both sides and re-stripe to provide two through lanes, a shared through right-turn lane and dual left-turn lanes along the southbound approach. Re-stripe the westbound approach to provide a separate right-turn lane and a shared left-through lane. Northbound approach shall have the same lane geometry as existing conditions. Under cumulative conditions, widen 118th Street roadway by 4 feet and re-stripe to provide a separate right-turn lane and shared left-through lane along the eastbound approach.

- Wilmington Avenue / 120th Street–119th Street, County of Los Angeles: Widen Wilmington Avenue roadway by 2 feet on both sides and restripe the southbound approach to provide a separate right-turn lane, three through lanes, and a left-turn lane.

  Re-stripe northbound approach to provide a shared through-right turn lane, two through lanes, and a left-turn lane. Remove median adjacent to northbound approach to facilitate three southbound receiving lanes. Restrict parking along Wilmington Avenue roadway during morning and evening peak periods along the eastside of Wilmington between 120th Street and Martin Luther King, Jr. Hospital Driveway entrance.

  Widen 120th Street west of Wilmington Avenue for 250 feet, on the south side by 2 feet, and re-stripe the eastbound approach to provide a separate right-turn lane, dual left-turn lanes, and a through lane. The westbound approach of 119th Street would have the same lane geometry as existing conditions.

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

  Remove the median within the hospital entrance and re-stripe the driveway to provide dual left-turn lanes, a through lane, and a separate right-turn lane along the eastbound approach. Re-stripe to provide one receiving lane.

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

Measure Traffic-3

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

- Avalon Boulevard / El Segundo Boulevard, County of Los Angeles: Widen northbound approach by 2 feet and re-stripe the approach to provide a left turn lane, two through lanes, and a separate right-turn lane (10 feet, 10 feet, 10 feet, 12 feet). The approach could be widened by narrowing the 5-foot-wide median to a 3-foot-wide median, or by reducing the 12-foot-wide sidewalk to a 10-foot-wide sidewalk. This widening would need to occur all the way to an alley located approximately 100 feet south of the intersection. The bus stop at this approach would continue to be located at the same location; however, buses would be allowed to go straight through the intersection.

- Alameda Street / El Segundo Boulevard, County of Los Angeles / Compton: Re-stripe northbound/southbound approaches and provide a southbound right-turn lane. The lanes along the north leg shall be re-striped to provide 13-foot and 11-foot receiving lanes; 10-foot, 11-foot, 10-foot, and 12-foot approach lanes for southbound left-turn lane, southbound through lanes, and southbound right-turn lanes, respectively. The lanes along the south leg would have a 13-foot shared right through-way, 11-foot through lane, 10-foot left-turn lane, 12-foot receiving lane, and a 20-foot receiving lane. Remove two on-street parking spaces along the southbound approach during peak hours.

- Alameda Street / 103rd Street, County of Los Angeles / Lynwood: Re-stripe eastbound approach to provide a 10-foot, left-turn lane and a 12-foot, left-right shared lane. The receiving lane would be re-striped for 18.5 feet.

- Central Avenue / Rosecrans Avenue, County of Los Angeles / Compton: Re-stripe westbound approach to provide a separate right-turn lane. Allow buses to go through the intersection from the right-turn lane.

- Central Avenue / El Segundo Boulevard, County of Los Angeles / Compton: Re-stripe southbound approach to provide a separate right-turn lane. Widen northbound approach by reducing median by 1 foot to 2 foot. Provide re-striping to show a separate northbound right-turn lane. Allow buses to go through the intersection from the right-turn lane.

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

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

Measure Traffic-4

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

III.J UTILITIES AND SERVICE SYSTEMS

Tier I

It was determined that Tier I of the project is not expected to result in significant impacts to utilities and services systems and no mitigation was required for this issue area.

Tier II

Significant Impact:

Implementation of Tier II of the project is expected to result in significant impacts to utilities and services systems related to wastewater treatment requirements and solid waste compliance.

Finding:

Changes or alterations (in the form of mitigation measures) have been required in, or incorporated into, the project, that mitigate or avoid the significant effects on the environment related to utilities and service systems.

Facts:

Implementation of mitigation measures Utilities-1 and Utilities-2 will reduce impacts to utilities and service systems related to wastewater treatment and solid waste to below the level of significance.

Measure Utilities-1

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

Measure Utilities-2

The County of Los Angeles shall review the plans and specifications for the project and the parking facilities to ensure that adequate service areas are provided for trash and recycling receptacles for compliance with applicable federal, state, and local statutes related to solid waste, and to reduce direct and cumulative impacts from project operation and maintenance to below the level of significance. Prior to advertising for construction bids for

the new building, the County of Los Angeles shall ensure that the plans and specifications designating locations for trash receptacles and recycling receptacles are in conformance with the California Solid Waste Reuse and Recycling Access Act of 1991. Wherever trash receptacles are provided throughout the project site, a recycling receptacle for plastic, aluminum, and metal shall also be provided. Signs encouraging patrons to recycle shall be posted near each recycling receptacle.

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

SECTION IV
SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS THAT CANNOT BE MITIGATED TO A LEVEL OF INSIGNIFICANCE

The County of Los Angeles (County) has determined that although the mitigation measures for Tier I of the project will substantially reduce the level of impacts to greenhouse gas emissions and noise resulting from the project, these impacts will remain significant, unavoidable, and adverse. The County has also determined that, although the mitigation measures for Tier II of the project will substantially reduce the level of impacts to air quality, cultural resources, greenhouse gas emissions, and noise resulting from the project, these impacts will remain significant, unavoidable, and adverse impacts. Consequently, in accordance with Section 15093 of the State California Environmental Quality Act (CEQA) Guidelines, a Statement of Overriding Considerations has been prepared (see Section IX of this document) to substantiate County's decision to accept these unavoidable adverse environmental effects on the grounds that they are outweighed by the benefits afforded by the project.

IV.A TIER I

GREENHOUSE GAS EMISSIONS

Significant Impact:

Implementation of Tier I of the project will potentially result in significant, unavoidable adverse impacts to greenhouse gas (GHG) emissions related to emissions during construction. Implementation of mitigation measures will reduce operational impacts to below the level of significance.

Finding:

A Statement of Overriding Considerations has been prepared (see Section IX of this document) to address the GHG emission impacts associated with carbon dioxide (CO_2) emissions that will be contributed by construction of Tier I of the project. Implementation of mitigation measure Greenhouse Gas-1 will reduce indirect impacts and the recommended project's share of cumulative GHG emission impacts to the maximum extent feasible. After implementation of mitigation measure Greenhouse Gas-1, potential GHG emission impacts associated with operation of Tier I will remain below the level of significance. However, cconstruction of Tier I of the project will potentially remain above the level of significance if the California Air Pollution Control Officers Association's suggested quantitative threshold of 900 tons of carbon dioxide equivalent (CO_{2e}) per year is compared to the project.

Mitigation of significant impacts to GHG emissions is normally achieved pursuant to the California Climate Action Registry and the GHG emission reduction targets established by Assembly Bill 32. The GHG emission reduction targets depend on the incorporation of this mitigation measure and are based on seven sustainable design strategies or comparable measures recommended by the California Office of Attorney General to reduce CO_2 emissions per capita as discussed in detail in Section 3.5, Greenhouse Gas Emissions, of the EIR document.

Implementation of mitigation measure Greenhouse Gas-1, as well as mitigation measure Air-11, will reduce to the maximum extent feasible the potentially significant direct impacts,

indirect impacts, and the project's contribution to cumulative impacts to GHG emissions related to construction of Tier I of the project. However, construction-related GHG emissions of the project will remain significant and adverse.

The EIR considered the No Project Alternative and the following five action alternatives:

- Alternative 1: Reduced Project Size Alternative (900,000 square foot Tier II)
- Alternative 2: Re-opening the Existing MACC Alternative
- Alternative 3: Public Transportation Focused Alternative
- Alternative 4: 500 beds (in Tier I) Alternative
- Alternative 5: No Tier II Alternative

Section 4.0, *Alternatives to the Proposed Project*, of the EIR evaluates the effectiveness of each of the alternatives to achieve the basic objectives of the project described in Section 2.0, *Project Description*, of the EIR. The project will meet all of the basic objectives set forth by the County. Although the No Project Alternative is the environmentally superior alternative and has been analyzed as required pursuant to CEQA, it is not capable of meeting most of the basic objectives of the project. Following the No Project Alternative, the No Tier II Alternative is the environmentally superior alternative.

Facts:

The County recognizes that a project of this magnitude will potentially generate environmental impacts related to GHG emissions. In Section 3.5, *Greenhouse Gas Emissions*, of the EIR, the County has identified one mitigation measure that will address the impact to GHG emissions resulting from the construction of the project: Greenhouse Gas-1.

Measure Greenhouse Gas-1

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

- Design buildings to be energy efficient; site buildings shall take advantage of shade, prevailing winds, landscaping, and sun screens to reduce energy use

- Install efficient lighting and lighting control systems; use daylight as an integral part of lighting systems in buildings

- Create water-efficient landscapes

- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment (retaining storm water runoff on site can drastically reduce the need for energy-intensive imported water at the site)

- Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods

- Incorporate provisions for future public transit into the project design

- Preserve and create open space and parks; preserve existing trees and plant replacement trees at a set ratio

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

NOISE

Significant Impact:

Implementation of Tier I of the project will potentially result in significant impacts to noise related to a temporary increase in groundbourne ambient noise during construction. Groundbourne vibration and mechanical noise during construction will be reduced to below the level of significance through mitigation.

Finding:

A Statement of Overriding Considerations has been prepared (see Section IX of this document) to address the noise impacts that would occur during the construction of the project.

Residences located approximately 80 feet (or further) away from the project site would likely experience impacts associated with construction-related noise and vibration that would be below the level of significance. The nearest residential land use is approximately 50 feet. This residence is located south of the project property. Implementation of mitigation measures Noise-1 and Noise-2 will reduce construction noise at residential properties to the east and west of the campus to below the level of significance; however, construction noise levels will potentially exceed the permissible level of 75 A-weighted decibels (dBA) at residences south of the project site that are within 80 feet of the project property. Therefore, noise impacts from construction, while temporary, will remain significant and unavoidable.

Implementation of mitigation measure Noise-3 will reduce significant impacts related to potential vibration-related building damage during construction to below the level of significance. However, vibration levels will still be perceptible at sensitive receptors; therefore, noise impacts from vibration levels during construction of the project will remain significant and unavoidable.

Implementation of mitigation measure Noise-4 will reduce significant impacts related to mechanical noise to below the level of significance.

The EIR considered the No Project Alternative and the following five action alternatives:

- Alternative 1: Reduced Project Size Alternative (900,000 square foot Tier II)
- Alternative 2: Re-opening the Existing MACC Alternative
- Alternative 3: Public Transportation Focused Alternative

- Alternative 4: 500 beds (in Tier I) Alternative
- Alternative 5: No Tier II Alternative

Section 4.0 of the EIR evaluates the effectiveness of each of the alternatives to achieve the basic objectives of the project described in Section 2.0 of the EIR. The project will meet all of the basic objectives of the County. Although the No Project Alternative is the environmentally superior alternative and has been analyzed as required by CEQA, it is not capable of meeting most of the basic objectives of the project. Following the No Project Alternative, the No Tier II Alternative is the environmentally superior alternative as it would result in the least amount of potentially significant environmental impacts. However, like the No Project Alternative, the No Tier II Alternative is not capable of meeting most of the basic objectives of the project that are associated with Tier II of the project.

Facts:

The County recognizes that a project of this magnitude will potentially generate environmental impacts to noise during the construction phase. In Section 3.8, *Noise,* of the EIR, the County has identified three mitigation measures that will reduce the potential construction-related noise impacts of the project: Noise-1, Noise-2, and Noise-3. However, these impacts will remain significant and unavoidable even after implementation of mitigation.

Implementation of measure Noise-1 will reduce impacts related to noise to below the level of significance.

Measure Noise-1

The County of Los Angeles shall require that the plans and specifications require that construction equipment be equipped with state-of-the-art noise-muffling devices. Barriers or curtains shall be required to be installed close to equipment to shield the equipment from the receptor. Barriers or curtains utilized at the project site shall be required to reduce A-weighted construction noise levels at nearby sensitive receptors by a minimum of 10 decibels. The height and length of the barriers or curtains shall be determined based on location of construction activity and receptor.

Because of the close proximity of the source and receptors, the noise impact will depend on the location of the noise sources. Prior to the start of demolition and construction, the contractor shall develop a noise control plan based on the actual equipment that will be used during demolition and construction, and the location of various demolition and construction activities. If the actual equipment noise levels are not available, equipment noises shall be measured in the field. The noise control plan shall predict the noise levels with actual equipment and with barriers or curtains in place. In addition, the plan shall take into account the demolition and equipment mix that will be operated at the same time. Equipment mix and/or the number of equipment operating shall be considered in reducing the noise levels.

Measure Noise-2

Prior to the completion of final plans and specifications, the County of Los Angeles shall ensure that the plans and specifications include a requirement that all demolition and construction equipment be properly maintained. All vehicles and compressors shall utilize exhaust mufflers. Engine enclosure covers as designed by the manufacturer shall be in place at all times. The

County of Los Angeles shall monitor the use of heavy equipment during all demolition and construction activities to ensure conformance with the requirements of properly maintained heavy equipment.

Measure Noise-3

The distance at which impact pile driving would not exceed a peak particle velocity of 0.2 inch per second at a residence is 55 feet. Therefore, the County of Los Angeles shall require that impact pile driving not be utilized within 55 feet of a residential structure. Should pile driving be necessary within 55 feet of a residence, sonic pile driving shall be utilized.

Measure Noise-4

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

IV.B TIER II

AIR QUALITY

Significant Impact:

Implementation of Tier II of the project will result in significant impacts to air quality related to air quality standards, cumulative impacts, and sensitive receptors during construction and limited operation (such as area sources from natural gas combustion, central plant, landscape maintenance equipment and mobile sources).

Finding:

A Statement of Overriding Considerations has been prepared (see Section IX of this document) to address the air quality impacts associated with the substantial adverse change in the significance of air quality standards, cumulative impacts, and sensitive receptors that will potentially occur during the construction and limited operation of the project.

Implementation of air quality mitigation measures Air-1 through Air-8 will reduce fugitive dust emissions associated with construction activities, which would cause daily emissions of particulate matter ($PM_{2.5}$ and PM_{10}) to remain below the South Coast Air Quality Management District threshold of significance.

Implementation of mitigation measures Air-9 and Air-10 will reduce, to the maximum extent feasible, criteria pollutants emissions associated with the use of construction equipment and the application of paints and coatings. However, emissions of volatile organic compounds and nitrogen oxides (NO_x) during construction will remain as temporary significant and unavoidable impacts.

Mitigation measures Air-1 through Air-11 will also ensure that air quality impacts to sensitive receptors during construction will be reduced to the maximum extent feasible. However, implementation of Tier II of the project will still potentially result in significant impacts to sensitive receptors related to emissions of NO_x, $PM_{2.5}$, and PM_{10}.

Mitigation measures Air-1 through Air-11 will also ensure that the project's contribution to cumulative air quality impacts during construction will be reduced to the maximum extent feasible. However, implementation of Tier II of the project will still potentially result in cumulative construction-related impacts when considered with construction and operation of the related past, present, or reasonably foreseeable, probable future projects.

Mitigation measure Air-11 would ensure that criteria pollutant emissions associated with operation of the proposed project are reduced to the maximum extent feasible; however, criteria pollutant emissions from mobile sources during operation of Tier II would remain significant.

The EIR considered the No Project Alternative and the following five action alternatives:

- Alternative 1: Reduced Project Size Alternative (900,000 square foot Tier II)
- Alternative 2: Re-opening the Existing MACC Alternative
- Alternative 3: Public Transportation Focused Alternative
- Alternative 4: 500 beds (in Tier I) Alternative
- Alternative 5: No Tier II Alternative

Section 4.0 of the EIR evaluates the effectiveness of each of the alternatives to achieve the basic objectives of the project described in Section 2.0 of the EIR. The project will meet all of the basic objectives of the County. Although the No Project Alternative is the environmentally superior alternative and has been analyzed as required by CEQA, it is not capable of meeting most of the basic objectives of the project. Following the No Project Alternative, the No Tier II Alternative is the environmentally superior alternative as it would result in the least amount of potentially significant environmental impacts. However, like the No Project Alternative, the No Tier II Alternative is not capable of meeting most of the basic objectives of the project that are associated with Tier II of the project.

Facts:

The County recognizes that a project of this magnitude will potentially generate environmental impacts to air quality. In Section 3.2, *Air Quality*, of the EIR, the County has identified 11 mitigation measures that will address the impact to air quality related to air quality standards, sensitive receptors, and the recommended project's contribution to cumulative impacts: Air-1 through Air-11.

Measure Air-1

Water or a stabilizing agent shall be applied during Tier II to exposed surfaces in sufficient quantity to prevent generation of dust plumes. Soil moistening shall be required to treat exposed soil during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. Prior to advertising for construction bids for each element, the plans and specifications shall be reviewed by the lead agency to ensure that the

plans and specifications for each element of the project include the requirement for the construction contractor to ensure that soil shall be moistened not more than 15 minutes prior to the daily commencement of soil-moving activities and three times a day, or four times a day under windy conditions (when winds exceed 25 miles per hour as instantaneous gusts), in order to maintain a soil moisture content of 12 percent, as determined by American Society for Testing and Materials method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency. The construction contractor shall demonstrate compliance with this measure through the submission of weekly monitoring reports to the lead agency. At a minimum, active operations shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type that is part of the active operation. The lead agency shall also ensure that the plans and specifications for each element of the project include a requirement for ground cover to be replaced in disturbed areas as quickly as practicable and that the County appoints a construction relations officer to act as a community liaison concerning on-site construction activity including addressing issues related to fugitive dust generation.

Measure Air-2

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

Measure Air-3

Discontinuing Tier II construction activities that occur on unpaved surfaces during windy conditions (when winds exceed 25 miles per hour as instantaneous gusts) shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to soliciting construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cease construction activities that occur on unpaved surfaces during periods when winds exceed 25 miles per hour as instantaneous gusts.

Measure Air-4

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

of each workday. Street sweepers should also comply with SCAQMD Rules 1186 and 1186.1 and use reclaimed water, if available.

Measure Air-5

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

Measure Air-6

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

Measure Air-7

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

Measure Air-8

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

Measure Air-9

All equipment shall be turned off when not in use. Engine idling of all equipment used during both construction and operation/maintenance shall be minimized and/or limited to no more than five minutes in accordance with state law. All equipment engines shall be maintained in good operating condition and in tune per manufacturers' specification. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure the construction equipment meet the aforementioned criteria. All on-site

construction equipment shall be required to meet U.S. EPA Tier 2 or higher emissions standards according to the following:

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

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

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

Measure Air-10

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

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

Measure Air-11

The following measures shall be implemented, wherever feasible, to reduce operational air quality impacts:

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

CULTURAL RESOURCES

Significant Impact:

Implementation of Tier II of the project will result in potentially significant impacts to cultural resources related to paleontological resources, human remains, and historic resources. Other impacts to cultural resources will be reduced to below the level of significance through mitigation.

Finding:

A Statement of Overriding Considerations has been prepared (see Section IX of this document) to address the cultural resources impacts associated with the construction and operation of the project. Implementation of mitigation measure Cultural-1 will reduce any potentially significant impacts to cultural resources related to an adverse change in the significance of a unique paleontological resource discovered during implementation of Tier II to below the level of significance.

Implementation of mitigation measure Cultural-2 will reduce any potentially significant impacts to human remains discovered during implementation of Tier II to below the level of significance.

Implementation of mitigation measure Cultural-3 will reduce Tier II impacts to the Augustus F. Hawkins Comprehensive Mental Health Center; Dr. H. Claude Hudson Auditorium; Interns and Physicians Building; Martin Luther King, Jr. Medical Center Campus Historic District; and Multi-Service Ambulatory Care Center (MACC) to below the level of significance.

Implementation of mitigation measures Cultural-4 and Cultural-5 will reduce to the maximum extent feasible any impacts to the Augustus F. Hawkins Comprehensive Mental Health Center; Dr. H. Claude Hudson Auditorium; Interns and Physicians Building; Martin Luther King, Jr. Medical Center Campus Historic District; and MACC resulting from implementation of Tier II

of the project. However, the demolition of a historic resource will remain a significant adverse impact.

The EIR considered the No Project Alternative and the following five action alternatives:

- Alternative 1: Reduced Project Size Alternative (900,000 square foot Tier II)
- Alternative 2: Re-opening the Existing MACC Alternative
- Alternative 3: Public Transportation Focused Alternative
- Alternative 4: 500 beds (in Tier I) Alternative
- Alternative 5: No Tier II Alternative

Section 4.0 evaluates the effectiveness of each of the alternatives to achieve the basic objectives of the project as described in Section 2.0 of the EIR. The project will meet all of the basic objectives of the County. Although the No Project Alternative is the environmentally superior alternative and has been analyzed as required by CEQA, it is not capable of meeting most of the basic objectives of the project. Following the No Project Alternative, the No Tier II Alternative is the environmentally superior alternative as it would result in the least amount of potentially significant environmental impacts. However, like the No Project Alternative, the No Tier II Alternative is not capable of meeting most of the basic objectives of the project that are associated with Tier II of the project.

Facts:

The County recognizes that a project of this magnitude will potentially generate environmental impacts to cultural resources. The County has identified five mitigation measures in Section 3.3, *Cultural Resources,* of the EIR that will address the potential impacts of the project to cultural resources: Cultural-1, Cultural-2, Cultural-3, Cultural-4, and Cultural-5.

Paleontological Resources

Measure Cultural-1

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

- Paleontological Resources Sensitivity Training is required for all project personnel prior to the start of ground-disturbing activities. This brief (approximately 15 minute) field training reviews what fossils are, what fossils might potentially be found, and the appropriate procedures to follow if fossils are found.

- Prior to any ground-disturbing activities, the County of Los Angeles shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain unique paleontological resources.

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data.

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

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

Human Remains

Measure Cultural-2

Although the discovery of human remains is not anticipated during ground-disturbing activities for the project, a process has been delineated for addressing the unanticipated discovery of human remains:

- Unanticipated Discovery of Human Remains (Public Resources Code 5097). The Los Angeles County Coroner shall be notified within 24 hours of the discovery of human remains. Upon discovery of human remains, there shall be no further excavation or disturbance of the site or any of that area reasonably suspected to overlie adjacent human remains until the following conditions are met:

    - The Los Angeles County Coroner has determined that no investigation of the cause of death is required

    - Whenever the Native American Heritage Commission receives notification of a discovery of Native American human remains from the Los Angeles County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. If the remains are of Native American origin, the descendants from the deceased Native Americans shall complete their inspection and make recommendations or preferences in writing to the landowner or the person responsible for the excavation work, for treatment or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

Historic Resources

Potentially significant adverse impacts to historic resources have been identified in relation to five historic resources as a result of implementation of the Tier II project: Augustus F. Hawkins Comprehensive Medical Health Center; Dr. H. Claude Hudson Auditorium; Interns and Physicians Building; Martin Luther King, Jr. Medical Center Campus Historic District; and MACC. Three mitigation measures have been identified for implementation during with Tier II of the project to reduce impacts to the maximum extent practicable: Cultural-3, Cultural-4, and Cultural-5. In the event that the five historic resources are not removed or otherwise impacted through significant modifications or alterations to the character-defining features of these resources, this impact would be below the level of significance and would not require mitigation.

Measure Cultural-3

Tier II impacts to four significant historic resources (Augustus F. Hawkins Comprehensive Medical Health Center, Dr. H. Claude Hudson Auditorium, Interns and Physicians Building, and Multi-Service Ambulatory Care Center) and the integrity of the Martin Luther King, Jr. Medical Center Campus Historic District (a fifth historic resource) shall be reduced to below

the level of significance through utilization of the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines of Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* for any alterations, including all site work, structural upgrades, architectural, and mechanical systems improvements and repairs. The work shall conform to the standards and guidelines for "rehabilitation." Conformance with the Secretary of the Interior's Standards shall be monitored by an architectural historian or historic architect who meets the Secretary of the Interior's Professional Qualification Standards. Completion of this mitigation measure shall be monitored and enforced by the County of Los Angeles.

Measure Cultural-4

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

Measure Cultural-5

Impacts resulting from the loss of integrity of the Martin Luther King, Jr. Medical Center Campus Historic District such that its significance is materially impaired will be reduced to the maximum extent feasible through the development of a retrospective exhibit detailing the history of the Martin Luther King, Jr. Medical Center Campus Historic District, its significance, and its important details and features. The retrospective exhibit shall be in the form of a physical exhibit installed on the Martin Luther King, Jr. Medical Center Campus either within a building or on a freestanding kiosk or comparable structure or installation on the property. The exhibit shall commemorate the historic appearance of the district and provide the public with sufficient information to understand its historic significance.

The exhibit shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The exhibit should be completed within a period of no more than two years from the date of completion of Tier II of the project.

GREENHOUSE GAS EMISSIONS

Significant Impact:

Implementation of Tier II of the project will result in potentially significant impacts to construction-related GHG emissions. Operational impacts will be reduced to below the level of significance with mitigation.

Finding:

A Statement of Overriding Considerations has been prepared (see Section IX of this document) to address the greenhouse gas emissions impact associated with construction of the project.

Mitigation measure Greenhouse Gas-1 will reduce CO_2 emissions resulting from operation of Tier II of the project, thereby assisting in compliance with the goals of Assembly Bill 32 to reduce CO_{2e} emissions to 1990 levels by the year 2020. Mitigation measure Greenhouse Gas-1 will ensure that indirect and cumulative GHG emission impacts will be reduced to the maximum extent feasible. However, potential GHG emission impacts associated with construction and operation of Tier II will remain significant and unavoidable.

The EIR considered the No Project Alternative and the following five action alternatives:

- Alternative 1: Reduced Project Size Alternative (900,000 square foot Tier II)
- Alternative 2: Re-opening the Existing MACC Alternative
- Alternative 3: Public Transportation Focused Alternative
- Alternative 4: 500 beds (in Tier I) Alternative
- Alternative 5: No Tier II Alternative

Section 4.0 evaluates the effectiveness of each of the alternatives to achieve the basic objectives of the project described in Section 2.0 of the EIR. The project will meet all of the basic objectives of the County. Although the No Project Alternative is the environmentally superior alternative and has been analyzed as required by CEQA, it is not capable of meeting most of the basic objectives of the project. Following the No Project Alternative, the No Tier II Alternative is the environmentally superior alternative as it would result in the least amount of potentially significant environmental impacts. However, like the No Project Alternative, the No Tier II Alternative is not capable of meeting most of the basic objectives of the project that are associated with Tier II of the project.

Facts:

The County recognizes that a project of this magnitude will potentially generate environmental impacts to recreation. The County has identified in Section 3.5 of the EIR, one mitigation measure that will address the impact to GHG emissions related to project: Greenhouse Gas-1.

Measure Greenhouse Gas-1

Prior to construction of the project, the final design plan and schemes for Tier II shall be reviewed to ensure that the County of Los Angeles conforms to its commitments pursuant to the California Climate Action Registry, and the greenhouse gas emissions reduction targets established in Assembly Bill 32 are dependent on the incorporation of this mitigation measure,

which is based on seven of the sustainable design strategies or comparable measures recommended by the California Office of Attorney General to reduce carbon dioxide emissions per capita:

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

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

NOISE

Significant Impact:

Implementation of Tier II of the project will result in potentially significant impacts to noise related to groundbourne temporary ambient noise increase during construction, vibration, and mechanical noise during construction. Groundbourne vibration and mechanical noise during construction would be reduced to below the level of significance through mitigation.

Finding:

A Statement of Overriding Considerations has been prepared (see Section IX of this document) to address the noise impacts associated with construction of the project.

Noise or vibration related impacts to residential structures located 80 feet (or further) away from the project site would be below the level of significance. The nearest residential land use is approximately 50 feet south of the project. Implementation of mitigation measures Noise-1 and Noise-2 will reduce construction noise at residential properties to the east and west of the campus to below the level of significance; however, construction noise levels will exceed the permissible noise level of 75 dBA at residences south of the project site that are within 80 feet

of the project property. Therefore, noise impacts from construction, while temporary, will remain significant and unavoidable.

Implementation of mitigation measure Noise-3 will reduce significant impacts related to potential building damage from vibration during construction to below the level of significance. However, vibration levels will still be perceptible at sensitive receptors; therefore, vibration levels during construction of the project will result in a significant and unavoidable impact.

Implementation of mitigation measure Noise-4 will reduce significant impacts related to mechanical noise to below the level of significance.

The EIR considered the No Project Alternative and the following five action alternatives:

- Alternative 1: Reduced Project Size Alternative (900,000 square foot Tier II)
- Alternative 2: Re-opening the Existing MACC Alternative
- Alternative 3: Public Transportation Focused Alternative
- Alternative 4: 500 beds (in Tier I) Alternative
- Alternative 5: No Tier II Alternative

Section 4.0 evaluates the effectiveness of each of the alternatives to achieve the basic objectives of the project described in Section 2.0 of the EIR. The project will meet all of the basic objectives set forth by the County. Although the No Project Alternative is the environmentally superior alternative and has been analyzed as required by CEQA, it is not capable of meeting most of the basic objectives of the project. Following the No Project Alternative, the No Tier II Alternative is the environmentally superior alternative as it would result in the least amount of potentially significant environmental impacts. However, like the No Project Alternative, the No Tier II Alternative is not capable of meeting most of the basic objectives of the project that are associated with Tier II of the project.

Facts:

The County recognizes that a project of this magnitude will potentially generate environmental impacts to noise. The County has identified in Section 3.8, *Noise*, of the EIR, four mitigation measures that will address the impact to noise related to the project: Noise-1, Noise-2, Noise-3, and Noise-4.

Measure Noise-1

The County of Los Angeles shall require that the plans and specifications require that construction equipment be equipped with state-of-the-art noise-muffling devices. Barriers or curtains shall be required to be installed close to equipment to shield the equipment from the receptor. Barriers or curtains utilized at the project site shall be required to reduce A-weighted construction noise levels at nearby sensitive receptors by a minimum of 10 decibels or to the maximum extent feasible. The height and length of the barriers or curtains shall be determined based on the location of the construction activity and receptor.

Because of the proximity of the source and receptors, the noise impact will depend on the location of the noise sources. Prior to the start of demolition and construction, the contractor shall develop a noise control plan based on the actual equipment that will be used during

demolition and construction, and the location of various demolition and construction activities. If the actual equipment noise levels are not available, equipment noises shall be measured in the field. The noise control plan shall predict the noise levels with actual equipment and with barriers or curtains in place. In addition, the plan shall take into account the demolition and equipment mix that would be operated at the same time. Equipment mix and/or the number of equipment operating shall be considered in reducing the noise levels.

Measure Noise-2

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

Measure Noise-3

The distance at which impact pile driving would not exceed a peak particle velocity of 0.2 inch per second at a residence would be 55 feet. Therefore, the County of Los Angeles shall require that impact pile driving shall not be utilized within 55 feet of a residential structure. Should pile driving be necessary within 55 feet of a residence, sonic pile driving shall be utilized.

Measure Noise-4

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

SECTION V
FINDINGS REGARDING ALTERNATIVES

Alternatives were analyzed in the Environmental Impact Report (EIR) for the Martin Luther King, Jr., Medical Center Campus Redevelopment project (project or recommended project) consistent with the recommendations of Section 15126.6 of the State of California Environmental Quality Act (CEQA) Guidelines, which require evaluation of a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant project effects. The analysis of alternatives is limited to those that the County of Los Angeles (County) determines could feasibly attain most of the basic objectives of the project. Section 15126.6(f) of the State CEQA Guidelines describes feasibility as being dependent on site suitability, economic viability, availability of infrastructure, general plan consistency, consistency with other plans or regulatory limitations, jurisdictional boundaries, and the ability of the project proponent to gain access to or acquire an alternative site. As a result of the analysis contained in the project EIR regarding the environmental, health, and social characteristics of the project and alternatives, the County recommends approval of the project. Support for the project is directly responsive to the ability to attain all of the objectives of the project and reduce significant impacts. Therefore, the project will meet all objectives of the project and reduce the identified significant environmental impacts to the maximum extent feasible.

Six alternatives were considered and evaluated in detail in the EIR, including the No Project Alternative and five alternatives that would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant impacts of the project, particularly impacts related to air quality, cultural resources, greenhouse gas emissions, noise, and transportation and traffic. As a result of the project formulation process, the County explored the alternatives to assess their ability to fulfill most of the basic objectives of the project. The resulting range of alternatives considered in this EIR consists of the following six alternatives:

- No Project Alternative
- Reduced Project Size Alternative (900,000 square foot Tier II)
- Re-opening the Existing MACC Alternative
- Public Transportation Focused Alternative
- 500 beds (in Tier I Alternative)
- No Tier II Alternative

As required by CEQA, the No Project Alternative considers the effects of continuing to operate the project area as it currently exists. The additional alternatives evaluate the effects of a reduced project site, alternatives to the Tier II component of the project, or altering or enhancing the existing medical center facilities.

The ability of the project, the No Project Alternative, and the five alternatives listed above to meet the objectives of the project is summarized in Table V-1, *Summary of Project and Alternatives' Ability to Attain Project Objectives*.

The recommended project would meet all of the basic objectives of the County. Although the No Project Alternative is the environmentally superior alternative, it is not capable of meeting most of the basic objectives of the recommended project; it has been analyzed as required by CEQA. Following the No Project Alternative, the No Tier II Alternative is the environmentally superior alternative (Table V-1, *Summary of Project and Alternatives' Ability to Attain Project Objectives*).

TABLE V-1
SUMMARY OF PROJECT AND ALTERNATIVES' ABILITY TO ATTAIN PROJECT OBJECTIVE

	Recommended Project	No Project	Alternative No. 1: Reduced Project Size	Alternative No. 2: Re-opening the Existing MACC	Alternative No. 3: Public Transportation Focused	Alternative No. 4: 500 beds	Alternative No. 5: No Tier II
Tier I: Project Development Objective							
1. Revitalize the Martin Luther King, Jr. Medical Center Campus through the provision of comprehensive medical care	Yes	No	Yes	No	No	Yes	Yes
2. Demonstrate leadership in sustainable planning and design	Yes	No	Yes	No	No	Yes	Yes
3. Create a campus environment that encourages pedestrian movement and optimizes connectivity, staff interaction, and links to the community	Yes	No	Yes	No	No	Yes	Yes
4. Develop a campus that is contextually integrated with the County of Los Angeles and respects the surrounding communities	Yes	No	Yes	No	No	Yes	Yes
5. Improve the efficiency and quality of staff and tenant services	Yes	No	Yes	No	No	Yes	Yes

TABLE V-1
SUMMARY OF PROJECT AND ALTERNATIVES' ABILITY TO ATTAIN PROJECT OBJECTIVE, Continued

	Recommended Project	No Project	Alternative No. 1: Reduced Project Size	Alternative No. 2: Re-opening the Existing MACC	Alternative No. 3: Public Transportation Focused	Alternative No. 4: 500 beds	Alternative No. 5: No Tier II
6. Maintain the 2,100-square-foot Genesis Clinic; 2,580-square-foot Oasis Clinic (old); 1,850-square-foot Oasis Clinic (new); 10,950-square-foot Registration Building; 226,818-square-foot Augustus F. Hawkins Comprehensive Mental Health Center; 187,676-square-foot Inpatient Tower; 7,878-square-foot Pediatric Acute Care; 26,355-square-foot Medical Records and Laundry; 24,103-square-foot Central Plant; 15,648-square-foot Plant Management; 52,276-square-foot North Support Building; 34,762-square-foot South Support Building; 124,391-square-foot Interns and Physicians Building; 3,922-square-foot Claude Hudson Auditorium; 1,100-square-foot MRI Building; and 12,265-square-foot Hub Clinic Building	Yes	Yes	Yes	Yes	Yes	Yes	Yes
7. Provide a 24,700-building-gross-square-footage (BGSF) space to accommodate the Ancillary Building to house the cafeteria, administrative functions, and support services for the MACC and the Inpatient Tower	Yes	No	Yes	No	Yes	No	Yes

TABLE V-1
SUMMARY OF PROJECT AND ALTERNATIVES' ABILITY TO ATTAIN PROJECT OBJECTIVE, Continued

	Recommended Project	No Project	Alternative No. 1: Reduced Project Size	Alternative No. 2: Re-opening the Existing MACC	Alternative No. 3: Public Transportation Focused	Alternative No. 4: 500 beds	Alternative No. 5: No Tier II
8. Provide a 132,000-BGSF space to accommodate the MACC program	Yes	No	Yes	No	Yes	No	Yes
9. Provide 34,000 square feet of tenant improvements to accommodate support functions in the North Support, South Support, Interns and Physicians, and Plant Management Buildings	Yes	No	Yes	No	Yes	No	Yes
10. Connect to an upgraded central plant to service the MACC, North Support Building, South Support Building, Inpatient Tower and Interns and Physicians Building	Yes	No	Yes	No	No	No	Yes
11. Provide a parking area to allow sufficient parking for patients, client, visitors, employees, medical staff; site work; and landscaping	Yes	No	Yes	Yes	No	Yes	Yes
12. Provide for a possible relocation of the MRI Building	Yes	No	Yes	No	No	No	Yes

TABLE V-1
SUMMARY OF PROJECT AND ALTERNATIVES' ABILITY TO ATTAIN PROJECT OBJECTIVE, Continued

	Recommended Project	No Project	Alternative No. 1: Reduced Project Size	Alternative No. 2: Re-opening the Existing MACC	Alternative No. 3: Public Transportation Focused	Alternative No. 4: 500 beds	Alternative No. 5: No Tier II
Tier II: Master Plan Development Objective							
13. Provide opportunities for development of up to 1,814,696 square feet of mixed use, including medical office, commercial, retail, residential, recreational, office space, and other development in support of the campus that are appurtenant to and compatible with the primary land use of a community-based health program facility	Yes	No	No	No	No	No	No
14. Provide sufficient parking for mixed-use development	Yes	No	Yes	No	No	No	No

Based on the analysis provided in the EIR, only the No Project Alternative is capable of reducing the significant and unavoidable impacts to both Tier I and Tier II components of the project. Evaluation of a no project alternative is required, as well as an environmentally superior alternative if the no project alternative is the environmentally superior alternative. For this project, the Environmentally Superior Action Alternative is the No Project Alternative. Although this alternative is capable of reducing the significant impacts discussed above; it would only meet one of the 14 project objectives. The No Tier II Alternative would be the environmental superior alternative for the project following the No Project Alternative. While this alternative would reduce or avoid impacts to aesthetics, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous resources, hydrology and water quality, noise, transportation and traffic, and utilities and services systems that are associated with Tier II of the project; as with the project, the No Tier II Alternative would have the same potential Tier I impacts as the project. Furthermore, this alternative would fail to meet all of the project objectives.

Table V-2, *Tier I Comparative Analysis of Impacts for Project and Alternatives,* provides a comparative analysis for the project, the No Project Alternative, and the five alternatives discussed in this document. Table V-3, *Tier II Comparative Analysis of Impacts for Project and Alternatives,* provides a comparative analysis for the project, the No Project Alternative, and the five alternatives discussed in this document.

TABLE V-2
TIER I COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES

Resource	Project	No Project	Reduced Project Size	Re-opening the Existing MACC	Public Transportation Focused	500 Beds	No Tier II Alternative
Aesthetics	Implementation of the project will result in significant impacts to aesthetics related to light and glare. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to aesthetics. *Comparative Impact:* Positive	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to aesthetics that would require mitigation. *Comparative Impact:* Neutral	Unlike the project, the Re-opening of the Existing MACC Alternative would not have the potential to result in significant impacts to aesthetics. *Comparative Impact:* Positive	Like Tier I of the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to aesthetics that would require mitigation. *Comparative Impact:* Neutral	Like Tier I of the recommended project, the 500 Beds (in Tier I) Alternative would have the potential to result in impacts to aesthetics that would require mitigation. *Comparative Impact:* Neutral	Like Tier I of the recommended project, the No Tier II Alternative would have the potential to result in impacts to aesthetics that would require mitigation. *Comparative Impact:* Neutral
Air Quality	Implementation of the project will result in significant impacts to air quality related to air quality standards, cumulative, and sensitive receptors during construction. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to air quality. *Comparative Impact:* Positive	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to air quality that would require mitigation. *Comparative Impact:* Neutral	Unlike the project, the Re-opening of the Existing MACC Alternative would have the potential to result in significant impacts to air quality. *Comparative Impact:* Positive	Like the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to air quality that would require mitigation. *Comparative Impact:* Neutral	Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in impacts to air quality. *Comparative Impact: Positive*	Like Tier I of the recommended project, the No Tier II Alternative would have the potential to result in impacts to air quality that would require mitigation. *Comparative Impact:* Neutral
Cultural Resources	Implementation of the project will result in significant impacts to cultural resources related to historic resource, paleontological resource, and human remains. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to cultural resources. *Comparative Impact:* Positive	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to cultural resources that would require mitigation. *Comparative Impact:* Neutral	Unlike the project, Re-opening of the Existing MACC Alternative would not have the potential to result in significant impacts to cultural resources. *Comparative Impact:* Positive	Like Tier I of the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to cultural resources that would require mitigation. *Comparative Impact:* Neutral	Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in impacts to cultural resources. *Comparative Impact: Positive*	Like Tier II of the recommended project, Tier I of the No Tier II Alternative would have the potential to result in impacts to cultural resources that would require mitigation. *Comparative Impact:* Neutral

TABLE V-2
TIER I COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES, Continued

Resource	Project	No Project	Reduced Project Size	Re-opening the Existing MACC	Public Transportation Focused	500 Beds	No Tier II Alternative
Geology and Soils	Implementation of the project will result in significant impacts to geology and soils related to soil erosion or loss of top soil, geologic unit or unstable soil, and expansive soil. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to geology and soils. *Comparative Impact:* Positive	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to geology and soils that would require mitigation. *Comparative Impact:* Neutral	Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to geology and soils although the anticipated seismic improvements that would be required under this alternative would be more considerable than the project. *Comparative Impact:* Negative	Like Tier I of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to geology and soils that would require mitigation. *Comparative Impact:* Neutral	Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in impacts to geology and soils. *Comparative Impact: Positive*	Like Tier I of the recommended project, Tier I of the No Tier II Alternative would have the potential to result in impacts to geology and soils that would require mitigation. *Comparative Impact:* Neutral
Greenhouse Gas Emissions	Implementation of the project will result in significant impacts to greenhouse gas emissions related to operation. *Impact:* Significant and unavoidable	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to greenhouse gas emissions. *Comparative Impact:* Positive	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to greenhouse gas emissions. *Comparative Impact:* Neutral	Unlike the project, the Re-opening of the Existing MACC Alternative would not have the potential to result in significant impacts to greenhouse gas emissions. *Comparative Impact:* Positive	Like Tier I of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to greenhouse gas emissions. *Comparative Impact:* Neutral	Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in impacts to greenhouse gas emissions. *Comparative Impact: Positive*	Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in impacts to GHG emissions with regard to Tier I development. *Comparative Impact:* Neutral
Hazards and Hazardous Materials	Implementation of the project will result in significant impacts to hazards and hazardous materials related to accidental release, 0.25 mile of an existing or proposed school, and Government Code Section 65962.5. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. *Comparative Impact:* Positive	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to hazards and hazardous materials that would require mitigation. *Comparative Impact:* Neutral	Like the recommended project, the Re-opening of the Existing MACC Alternative would have the potential to result in impacts to hazards and hazardous materials that would require mitigation. *Comparative Impact:* Neutral	Like Tier I of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hazards and hazardous materials that would require mitigation. *Comparative Impact:* Neutral	Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in impacts to hazards and hazardous materials. *Comparative Impact: Positive*	Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in impacts to hazards and hazardous materials that would require mitigation. *Comparative Impact:* Neutral

TABLE V-2
TIER I COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES, Continued

Resource	Project	No Project	Reduced Project Size	Re-opening the Existing MACC	Public Transportation Focused	500 Beds	No Tier II Alternative
Hydrology and Water Quality	Implementation of the project will result in significant impacts to hydrology and water quality related to water quality standards, waste discharge, runoff water, and degrade water quality during construction and limited operation. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to hydrology and water quality. *Comparative Impact:* Positive	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to hydrology and water quality that would require mitigation. *Comparative Impact:* Neutral	As with the project, the Re-opening of the Existing MACC Alternative would have the potential to result in significant impacts to hydrology and water quality. However, the anticipated impacts associated with this alternative would be more considerable than the project. *Comparative Impact:* Negative	Like Tier I of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hydrology and water quality that would require mitigation. *Comparative Impact:* Neutral	Like the recommended project, this alternative would have the potential to result in impacts to hydrology and water quality that would require mitigation. *Comparative Impact:* Neutral	Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in impacts to hydrology and water quality that would require mitigation. *Comparative Impact:* Neutral
Noise	Implementation of the project will result in significant impacts to noise related to groundbourne vibration and mechanical noise during construction. *Impact:* Significant and unavoidable	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to noise. *Comparative Impact:* Positive	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to noise. *Comparative Impact:* Neutral	Unlike the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to noise. *Comparative Impact:* Positive	Like Tier I of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to noise. *Comparative Impact:* Neutral	Unlike the recommended project, the 500 Beds Alternative would not have the potential to result in significant impacts to noise. *Comparative Impact:* Positive	Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in significant impacts to noise. *Comparative Impact:* Neutral
Population and Housing	No significant impacts related to population and housing will arise from implementation of the project. *Impact:* None[1]	As with the project, the No Project Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral	Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral	Like Tier I of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral	Like the recommended project, the 500 Beds Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral	Like the recommended project, Tier I of the No Tier II Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral

[1] The term "none" is used in tables V-2-1 and V-2-2 to identify impacts issue areas that resulted in "no impact" or "less than significant" impacts that did not require mitigation and were not found to be significant after mitigation.

TABLE V-2
TIER I COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES, Continued

Resource	Project	No Project	Reduced Project Size	Re-opening the Existing MACC	Public Transportation Focused	500 Beds	No Tier II Alternative
Public Services	No significant impacts related to public services will arise from implementation of the project. *Impact:* None	As with the project, the No Project Alternative would not have the potential to result in significant impacts to public services. *Comparative Impact:* Neutral	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to public services. *Comparative Impact:* Neutral	Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to public services. *Comparative Impact:* Neutral	Like Tier I of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts public services. *Comparative Impact:* Neutral	Like the recommended project, the 500 Beds Alternative would not have the potential to result in significant impacts to public services. *Comparative Impact:* Neutral	Like the recommended project, Tier I of the No Tier II Alternative would not have the potential to result in significant impacts to public services. *Comparative Impact:* Neutral
Recreation	No significant impacts related to recreation will arise from implementation of the project. *Impact:* None	As with the project, the No Project Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral	Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral	Like Tier I of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral	Like the recommended project, the 500 Beds Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral	Like the recommended project, Tier I of the No Tier II Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral
Transportation and Traffic	Implementation of the project will result in significant impacts to transportation and traffic related to circulation system and congestion during construction. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to transportation and traffic and would not require mitigation. *Comparative Impact:* Positive	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to transportation and traffic that would require mitigation. *Comparative Impact:* Neutral	Unlike Tier I of the project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to transportation and traffic. *Comparative Impact:* Positive	Unlike the recommended project, the Public Transportation Focused Alternative would not have the potential to result in impacts to transportation and traffic. *Comparative Impact:* Positive	Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in significant impacts to transportation and traffic. *Comparative Impact:* Positive	Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in significant impacts to transportation and traffic that would require mitigation. *Comparative Impact:* Neutral
Utilities and Service Systems	No significant impacts related to utilities and service systems will arise from implementation of the project. *Impact:* None	As with the project, the No Project Alternative would not have the potential to result in significant impacts to utilities and services systems. *Comparative Impact:* Positive[2]	As with the project, the Reduced Project Site Alternative would have the potential to result in significant impacts to utilities and service systems. *Comparative Impact:* Neutral	Unlike Tier I of the project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to utilities and service systems. *Comparative Impact: Negative*	Like Tier I of the recommended project, the Public Transportation Focused Alternative would not be expected to result in impacts to utilities and service systems. *Comparative Impact:* Neutral	Unlike Tier I of the recommended project, the 500 Beds Alternative would have the potential to result in significant impacts to utilities and service systems. *Comparative Impact:* Positive	Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in significant impacts to utilities and service systems. *Comparative Impact:* Neutral

[2] This impact is reflected as positive because this alternative would not alter the existing utilities and services systems at the campus while the project would, however, operation of Tier I of the project would be expected to result in benefits to utilities and services systems.

TABLE V-3
TIER II COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES

Resource	Project	No Project	Reduced Project Size	Re-opening the Existing MACC	Public Transportation Focused	500 Beds	No Tier II Alternative
Aesthetics	Implementation of the project will result in significant impacts to aesthetics related to visual character and light/glare. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to aesthetics. *Comparative Impact:* Positive	As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to aesthetics although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to aesthetics although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to aesthetics. *Comparative Impact:* Neutral	Like Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would have the potential to result in significant impacts to aesthetics although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Unlike Tier II of the recommended project, the No Tier II Alternative would not result in impacts to aesthetics. *Comparative Impact:* Positive
Air Quality	Implementation of the project will result in significant impacts to air quality related to air quality standards, cumulative, sensitive receptors during construction and limited operation. *Impact:* Significant and unavoidable	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to air quality. *Comparative Impact:* Positive	As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to air quality although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to air quality although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Like the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to air quality. *Comparative Impact:* Neutral	Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to ambient air quality. *Comparative Impact:* Positive	Unlike Tier II of the recommended project, the No Tier II Alternative would not have the potential to result in significant impacts to ambient air quality. *Comparative Impact:* Positive
Cultural Resources	Implementation of the project will result in significant impacts to cultural resources related to paleontological resource and human remains, historic resource, paleontological resource. *Impact:* Significant and unavoidable (historic resource, paleontological resource, human remains)	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to cultural resources. *Comparative Impact:* Positive	As with Tier II the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to cultural resources. *Comparative Impact:* Neutral	Unlike Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to cultural resources. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to cultural resources. *Comparative Impact:* Neutral	Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to cultural resources. *Comparative Impact:* Positive	Unlike Tier II of the recommended project, the No Tier II Alternative would not have the potential to result in significant impacts to cultural resources. *Comparative Impact:* Positive

TABLE V-3
TIER II COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES, Continued

Resource	Project	No Project	Reduced Project Size	Re-opening the Existing MACC	Public Transportation Focused	500 Beds	No Tier II Alternative
Geology and Soils	Implementation of the project will result in significant impacts to geology and soils related to soil erosion or loss of top soil, geologic unit or unstable soil, and expansive soil. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to geology and soils. *Comparative Impact:* Positive	As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to geology and soils although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to geology and soils although it is anticipated that he seismic improvements under this alternative would be more considerable than the project. *Comparative Impact:* Negative	Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to geology and soils. *Comparative Impact:* Neutral	Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to geology and soils, although it is anticipated that the seismic improvements under this alternative would be more considerable than the project. *Comparative Impact:* Negative	Unlike Tier II of the recommended project, the No Tier II Alternative would not have the potential to result in significant impacts to geology and soils. *Comparative Impact:* Positive
Greenhouse Gas Emissions	Implementation of the project will result in significant impacts to greenhouse gas emissions related to construction and operation. *Impact:* Significant and unavoidable (construction)	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to greenhouse gas emissions. *Comparative Impact:* Positive	As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to greenhouse gas emissions although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Unlike Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant construction related impacts to greenhouse gas emissions. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to greenhouse gas emissions. *Comparative Impact:* Neutral	Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to GHG emissions. *Comparative Impact:* Positive	Unlike Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to GHG emissions. *Comparative Impact:* Positive
Hazards and Hazardous Materials	Implementation of the project will result in significant impacts to hazards and hazardous materials related to accidental release, 0.25 mile of an existing or proposed school, and Government Code Section 65962.5. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. *Comparative Impact:* Positive	As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to hazards and hazardous materials although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Unlike Tier II of the recommended project, Tier II of the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hazards and hazardous materials. *Comparative Impact:* Neutral	Unlike Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. *Comparative Impact:* Positive	Unlike Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. *Comparative Impact:* Positive

TABLE V-3
TIER II COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES, Continued

Resource	Project	No Project	Reduced Project Size	Re-opening the Existing MACC	Public Transportation Focused	500 Beds	No Tier II Alternative
Hydrology and Water Quality	Implementation of the project will result in significant impacts to hydrology and water quality related to water quality standards, waste discharge, runoff water, and degrade water quality during construction and operation. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to hydrology and water quality. *Comparative Impact:* Positive	As with Tier II the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to hydrology and water quality although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Like Tier II of the recommended project, Tier II of the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to hydrology and water quality. *Comparative Impact:* Neutral	Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hydrology and water quality. *Comparative Impact:* Neutral	Like Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would have the potential to result in significant impacts to hydrology and water quality. *Comparative Impact:* Neutral	Unlike Tier I of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. *Comparative Impact:* Positive
Noise	Implementation of the project will result in significant impacts to noise related to groundbourne vibration and mechanical noise during construction, temporary ambient noise increase during construction. *Impact:* Significant and unavoidable (temporary ambient noise increase during construction)	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to noise. *Comparative Impact:* Positive	As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to noise although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Unlike Tier II of the recommended project, Tier II of the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to noise. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to noise. *Comparative Impact:* Neutral	Unlike Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to noise. *Comparative Impact:* Positive	Unlike Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to noise. *Comparative Impact:* Positive
Population and Housing	No significant impacts related to population and housing will arise from implementation of the project. *Impact:* None	As with the project, the No Project Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral	As with Tier II of the recommended project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral	Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral	Like Tier II of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral	As with Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral	As with Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to population and housing. *Comparative Impact:* Neutral

TABLE V-3
TIER II COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES, Continued

Resource	Project	No Project	Reduced Project Size	Re-opening the Existing MACC	Public Transportation Focused	500 Beds	No Tier II Alternative
Public Services	No significant impacts related to public services will arise from implementation of the project. *Impact:* None	As with the project, the No Project Alternative would not have the potential to result in significant impacts to public services. *Comparative Impact:* Neutral	As with Tier II of the recommended project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to public services. *Comparative Impact:* Neutral	Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to public services. *Comparative Impact:* Neutral	Like Tier II of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts public services. *Comparative Impact:* Neutral	As with Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to public services. *Comparative Impact:* Neutral	As with Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to public services. *Comparative Impact:* Neutral
Recreation	No significant impacts related to recreation will arise from implementation of the project. *Impact:* None	As with the project, the No Project Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral	As with Tier II of the recommended project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral	Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral	Like Tier II of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral	As with Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral	As with Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to recreation. *Comparative Impact:* Neutral
Transportation and Traffic	Implementation of the project will result in significant impacts to transportation and traffic related to circulation system and congestion during construction, operation, and cumulatively. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to traffic and transportation. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to transportation and traffic although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to transportation and traffic although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Unlike the recommended project, the Public Transportation Focused Alternative would not have the potential to result in impacts to transportation and traffic. *Comparative Impact:* Positive	Unlike Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to transportation and traffic. *Comparative Impact:* Positive	As with Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to transportation and traffic although the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive
Utilities and Service Systems	Implementation of the project will result in significant impacts to utilities and service systems related to wastewater treatment requirements and solid waste compliance. *Impact:* Mitigated to below the level of significance	Unlike the project, the No Project Alternative would not have the potential to result in significant impacts to Utilities and Services Systems. *Comparative Impact:* Positive	Like Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to utilities and services systems, but the impacts would not be as extensive as those related to the project. *Comparative Impact:* Positive	Like Tier II of the recommended project, Tier II of the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to utilities and service systems. *Comparative Impact:* Neutral	Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in impacts to utilities and service systems. *Comparative Impact:* Neutral	Like Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would have the potential to result in significant impacts to utilities and service systems. *Comparative Impact:* Neutral	Unlike Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to utilities and service systems. *Comparative Impact:* Positive

V.A NO PROJECT ALTERNATIVE

Description of Alternative: Under the No Project Alternative, the existing conditions described in this document would remain unchanged. The recreational activities conducted at the site would remain unchanged. Similarly, the site and structures would remain without any alterations or improvements.

Effectiveness in Meeting Project Objectives: Under the No Project Alternative, most of the objectives of the project would not be met. This alternative meets only 1 of the objectives discussed in the EIR. The summary of this alternative's ability to meet the objectives is described in Table V-1.

Comparison of Effects of the Alternative to Effects of the Project: The regulatory framework and existing conditions would be the same as that described for the project. A summary comparison of this alternative to impacts of the project is presented in Table V-2. The analysis presented in the table shows that this alternative would not result in the significant impacts that would be anticipated as a result of the project.

- Aesthetics

  Tier I - Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to aesthetics. Under the No Project Alternative, potential aesthetic changes relating to the replacement of existing site features would not occur. The project site would continue in its existing form with its visual and aesthetic character unchanged. Even though the aesthetic changes resulting from the recommended project would not be considered significant impacts, the No Project Alternative's impacts to aesthetics would be less because no change, such as increased nighttime lighting, would occur. As with Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to aesthetics with the No Project Alternative, implementation of measure Aesthetics-1 specified for Tier I of the recommended project would not be required. Tier I impacts related to aesthetics would be less than significant for the No Project Alternative.

  Tier II - Unlike Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to aesthetics. Under the No Project Alternative, potential aesthetic changes relating to the replacement of existing site features would not occur. This alternative would not result in the more intensive development or the increase in nighttime lighting from vehicles, buildings, landscape features, and signage associated with commercial uses under the recommended project. As a result, the project site would continue in its existing form with its visual and aesthetic character unchanged. Even though the aesthetic changes resulting from the recommended project would not be considered significant impacts, the No Project Alternative's impacts to aesthetics would be less because no change, such as increased nighttime lighting, would occur. As with Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to aesthetics with the No Project Alternative, implementation of measures Aesthetics-1 through Aesthetics-4 specified for Tier II of the recommended project would not be required. Tier II impacts related to aesthetics would be less than significant for the No Project Alternative.

- Air Quality

  Tier I - Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to ambient air quality. The No Project Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike the recommended project, this alternative would not entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, or asphalt operations beyond the baseline conditions. The No Project Alternative would not require grading or the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of volatile organic compounds (VOCs). The No Project Alternative would not have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Unlike Tier I of the recommended project, the No Project Alternative would avoid potential significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the recommended project site by employees and visitors that would need mitigation measures to be reduced to less than significant levels. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to ambient air quality with the No Project Alternative, implementation of measures Air-1 through Air-11 would not be required. Tier I impacts related to air quality would be less than significant for the No Project Alternative.

  Tier II - Unlike Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to ambient air quality. The No Project Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike the recommended project, this alternative would not entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, or asphalt operations beyond the baseline conditions. The No Project Alternative would not require grading or the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. The No Project Alternative would not have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Implementation of Tier II the recommended project would be expected to result in cumulative construction-related impacts and impacts during operation that would remain above the level of significance with the incorporation of mitigation measures. Unlike Tier II of the recommended project, the No Project Alternative would avoid potential significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the recommended project site by employees and visitors. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no

impacts to ambient air quality with the No Project Alternative, implementation of measures Air-1 through Air-11 would not be required. Tier II impacts related to air quality would be less than significant for the No Project Alternative.

- Cultural Resources

  Tier I -Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to cultural resources. The No Project Alternative would avoid the construction-related and redevelopment impacts to cultural resources that would occur as a result of the recommended project. Unlike Tier I of the recommended project, the No Project Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would not occur. As a result, the project site would continue in its existing form with its cultural resources unchanged. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to cultural resources with the No Project Alternative, implementation of measures Cultural-1 through Cultural-2 specified for Tier I of the recommended project would not be required. Tier I impacts related to cultural resources would be less than significant for the No Project Alternative.

  Tier II - Unlike Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to cultural resources. The No Project Alternative would avoid the construction-related and redevelopment impacts to cultural resources that would occur as a result of the recommended project. Unlike Tier II of the recommended project, the No Project Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would not occur. As a result, the project site would continue in its existing form with its cultural resources unchanged. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to cultural resources with the No Project Alternative, implementation of Measures Cultural-1 through Cultural-5 specified for Tier II of the recommended project would not be required. Tier II impacts related to cultural resources would be less than significant for the No Project Alternative.

- Geology and Soils

  Tier I - Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to geology and soils. The No Project Alternative avoids potential impacts to geology and soils that could result from the implementation of the recommended project. This alternative would avoid short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier I of the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures, or construction of new structures and implementation of the mitigation measures would not be required. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to geology and soils with the No Project Alternative, implementation of measures Geology-1 through Geology-3 specified for Tier I of the recommended project would not be required. Tier I impacts related to geology and soils would be less than significant for the No Project Alternative.

Tier II - Unlike Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to geology and soils. The No Project Alternative avoids potential impacts to geology and soils that could result from the implementation of the recommended project. This alternative would avoid short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier II of the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures, or construction of new structures and implementation of the mitigation measures would not be required. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to geology and soils with the No Project Alternative, implementation of measures Geology-1 through Geology-3 specified for Tier II of the recommended project would not be required. Tier II impacts related to geology and soils would be less than significant for the No Project Alternative.

- Greenhouse Gas Emissions

Tier I - Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to greenhouse gas (GHG) emissions. The No Project Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike Tier I of the recommended project, this alternative would not entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, or electricity consumption beyond the baseline conditions. The No Project Alternative would not require the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to GHG emissions. Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to GHG emissions with the No Project Alternative, implementation of measure GHG-1 would not be required. Tier I impacts related to greenhouse gas emissions would be less than significant for the No Project Alternative.

Tier II - Unlike Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to GHG emissions. The No Project Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike Tier II of the recommended project, this alternative would not entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, or electricity consumption beyond the baseline conditions. The No Project Alternative would not require the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to GHG emissions. Unlike Tier II of the recommended project, the No Project Alternative would not have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would not conflict with any applicable plan, policy, or regulation of an agency

adopted for the purpose of reducing the emissions of GHGs. Potential GHG emission impacts associated with construction and operation of Tier II would remain as significant and unavoidable even with the incorporation of mitigation measures. Unlike Tier II of the recommended project, the No Project Alternative would avoid potential significant impacts to GHG emissions that would result from emissions from construction equipment, electricity consumption, and the anticipated increase in vehicle miles traveled to the recommended project site by employees and visitors. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to GHG emissions with the No Project Alternative, implementation of measure GHG-1 would not be required. Tier II impacts related to greenhouse gas emissions would be less than significant for the No Project Alternative.

- Hazards and Hazardous Materials

  Tier I - Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The No Project Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the recommended project. Unlike Tier I of the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6, *Hazards and Hazardous Materials*, would not be required. Potential operational impacts from hazards or hazardous materials would not occur. The No Project Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hazards and hazardous materials with the No Project Alternative, implementation of measures Hazards-1 through Hazards-5 specified for Tier I of the recommended project would not be required. Tier I impacts related to hazards and hazardous materials would be less than significant for the No Project Alternative.

  Tier II - Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The No Project Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the recommended project. Unlike Tier I of the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6 would not be required. Potential operational impacts from hazards or hazardous materials would not occur. The No Project Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hazards and hazardous materials with the No Project Alternative, implementation of Measures Hazards-1 through Hazards-5 specified for Tier I of the recommended project would not be required. Tier II impacts related to hazards and hazardous materials would be less than significant for the No Project Alternative.

- Hydrology and Water Quality

  Tier I - Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to hydrology and water quality. The No Project Alternative avoids impacts to hydrology and water quality that could result from the implementation of the recommended project. Section 3.7, *Hydrology and Water Quality*, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier I of the recommended project, the No Project Alternative would entail no conversion of vacant land including grading, paving, and construction, and implementation of the mitigation measures would not be required. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hydrology and water quality with the No Project Alternative, implementation of measures Hydrology-1 through Hydrology-3 and Hazards-1 specified for Tier I of the recommended project would not be required. Tier I impacts related to hydrology and water quality would be less than significant for the No Project Alternative.

  Tier II - Unlike Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to hydrology and water quality. The No Project Alternative avoids impacts to hydrology and water quality that could result from the implementation of the recommended project. Section 3.7 of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier II of the recommended project, the No Project Alternative would entail no conversion of vacant land including grading, paving, and construction, and implementation of the mitigation measures would not be required. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hydrology and water quality with the No Project Alternative, implementation of measures Hydrology-1 through Hydrology-4 and Hazards-1 specified for Tier II of the recommended project would not be required. Tier II impacts related to hydrology and water quality would be less than significant for the No Project Alternative.

- Noise

  Tier I - Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to noise. The No Project Alternative would not entail for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Section 3.8, *Noise*, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier I of the recommended project, the No Project Alternative would not result in impacts related to noise and no mitigation measures would be required. The No Project Alternative would not result in short- or long-term impacts to noise. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to noise with the No Project Alternative, implementation of measures Noise-1 through Noise-3 specified for Tier I the

recommended project would not be required. Tier I impacts related to noise would be less than significant for the No Project Alternative.

Tier II - Unlike Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to noise. The No Project Alternative would not entail for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Section 3.8 of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier II of the recommended project, the No Project Alternative would not result in impacts related to noise and no mitigation measures would be required. The No Project Alternative would not result in short- or long-term impacts to noise. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to noise with the No Project Alternative, implementation of measures Noise-1 through Noise-4 specified for Tier II the recommended project would not be required. Tier II impacts related to noise would be less than significant for the No Project Alternative.

- Population and Housing

Tier I - As with Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to population and housing. The No Project Alternative would not assist in meeting regional housing and employment goals. Under the No Project Alternative, potential changes related to population and housing would not occur. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the recommended project, there would be no impacts to population and housing with the No Project Alternative, and no mitigation measures would be required. Tier I impacts related to population and housing would be less than significant for the No Project Alternative.

Tier II - As with Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to population and housing. The No Project Alternative would not assist in meeting regional housing and employment goals. Under the No Project Alternative, potential changes related to population and housing would not occur. This alternative would not result in any residential development or more intensive development associated with the medical, commercial or retail uses under the recommended project. Although potential impacts resulting from Tier II of the recommended project would not be considered significant impacts. The No Project Alternative's impacts to population and housing would be less than the recommended project because no change, such as the 100 unit residential component, would be implemented. However, the No Project Alternative would not contribute to the regional housing goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to population and housing with the No Project Alternative, and no mitigation measures would be required. Tier II impacts related to population and housing would be less than significant for the No Project Alternative.

- Public Services

  Tier I - As with Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to public services. The No Project Alternative would not result in the need for additional fire protection, police protection, schools, parks, and other public services. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the recommended project, there would be no impacts to public services with the No Project Alternative, and no mitigation measures would be required. Tier I impacts related to public services would be less than significant for the No Project Alternative.

  Tier II - As with Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to public services. The No Project Alternative would not result in the need for additional fire protection, police protection, schools, parks, and other public services. Section 3.10, *Public Services*, of this EIR provides a discussion of the potential impact to public services related to Tier II of the recommended project. Like Tier II of the recommended project, the No Project Alternative would not create a significant net increase in public services and would require the implementation of the mitigation measures. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to public services with the No Project Alternative, and no mitigation measures would be required. Tier II impacts related to public services would be less than significant for the No Project Alternative.

- Recreation

  Tier I - As with Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to recreation. The No Project Alternative would not result in impacts to parks and recreational facilities. The No Project Alternative would also not create an additional demand for the County's parks. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the recommended project, there would be no impacts to recreation with the No Project Alternative, and no mitigation measures would be required. Tier I impacts related to recreation would be less than significant for the No Project Alternative.

  Tier II - As with Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to recreation. The No Project Alternative would not result in impacts to parks and recreational facilities. The No Project Alternative would also not create an additional demand for the County's parks. Tier II of the recommended project would not result in significant impacts to existing parks or recreational facilities given the limited number of residential units recommended under Tier II and the availability and location of existing recreational facilities. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to recreation with the No Project Alternative, and no mitigation measures would be required. Tier II impacts related to recreation would be less than significant for the No Project Alternative.

- Transportation and Traffic

  Tier I - Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to transportation and traffic. The No Project Alternative avoids potential impacts to transportation and traffic that could result from the implementation of Tier I of the recommended project. The No Project Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier I of the recommended project, this alternative would create no additional transportation or circulation components and implementation of the mitigation measures would not be required. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to transportation and traffic with the No Project Alternative, implementation of measure Traffic-1 specified for Tier I of the recommended project would not be required. Tier I impacts related to transportation and traffic would be less than significant for the No Project Alternative.

  Tier II - Unlike Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to transportation and traffic. The No Project Alternative avoids potential impacts to transportation and traffic that could result from the implementation of Tier II of the recommended project. The No Project Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the recommended project. Unlike the Tier II of recommended project, this alternative would create no additional transportation or circulation components and implementation of the mitigation measures would not be required. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to transportation and traffic with the No Project Alternative, implementation of measures Traffic-1 through Traffic-3 specified for Tier II of the recommended project would not be required. Tier II impacts related to transportation and traffic would be less than significant for the No Project Alternative.

- Utilities and Service Systems

  Tier I - Unlike Tier I of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to utilities and service systems. The No Project Alternative avoids potential impacts to utilities and service systems that could result from the implementation of Tier I of the recommended project. The No Project Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Like Tier I of the recommended project, this alternative would not require mitigation however, unlike Tier I of the recommended project, this alternative would entail no additional construction of buildings and would not require additional use of existing infrastructure (i.e., sewer, water, etc.). Tier I impacts related to utilities and service systems would be less than significant for the No Project Alternative.

  Tier II - Unlike Tier II of the recommended project, the No Project Alternative would not have the potential to result in significant impacts to utilities and service systems.

The No Project Alternative avoids potential impacts to utilities and service systems that could result from the implementation of Tier II of the recommended project. The No Project Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the recommended project. Unlike the recommended project, this alternative would entail no additional construction of buildings and would not require additional use of existing infrastructure (i.e., sewer, water, etc.). With the No Project Alternative, mitigation measures would not be required. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to utilities and service systems with the No Project Alternative, implementation of Measures Utilities-1 through Utilitites-2 specified for Tier II of the recommended project would not be required. Tier II impacts related to utilities and service systems would be less than significant for the No Project Alternative.

Feasibility: This alternative is considered infeasible.

Facts: The above feasibility finding is based on the following:

- The No Project Alternative would only meet one of the project objectives.
- The No Project Alternative would not improve the hospital, create a mixed use development or create additional jobs.
- The No Project Alternative would present no improvements to the baseline existing conditions.
- The No Project Alternative would not address the existing need for quality health care in the County and would not be a feasible alternative

V.B ALTERNATIVE 1: REDUCED PROJECT SIZE ALTERNATIVE (900,000-SQUARE-FOOT TIER II)

Description of Alternative: Under the Reduced Project Size Alternative would vary from the recommended project in its development of Tier II, although the Tier I components would be the same as those associated with the recommended project. Under this alternative, there would still be a campus-wide master plan and the respective improvements, the buildings that were identified as being replaced, removed, or reused in the recommended project would be the same; however the potential build-out for this alternative would be less than half of the development that would be included in the recommended project. This alternative would entail a maximum potential build-out of 900,000 square feet in its Tier II component.

Effectiveness in Meeting Project Objectives: Under the Reduced Project Size Alternative would meet most of the objectives of the project. As with the recommended project, objectives 1-12 and 14 would be met; however, this alternative would not meet objective 13 described in Table V-1.

Comparison of Effects of the Alternative to Effects of the Project: The regulatory framework and existing conditions would be the same as that described for the project. A summary comparison of this alternative to impacts of the project is presented in Table V-2. The analysis presented in the table shows that this alternative would still result in some of the significant impacts that would be anticipated as a result of the project.

- Aesthetics

  Tier I - As with Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to aesthetics. The Reduced Project Size Alternative for Tier II, this alternative reduces impacts to aesthetics that could result from the implementation of the recommended project. This alternative would have the same visual character (i.e., building design, etc.) as Tier I of the recommended project. Thus, the Reduced Project Size Alternative would result in similar aesthetic impacts as Tier I of the recommended project. This alternative would not substantially degrade the visual character of the site and its surroundings but would still require mitigation for light and glare and shade and shadow. Impacts would be less than significant with mitigation incorporated. This alternative is considered to have the same Tier I visual impacts as compared to the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to aesthetics with the Reduced Project Size Alternative, it is expected that implementation of measures Aesthetics-1 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to aesthetics. The Reduced Project Size Alternative for Tier II reduces impacts to aesthetics that could result from the implementation of the recommended project. This alternative would not result in the long-term operation impacts that would occur as a result of the recommended project because it would not entail as much development or expansion as the recommended project. This alternative would generally have a similar visual character (i.e., building design, etc.) as the recommended project but would reduce the building square footage associated with Tier II. Thus, the Reduced Project Size Alternative would result in similar aesthetic impacts as the recommended project but to a lesser degree. This alternative would not substantially degrade the visual character of the site and its surroundings but would still require mitigation for light and glare and shade and shadow. Impacts would be less than significant with mitigation incorporated. This alternative is considered to have reduced visual impacts as compared to the recommended project given the reduction in development. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to aesthetics with the Reduced Project Size Alternative, it is expected that implementation of measures Aesthetics-1 through Aesthetics-4 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Air Quality

  Tier I - As with Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Reduced Project Size Alternative would require the same Tier I elements, the Reduced Project Size Alternative is considered to have comparable impacts to air quality compared with Tier I of the recommended project. As with the recommended project, the Reduced Project Size Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with Tier I of the recommended project, this alternative would entail demolition of

existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, and asphalt operations beyond the baseline conditions. The Reduced Project Size Alternative would require grading and the use of construction equipment, thus resulting in potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. As with Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. As with the Tier I recommended project, the Reduced Project Size Alternative would result in potentially significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the recommended project site by employees and visitors. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Reduced Project Size Alternative, it is expected that implementation of measures Air-1 through Air-11 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II - As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Reduced Project Size Alternative would require less construction and less vehicle trips than Tier II of the recommended project, the Reduced Project Size Alternative is considered to have lesser impacts to air quality compared with Tier II of the recommended project. However, as with Tier II of the recommended project, the Reduced Project Size Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with Tier II of the recommended project, this alternative would entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, and asphalt operations beyond the baseline conditions. The Reduced Project Size Alternative would require grading and the use of construction equipment, thus resulting in potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. As with the recommended project, the Reduced Project Size Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. As with Tier II of the recommended project, the Reduced Project Size Alternative would result in potentially significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the recommended project site by employees and visitors. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Reduced Project Size Alternative, it is expected that implementation of measures Air-1 through Air-11 specified for the recommended project would be required to reduce the anticipated impacts to the maximum extent feasible, although as with the recommended project, impacts would be significant and unavoidable.

- Cultural Resources

  Tier I - As with Tier I the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to cultural resources. This alternative would result in reduced impacts to paleontological resources, archeological resources, and human remains and similar impacts to historical resources that would result from the implementation of the recommended project. Under this alternative, the scale and scope of construction-related activities would be consistent with Tier I development and would result in the reduced potential to encounter paleontological resources, archeological resources, and human remains because there would be less construction related activity such as grading or ground disturbance that typically result in these impacts. Therefore, the Reduced Project Size Alternative would be anticipated to have fewer potential impacts to paleontological resources, archeological resources, and human remains. However, the buildings that were identified as being vacated in Tier I of the recommended project would remain the same. This alternative would still require mitigation for redevelopment impacts to reduce impacts. Like Tier I of the recommended project, this alternative would have the potential to result in cumulatively considerable impacts. Since there would be potential impacts to cultural resources with the Reduced Project Size Alternative, it is expected that implementation of measures Cultural-1 through Cultural-2 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to cultural resources. This alternative would result in reduced impacts to paleontological resources, archeological resources, and human remains and similar impacts to historical resources that would result from the implementation of Tier II of the recommended project. Under this alternative, the reduced scale and scope of construction-related activities would result in the reduced potential to encounter paleontological resources, archeological resources, and human remains. Therefore, the Reduced Project Size Alternative would be anticipated to have fewer potential impacts to paleontological resources, archeological resources, and human remains. However, the buildings that were identified as being replaced, reused, or removed in Tier II of the recommended project would remain the same, resulting in similar impacts to historical resources as the recommended project. This alternative would still require mitigation for redevelopment impacts to reduce impacts to the maximum extent feasible. Impacts to historical resources would remain a significant adverse impact. Like Tier II of the recommended project, this alternative would have the potential to result in cumulatively considerable impacts. Since there would be potential impacts to cultural resources with the Reduced Project Size Alternative, it is expected that implementation of measures Cultural-1 through Cultural-5 specified for Tier II of the recommended project would be required to reduce the anticipated impacts to the maximum extent feasible, although as with the recommended project, impacts would be significant and unavoidable.

- Geology and Soils

  Tier I - As with Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to geology and

soils. The Reduced Project Size Alternative would result in comparable impacts to geology and soils that could result from the implementation of Tier I of the recommended project. This alternative would entail the same amount of grading (excavation and fill), modification of existing structures, or construction of new structures. The Reduced Project Size Alternative would be comparable to Tier I of the recommended project when considering only potential impacts to geology and soils. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to geology and soils with the Reduced Project Size Alternative, it is expected that implementation of measures Geology-1 through Geology-3 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II - As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to geology and soils. The Reduced Project Size Alternative would result in fewer potential impacts to geology and soils that could result from the implementation Tier II of the recommended project. Unlike Tier II of the recommended project, this alternative would entail less grading (excavation and fill), modification of existing structures, or construction of new structures. The implementation of the mitigation measures would be required to a lesser extent. The Reduced Project Size Alternative would be preferable to Tier II of the recommended project when considering only potential impacts to geology and soils. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to geology and soils with the Reduced Project Size Alternative, it is expected that implementation of measures Geology-1 through Geology-3 specified for Tier II the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Greenhouse Gas Emissions

  Tier I - As with Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to greenhouse gas emissions. Due to the fact that the Reduced Project Size Alternative would require comparable construction, electricity consumption, and vehicle trips as Tier I of the recommended project, the Reduced Project Size Alternative is considered to have comparable impacts to GHG emissions compared with Tier I of the recommended project. As with Tier I of the recommended project, the Reduced Project Size Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with Tier I of the recommended project, this alternative would entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, and electricity consumption beyond the baseline conditions. As with Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As with Tier I of the recommended project, the Reduced Project Size Alternative would result in potentially significant impacts to GHG emissions that would result from emissions from construction equipment, electricity consumption, and the anticipated increase in vehicle miles

traveled to the recommended project site by employees and visitors. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to GHG emissions with the Reduced Project Size Alternative, it is anticipated that implementation of mitigation measure GHG-1 would be required to reduce the anticipated impacts to the maximum extent feasible, although as with the recommended project, impacts would be significant and unavoidable.

Tier II -As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to greenhouse gas emissions. Due to the fact that the Reduced Project Size Alternative would require less construction, less electricity consumption, and less vehicle trips than the recommended project, the Reduced Project Size Alternative is considered to have lesser impacts to GHG emissions compared with Tier II of the recommended project. However, as with Tier II of the recommended project, the Reduced Project Size Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with the Tier II of the recommended project, this alternative would entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, and electricity consumption beyond the baseline conditions. As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As with Tier II of the recommended project, the Reduced Project Size Alternative would result in potentially significant impacts to GHG emissions that would result from emissions from construction equipment, electricity consumption, and the anticipated increase in vehicle miles traveled to the recommended project site by employees and visitors. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to GHG emissions with the Reduced Project Size Alternative, it is anticipated that implementation of mitigation measure GHG-1 would be required to reduce the anticipated impacts to the maximum extent feasible, although as with the recommended project, impacts would be significant and unavoidable.

- Hazards and Hazardous Materials

  Tier I - As with Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to hazards and hazardous materials. The Reduced Project Size Alternative would result in comparable potential impacts to hazards and hazardous materials that could result from the implementation of Tier I of the recommended project. Like Tier I of the recommended project, this alternative would entail less grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the same mitigation measures identified for the recommended project would be required. Potential operational impacts from hazards or hazardous materials would be comparable to Tier I of the recommended project. The Reduced Project Size Alternative would result in both short- and long-term impacts from hazards and hazardous materials. Like Tier I of

the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hazards and hazardous materials with the Reduced Project Size Alternative, it is expected that implementation of measures Hazards-1 through Hazards-5 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II - As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to hazards and hazardous materials. The Reduced Project Size Alternative would result in fewer potential impacts to hazards and hazardous materials that could result from the implementation of Tier II of the recommended project. Unlike Tier II of the recommended project, this alternative would entail less grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the mitigation measures would be required, but not to the extent that would be required for implementation of the recommended project. Potential operational impacts from hazards or hazardous materials would be less than Tier II of the recommended project. The Reduced Project Size Alternative would result in less short- or long-term impacts from hazards and hazardous materials. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hazards and hazardous materials with the Reduced Project Size Alternative, it is expected that implementation of measures Hazards-1 through Hazards-5 specified for Tier II of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Hydrology and Water Quality

  Tier I - As with Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to hydrology and water quality. Due to the fact that the Reduced Project Size Alternative would require the same construction as Tier I, the Reduced Project Size Alternative would result in the same potential impacts to hydrology that could result from the implementation of Tier I of the recommended project. Under this Alternative, the scale and scope of construction-related activities would entail comparable grading (excavation and fill), therefore the potential impact to surface water quality from erosion and runoff into storm drain systems would be the same. As with Tier I of the recommended project the potential for construction related or accidental releases of petroleum products and other hazardous substances that could result in contamination of surface water through transport of pollutants into the storm drain system. This alternative would still require all of the hydrology mitigation measures that for are required for Tier I of the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the Reduced Project Size Alternative, it is expected that implementation of measures Hydrology-1 through Hydrology-3 and Hazards-1 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - As with Tier II the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to hydrology and water

quality. Due to the fact that the Reduced Project Size Alternative would require less construction, the Reduced Project Size Alternative would result in fewer potential impacts to hydrology that could result from the implementation of Tier II of the recommended project. Under this Alternative, the reduced scale and scope of construction-related activities in Tier II would entail less grading (excavation and fill), therefore the potential impact to surface water quality from erosion and runoff into storm drain systems would be less. A smaller project scale would also reduce the potential for construction related or accidental releases of petroleum products and other hazardous substances that could result in contamination of surface water through transport of pollutants into the storm drain system. This alternative would still require all of the hydrology mitigation measures that for are required for Tier II of the recommended project. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the Reduced Project Size Alternative, it is expected that implementation of measures Hydrology-1 through Hydrology-4 and Hazards-1 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Noise

  Tier I - As with Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to noise. Due to the fact that the Reduced Project Size Alternative would require the same construction and vehicle trips as Tier I of the recommended project, the Reduced Project Size Alternative is considered to have comparable impacts to noise compared with Tier I of the recommended project. In addition, the Reduced Project Size Alternative would have construction related activities that would be comparable to Tier I of the recommended project. As with Tier I of the recommended project, the Reduced Project Size Alternative would require grading and the use of construction equipment, thus resulting in potentially significant impacts related to noise. The Reduced Size Alternative would have construction related impacts to noise that would be comparable to Tier I of the recommended project. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to noise with the Reduced Project Size Alternative, it is expected that implementation of measures Noise-1 through Noise-3 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to the maximum extent feasible, although as with the recommended project, impacts would be significant and unavoidable.

  Tier II - As with Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to noise. Due to the fact that the Reduced Project Size Alternative would require less construction and less vehicle trips than Tier II of the recommended project, the Reduced Project Size Alternative is considered to have lesser impacts to noise compared with Tier II of the recommended project. However, the Reduced Project Size Alternative would have construction related activities that would be comparable to Tier II of the recommended project. As with Tier II of the recommended project, the Reduced Project Size Alternative would require grading and the use of construction equipment, thus resulting in potentially significant impacts related to noise. The Reduced Size Alternative would have construction related impacts to noise that would be less than

with Tier II of the recommended project. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to noise with the Reduced Project Size Alternative, it is expected that implementation of measures Noise-1 through Noise-4 specified for Tier II of the recommended project would be required to reduce the anticipated impacts to the maximum extent feasible, although as with the recommended project, impacts would be significant and unavoidable.

- Population and Housing

  Tier I - As with Tier I of the recommended project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to population and housing. This alternative would generally have a similar population, housing and or growth impact as Tier I of the recommended project. Thus, the Reduced Project Size Alternative would result in similar population and housing impacts as Tier I of the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the recommended project, there would be no impacts to population and housing with the Reduced Project Size Alternative, and no mitigation measures would be required and Tier I impacts related to population and housing would be less than significant.

  Tier II - As with Tier II of the recommended project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to population and housing. This alternative would generally have a similar population, housing and or growth impacts as Tier II of the recommended project but would reduce the building square footage associated with Tier II. As with the recommended project, this alternative would not cause or contribute to a significant growth in population in this area. Thus, the Reduced Project Size Alternative would result in similar population and housing impacts as Tier II of the recommended project but to a lesser degree. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to population and housing with the Reduced Project Size Alternative, and no mitigation measures would be required and Tier II impacts related to population and housing would be less than significant.

- Public Services

  Tier I - As with Tier I of the recommended project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to public services. As with Tier I of the recommended project, the Reduced Project Size Alternative would not be expected to result in significant impacts to fire protection, police protection, parks, schools, and other public services as Tier I of the recommended project due to increased need for public services. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the recommended project, there would be no impacts to public services with the Reduced Project Size Alternative, and no mitigation measures would be required and Tier I impacts related to public services would be less than significant.

Tier II - As with Tier II of the recommended project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to public services. As with Tier II of the recommended project, the Reduced Project Size Alternative would not be expected to result in significant impacts to fire protection, police protection, parks, schools, and other public services as Tier II of the recommended project due to increased need for public services. This alternative however, would reduce the development in Tier II and as such would have less development and less of a potential to result in impacts to public services than the implementation of the recommended project. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to public services with the Reduced Project Size Alternative, and no mitigation measures would be required and Tier II impacts related to public services would be less than significant.

- Recreation

  Tier I - As with Tier I of the recommended project, the Reduced Project Size Alternative would not have the potential to result in the same development as Tier I of the recommended project. As with Tier I of the recommended project, the Reduced Project Size Alternative would not be expected to result in increased use of the County's park and recreational facilities. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the recommended project, there would be no impacts to recreation with the Reduced Project Size Alternative, and no mitigation measures would be required and Tier I impacts related to recreation would be less than significant.

  Tier II - As with Tier II of the recommended project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to recreation. The Reduced Project Size Alternative would result in a less development than Tier II of the recommended project, which would result in less of a potential for recreational impacts. However, as with Tier II of the recommended project, the Reduced Project Size Alternative would not be expected to result in increased use of the County's park and recreational facilities. Overall, because the Reduced Project Size Alternative would not include as many residential units constructed as Tier II of the recommended project, but as with Tier II of the recommended project, no mitigation measures would be required. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the Tier II of the recommended project, there would be no impacts to recreation with the Reduced Project Size Alternative, and no mitigation measures would be required and Tier II impacts related to recreation would be less than significant.

- Transportation and Traffic

  Tier I - Like Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to transportation and traffic. The Reduced Project Size Alternative would result in a similar development scenario as Tier I of the recommended project. As with Tier I of the recommended project, this alternative would most likely need to implement mitigation measures to further reduce impacts of project-generated traffic. This alternative would overall result in comparable to increased traffic generation as Tier I of the recommended project. As with the

recommended project, Tier I would result in a reduction of trips. Tier I would result in 2,586 daily trips of which 176 trips would occur in the morning peak hour and 179 trips would occur in the evening peak hour. Since Tier I also involves vacating existing uses, a net reduction in trips of approximately 4,905 daily trips, 332 AM trips, and 338 PM trips would occur. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to transportation and traffic with the Reduced Project Size Alternative, it is expected that implementation of measure Traffic-1 specified for Tier I the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II - Like Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to transportation and traffic. The Reduced Project Size Alternative would result in a smaller development scenario than Tier II the recommended project, which would result in fewer overall traffic impacts. The weekday trip generation forecast for this alternative is expected to generate less of a net increase in vehicle trips. However, this alternative would most likely need to implement mitigation measures to further reduce impacts of project-generated traffic. This alternative would overall result in fewer impacts related to increased traffic generation than Tier II of the recommended project. The Tier II component trip generation for this alternative would result in a net total of approximately 11,909 daily trips of which 745 trips would occur during the morning peak hour and 1,048 trips during the evening peak hour. The recommended project (Tiers I and II combined) would have a total net trip generation of 7,004 daily trips of which 413 trips would occur during the morning peak hour and 710 trips during the evening peak hour. This represents 64% less daily trips than the recommended project and 67% and 59% less trips during the AM and PM peak hours, respectively. Similar to the recommended project, the Reduced Project Size Alternative would have the potential to result in significant traffic impacts. However, this alternative would adversely impact traffic to a lesser degree, based on the 67% less trip generation than the Recommended Project. No significant differences in travel patterns outside the project area would be expected between this alternative and that of the recommended project. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to transportation and traffic with the Reduced Project Size Alternative, it is expected that implementation of measures Traffic-1 through Traffic-3 specified for Tier II of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Utilities and Service Systems

  Tier I - Like Tier I of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to utilities and services systems. The Reduced Project Size Alternative would still result in substantially more development than currently exists at the project site although as with Tier I there would not be a small increase in the population. Due to the fact that the total development under this alternative is comparable to that of Tier I of the recommended project, this alternative would result in a reduction in the demand on water supply, wastewater treatment facilities, landfills and recycling requirements. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable

impacts. Since there would be potential impacts to utilities and service systems with the Reduced Project Size Alternative, it is expected that like Tier I of the recommended project, no mitigation would be required and Tier I impacts related to utilities and service systems would be less than significant.

Tier II - Like Tier II of the recommended project, the Reduced Project Size Alternative would have the potential to result in significant impacts to utilities and services systems. The Reduced Project Size Alternative would still result in substantially more development than currently exists at the project site and would still result a small increase in the population. Therefore the Reduced Project Size Alternative would also increase demand on water supply, wastewater treatment, solid waste or other utilities within the project area. However, because the total development under this alternative is reduced compared to that of Tier II of the recommended project, this alternative would result in less demand on water supply, wastewater treatment facilities, landfills and recycling requirements. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to utilities and service systems with the Reduced Project Size Alternative, it is expected that implementation of Measures Utilitites-1 through Utilitites-2 specified for Tier II of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Feasibility: This alternative is feasible. This alternative would be feasible but it would require a reduced scale, scope, and limited site configurations that may not fully include all of the mixed use components described in the recommended project.

Facts: The above feasibility finding is based on the following:

- As with the recommended project, objectives 1-12 and 14 would be met; however, this alternative would not meet objective 13.
- The master campus plan development would be limited to less than half of the potential development that is being considered at the recommended project site; however, the maximum daily construction activity would likely be similar to the recommended project scenario.
- The Reduced Site Alternative would not be capable of reducing all the significant impacts that would result from the project to below the level of significance.

V.C ALTERNATIVE 2: RE-OPENING THE EXISTING MACC ALTERNATIVE

Description of Alternative: As with the recommended project, the Re-opening the existing MACC Alternative would be located on the existing campus. This alternative would restore the former outpatient and inpatient (i.e. the trauma center, emergency services, and at least 233 beds) functions of the MACC building within the existing MACC building. Under this alternative, it is anticipated that Tier I of the recommended project (development of the new MACC and Ancillary buildings) would not occur. In addition, no community-based, comprehensive, or mixed use development as described in Tier II, master plan development of the recommended project would occur. There would be no new development.

Effectiveness in Meeting Project Objectives: the Re-opening the Existing MACC Alternative would be capable of meeting only one of the objectives identified by the County, objective 6. The existing

MACC is operationally and environmentally inefficient. The County's efforts and funding would all contribute to the seismic upgrades, inpatient improvements, and operations at the existing MACC.

Comparison of Effects of the Alternative to Effects of the Project: The regulatory framework and existing conditions would be the same as that described for the project. A summary comparison of this alternative to impacts of the project is presented in Table V-2. The analysis presented in the table shows that this alternative would still result in some of the significant impacts that would be anticipated as a result of the project.

- Aesthetics

  Tier I - Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to aesthetics. Under this alternative, it is anticipated that Tier I and the visual appearance of the recommended project area would essentially look like it does under existing conditions. This alternative would slightly reduce visual impacts as it relates to the MACC building (i.e., two less buildings would need to be constructed). The Re-opening of the Existing MACC Alternative would still result in an increase in nighttime lighting from vehicles, buildings, landscape features, and signage associated with medical, residential commercial uses under the recommended project Tier II. This alternative is considered to have slightly reduced visual impacts as compared to Tier I of the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to aesthetics with the Re-opening the Existing MACC Alternative it is expected that implementation of measure Aesthetics-1 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to aesthetics. However, this alternative would reduce the visual impacts associated with the Tier II development. No Tier II development would occur. The Re-opening of the Existing MACC Alternative would still result in an increase in nighttime lighting from vehicles, buildings, landscape features, and signage associated with medical, residential commercial uses under the recommended project Tier II although they would be limited and would be comparable to impacts associated with the past operational campus. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. However, this alternative is considered to have slightly reduced visual impacts as compared to the recommended project. Since there would be potential impacts to aesthetics with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Aesthetics-1 through Aesthetics-4 specified for Tier II of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Air Quality

  Tier I - Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Re-opening the Existing MACC Alternative would require less construction and less vehicle trips than the recommended project, the Re-opening the

Existing MACC Alternative is considered to have lesser impacts to air quality compared with Tier I of the recommended project. Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would require only limited construction and site improvement activities. Unlike the recommended project, this alternative would not entail the vacation of existing structures or grading activities beyond the baseline conditions. The Re-opening the Existing MACC Alternative would require the use of a limited number of construction equipment and would generate vehicle trips, thus resulting in potentially significant impacts to air quality, particularly with regard to NO_x emissions. As with Tier I of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. However, due to the fact that no grading, excavation, or major construction activities would occur beyond the existing MACC building, it is anticipated that implementation of mitigation measures would not be required. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Re-opening the Existing MACC Alternative it is expected that implementation of Measures Air-1 through Air-11 specified for Tier I the recommended project would not be required. Impacts related to air quality would be expected to be less than significant.

Tier II - Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Tier II element of this alternative would not occur, the Re-opening the Existing MACC Alternative is considered to have the fewer impacts to air quality compared with Tier II of the recommended project. Unlike Tier II of the recommended project, this alternative would not entail reuse, removal, or replacement of existing structures or grading activities beyond the baseline conditions. The Re-opening the Existing MACC Alternative would require the use of construction equipment and would generate vehicle trips, although there would be less use of construction-related equipment and fewer vehicle trips, thus resulting in fewer potentially significant impacts to air quality, particularly with regard to NO_x emissions. As with Tier II of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. Due to the fact that no significant grading, excavation, or major construction activities would occur beyond the existing MACC, it is anticipated that implementation of mitigation measures would not be required. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Air-1 through Air-11 specified for Tier II of the recommended project would not be required. Impacts related to air quality would be expected to be less than significant.

- Cultural Resources

Tier I - Unlike Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to cultural

resources. The Re-opening the existing MACC Alternative would reduce potential impacts to cultural resources that could result from the implementation of the recommended project. Structural and tenant refinements related to the incorporation of a 500-bed hospital within the existing MACC, a historical resource, would require review for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Unlike the recommended project, this Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of historical resources would not occur. As a result, the project site would continue in its existing form with its cultural resources largely unchanged. The incorporation of structural and tenant refinements to the existing MACC, a historical resource, would require review for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to cultural resources with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Cultural-1 through Cultural-5 specified for the recommended project would not be required. Impacts related to cultural resources would be expected to be less than significant.

Tier II - Unlike Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to cultural resources. The Re-opening the existing MACC Alternative would reduce potential impacts to cultural resources that could result from the implementation of the recommended project. Structural and tenant refinements related to the incorporation of a 500-bed hospital within the existing MACC, a historical resource, would require review for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Unlike the recommended project, this Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of historical resources would not occur. As a result, the project site would continue in its existing form with its cultural resources largely unchanged. The incorporation of structural and tenant refinements to the existing MACC, a historical resource, would require review for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to cultural resources with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Cultural-1 through Cultural-5 specified for the recommended project would not be required. Impacts related to cultural resources would be expected to be less than significant.

- Geology and Soils

  Tier I - Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to geology and soils. This alternative avoids most of the potential impacts to geology and soils that could result from the implementation of the recommended project. Section 3.4,

Geology and Soils, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures, or construction of new structures and implementation of the mitigation measures would not be required. However, the anticipated seismic improvements that would be required under this alternative would be considerable and would require different mitigation than that recommended for the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to geology and soils with the Re-opening the Existing MACC Alternative it is expected that although implementation of measures Geology-1 through Geology-3 specified for the recommended project would not be required, although other mitigation measures would be required for this alternative to reduce the anticipated impacts to below the level of significance.

Tier II - Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to geology and soils. This alternative avoids most of the potential impacts to geology and soils that could result from the implementation of the recommended project. Section 3.4, *Geology and Soils*, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures, or construction of new structures and implementation of the mitigation measures would not be required. However, the anticipated seismic improvements that would be required under this alternative would be considerable and would require different mitigation than that recommended for the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to geology and soils with the Re-opening the Existing MACC Alternative it is expected that although implementation of measures Geology-1 through Geology-3 specified for the recommended project would not be required, mitigation measures specific to this alternative's impacts would be required to reduce the anticipated impacts to below the level of significance.

- Greenhouse Gas Emissions

Tier I - Unlike Tier I of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant construction related impacts to greenhouse gas emissions. Due to the fact that the Re-opening the Existing MACC Alternative would require less construction, less electricity consumption, and less vehicle trips than the recommended project, the Re-opening the Existing MACC Alternative is considered to have fewer impacts to GHG emissions compared with the recommended project. Unlike the recommended project, the Re-opening the Existing MACC Alternative would require only limited construction and site improvement activities. Unlike the recommended project, this alternative would not entail demolition of existing structures or major construction activities beyond the baseline conditions. The Re-opening the Existing MACC Alternative would require the use of a limited number of construction equipment, would generate vehicle trips, and would require electricity consumption, thus resulting in potentially significant impacts to GHG emissions. As with the recommended project, the Re-opening the Existing MACC

Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no construction of new buildings associated with the Re-opening the Existing MACC Alternative, it is anticipated that implementation of measure GHG-1 would not be required. Impacts related to greenhouse gas emissions would be expected to be less than significant.

Tier II - Unlike Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant construction related impacts to greenhouse gas emissions. Due to the fact that the Re-opening the Existing MACC Alternative would require less construction, less electricity consumption, and less vehicle trips than the recommended project, the Re-opening the Existing MACC Alternative is considered to have fewer impacts to GHG emissions compared with the recommended project. Unlike the recommended project, the Re-opening the Existing MACC Alternative would require only limited construction and site improvement activities. Unlike the recommended project, this alternative would not entail demolition of existing structures or major construction activities beyond the baseline conditions. The Re-opening the Existing MACC Alternative would require the use of a limited number of construction equipment, would generate vehicle trips, and would require electricity consumption, thus resulting in potentially significant impacts to GHG emissions. As with the recommended project, the Re-opening the Existing MACC Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no construction of new buildings associated with the Re-opening the Existing MACC Alternative, it is anticipated that implementation of measure GHG-1 would not be required. Impacts related to greenhouse gas emissions would be expected to be less than significant.

- Hazards and Hazardous Materials

Tier I - Unlike the recommended project, this alternative would not have the potential to result in impacts to hazards and hazardous materials. This alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the recommended project. Unlike the recommended project, this alternative would entail no grading (excavation and fill) or the construction of new structures. However, this alternative would entail modification of the existing MACC building that might result in impacts related to hazards and hazardous materials. The implementation of the mitigation measures identified in Section 3.6 would be required. Potential operational impacts from hazards or hazardous materials would likely occur. This alternative would not result in short- or long-term impacts from hazards and hazardous materials that would be comparable to the impacts associated with the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to hazards and hazardous materials with the Re-opening the Existing

MACC Alternative it is expected that implementation of measures Hazards-1 through Hazards-5 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II -Unlike Tier II of the recommended project, Tier II of the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The Re-opening the Existing MACC Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the recommended project. Unlike Tier II of the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6, Hazards and Hazardous Materials, would not be required. Potential operational impacts from hazards or hazardous materials would not occur. The Re-opening the Existing MACC Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hazards and hazardous materials with the Re-opening the Existing MACC Alternative, implementation of measures Hazards-1 through Hazards-5 specified for Tier II of the recommended project would not be required. Impacts related to hazards and hazardous materials would be expected to be less than significant.

- Hydrology and Water Quality

  Tier I -Like the recommended project, this alternative would have the potential to result in impacts to hydrology and water quality. Because there are no grading or fill activities, the implementation of the mitigation measures identified in Section 3.7 to reduce impacts from pollution entering the storm drain system would not be required. However, under the recommended project, the new MACC building would be an efficient and sustainable building, however this alternative would not include development of the sustainable or efficient elements that would reduce runoff and potential water quality–related impacts. The existing MACC as it currently operates is inefficient. Like the recommended project, this alternative would require the implementation of mitigation measures; however, efforts to re-open and expand the existing MACC would be expected to result in impacts to hydrology and water quality that would be greater than the recommended project. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the Re-opening the Existing MACC Alternative it is expected that implementation of Measures Hydrology-1 through Hydrology-4, specified for the recommended project would be required. However, it is anticipated that Hazards-1 specified for Tier I of the recommended project would not be required. Impacts related to hydrology and water quality would be expected to be less than significant.

  Tier II - Like Tier II of the recommended project, Tier II of the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to hydrology and water quality. The Re-opening the Existing MACC Alternative avoids impacts to hydrology and water quality that could result from the implementation of the recommended project. Section 3.7 of this EIR provides mitigation for short- and

long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier II of the recommended project, the Re-opening the Existing MACC Alternative would entail no conversion of vacant land including grading, paving, and construction; however, the existing MACC is inefficient and seismic improvements to this structure would not improve the efficiency or reduce the water use of this building, nor would the improvements entail LEED or energy-efficient elements, and implementation of mitigation measures would be required. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be impacts to hydrology and water quality with the Re-opening the Existing MACC Alternative, implementation of measures Hydrology-1 through Hydrology-4 specified for Tier II of the recommended project would be required. However, it is anticipated that Hazards-1 specified for Tier II of the recommended project would not be required. Impacts related to hydrology and water quality would be expected to be less than significant.

- Noise

  Tier I - Unlike the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to noise. Under this alternative, the construction-related noise impacts would not occur. Both Tier I and Tier II related noise impacts would be avoided. Unlike the recommended project, this alternative would not be expected to result in noise-related construction impacts. As such, this alternative would be expected to result in fewer impacts associated with construction-related noise impacts than with the recommended project. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to noise with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Noise-1 through Noise-4 specified for the recommended project would not be required. Impacts related to noise would be expected to be less than significant.

  Tier II - Unlike Tier II of the recommended project, Tier II of the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to noise. The Re-opening the Existing MACC Alternative would not entail for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Section 3.8, Noise, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not result in impacts related to noise and no mitigation measures would be required. The Re-opening the Existing MACC Alternative would not result in short- or long-term impacts to noise. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to noise with the Re-opening the Existing MACC Alternative, implementation of Measures Noise-1 through Noise-4 specified for Tier II the recommended project would not be required. Impacts related to noise would be expected to be less than significant.

- Population and Housing

  Tier I - Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to population

and housing. As with Tier I of the recommended project, there would be no anticipated impacts related to population and housing with this alternative. Under this alternative, the recommended residential units would still be constructed. Under this alternative, the up to 100 residential units would still be constructed as a part of Tier II. The Re-opening of the MACC Alternative would not be expected to significantly impact the population or housing in the recommended project area. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the recommended project, there would be no impacts to population and housing with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required. Impacts related to population and housing would be expected to be less than significant.

Tier II - Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to population and housing. As with Tier II of the recommended project, there would be no anticipated impacts related to population and housing with this alternative. Under this alternative, the recommended residential units would still be constructed. Under this alternative, the up to 100 residential units would still be constructed as a part of Tier II. The Re-opening of the MACC Alternative would not be expected to significantly impact the population or housing in the recommended project area. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to population and housing with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required. Impacts related to population and housing would be expected to be less than significant.

- Public Services

Tier I - Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to public services. The Re-opening of the Existing MACC Alternative would result in similar impacts to public services as compared to the recommended project. The Re-opening of the Existing MACC Alternative would have no impacts to fire protection, police protection, parks, schools, and other public services like the recommended project. As the recommended project the residential units would be included and impacts to public services are less than significant. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to public services with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required. Impacts related to public services would be expected to be less than significant.

Tier II - Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to public services. The Re-opening of the Existing MACC Alternative would result in similar impacts to public services as compared to the recommended project. The Re-opening of the Existing MACC Alternative would have no impacts to fire protection, police protection, parks, schools, and other public services like the recommended project. As the recommended project the residential units would be included and impacts to public services are less than significant. Like Tier II of the recommended project, this

alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to public services with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required. Impacts related to public services would be expected to be less than significant.

- Recreation

  Tier I - Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to recreation. Under this alternative, the recommended residential units would still be constructed. The Re-opening the Existing MACC Alternative would still allow for the residential units to be constructed as a part of Tier II. As with Tier II of the recommended project, this alternative would not be expected to result in increased use of the County's park and recreational facilities. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to recreation with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required. Impacts related to recreation would be expected to be less than significant.

  Tier II - Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to recreation. Under this alternative, the recommended residential units would still be constructed. The Re-opening the Existing MACC Alternative would still allow for the residential units to be constructed as a part of Tier II. As with Tier II of the recommended project, this alternative would not be expected to result in increased use of the County's park and recreational facilities. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to recreation with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required. Impacts related to recreation would be expected to be less than significant.

- Transportation and Traffic

  Tier I - Like Tier I of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to transportation and traffic. The Re-opening the Existing MACC Alternative would result in a comparable amount of trips associated within the Tier I of the recommended project. The amount of trips and impacts associated with the construction of this alternative would be comparable to those associated Tier I of the recommended project. The Re-opening the Existing MACC Alternative would overall result in impacts that are comparable to the recommended project and would require mitigation measures. This alternative would contain no new development and therefore would not generate any new trips. This alternative would generate fewer trips than the existing baseline conditions. The existing baseline trip generation includes both operational and non-operational existing uses, which includes the existing MACC building. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to transportation and traffic with the Re-opening the Existing MACC Alternative it is expected that implementation of

Measure Traffic-1 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II - Like Tier II of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to transportation and traffic. The Re-opening the Existing MACC Alternative would not result in a comparable amount of trips associated within the Tier II of the recommended project. Under this alternative, none of the development recommended under Tier II of the recommended project would be built. The amount of trips and impacts associated with this alternative would not be comparable to those associated the Tier II of the recommended project. The Re-opening the Existing MACC Alternative would overall result in impacts less than those of Tier II of the recommended project and would not require mitigation measures. This alternative would contain no new development and therefore, would not generate any new trips. This alternative would generate fewer trips than the existing baseline conditions. The existing baseline trip generation includes both operational and non-operational existing uses, which includes the existing MACC building. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to transportation and traffic with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Traffic-1 through Traffic-3 specified for Tier II of the recommended project would not be required. Impacts related to transportation and traffic (as compared to Tier II of the recommended project) would be expected to be less than significant.

- Utilities and Service Systems

Tier I - Unlike Tier I of the recommended project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to utilities and service systems. The Re-opening the Existing MACC Alternative would result in greater impacts than the existing conditions and Tier I of the recommended project. The total development under this alternative would be greater than that of Tier I of the recommended project; therefore, this alternative would result in greater demand on water supply, wastewater treatment facilities, landfills and recycling requirements. Unlike Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to utilities and service systems with the Re-opening the Existing MACC Alternative it is expected that implementation mitigation measures would be required. Impacts related to utilities and service systems would be expected to be less than significant.

Tier II - Like Tier II of the recommended project, Tier II of the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to utilities and service systems. The Re-opening the Existing MACC Alternative avoids potential impacts to utilities and service systems that could result from the implementation of Tier II of the recommended project; however, the existing MACC is inefficient and seismic improvements to this structure would not improve the efficiency of this building, nor would the improvements entail LEED or energy-efficient elements. Although, the alternative would not entail the elements that are recommended in Tier II of the recommended project (i.e., no residential, retail, commercial uses, etc); this alternative would result in an increase in use to accommodate up to 250 inpatient beds as well as significant impacts to utilities and services due to the continued use of an

inefficient building. As such, the Re-opening the Existing MACC Alternative would be expected to result in the short- and long-term construction and operation impacts. Unlike the recommended project, this alternative would entail no additional construction of buildings and would not require additional use of existing infrastructure (i.e., sewer, water, etc.). With the Re-opening the Existing MACC Alternative, mitigation measures would be required. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be impacts to utilities and service systems with the Re-opening the Existing MACC Alternative, implementation of mitigation measures including Measures Utilities-1 through Utilitites-2 specified for Tier II of the recommended project would be required. Impacts related to utilities and service systems would be expected to be less than significant.

Feasibility: This alternative is considered infeasible.

Facts: The above feasibility finding is based on the following:

- The alternative would not meet all the project objectives.
- This alternative would only provide health and medical services to a fraction of the population that would be serviced by the project.
- It is anticipated that the costs and the scope requirements such as ensuring the staff, operational efficiency, and timely licensing of all of the functions would be infeasible.

V.D ALTERNATIVE 3: PUBLIC TRANSPORTATION FOCUSED ALTERNATIVE

Description of Alternative: The Public Transportation Focused Alternative would consist of both Tier I and Tier II development elements of the recommended project and there would be a greater focus on enhancing the current public transportation services at the existing campus and the surrounding area. The intent of this alternative is to reduce the anticipated vehicle trips to the campus by approximately 10% more than that of the recommended project by implementing a series of transit improvement measures. The transit improvement could potentially include a combination of one or more of the following: increase of frequency of service, improvement of connectivity in the system, coordination of transfers and other incentives for increased transit usage.

Effectiveness in Meeting Project Objectives: the Transportation Focused Alternative would be capable of meeting four of the objectives identified by the County. This alternative would meet the County objectives to maintain existing campus buildings and provide for a new MACC, Ancillary building, and site and tenant improvements. This alternative would meet the County's objectives to improve efficiency; provide a sustainable and connected campus; and to develop the campus and incorporated mixed-uses on the campus. However, increasing service frequency would not necessarily increase coverage area of the public transportation network.

Comparison of Effects of the Alternative to Effects of the Project: The regulatory framework and existing conditions would be the same as that described for the project. A summary comparison of this alternative to impacts of the project is presented in Table V-2. The analysis presented in the table shows that this alternative would still result in some of the significant impacts that would be anticipated as a result of the project.

- Aesthetics

  Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to aesthetics. Under the Public Transportation Focused Alternative, all of the changes recommended under the Tier I would take place and this alternative would increase nighttime light and glare above the existing levels and is therefore considered to have similar aesthetic impacts to the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to aesthetics with the Public Transportation Focused Alternative it is expected that implementation of measures Aesthetics-1 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to aesthetics. Under the Public Transportation Focused Alternative, all of the changes recommended under Tier II would take place (introduction of cohesive architectural design elements, improved medical facilities, retail, etc.) and the visual appearance of the project site would change as described in the recommended project. As with the recommended project, this alternative would have no impacts on scenic highways; however, it would potentially result in shade and shadows because it would introduce buildings at the recommended project site. This alternative would increase nighttime light and glare above the existing levels and is therefore considered to have aesthetic impacts similar to the recommended project. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to aesthetics with the Public Transportation Focused Alternative it is expected that implementation of measures Aesthetics-1 through Aesthetics-4 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Air Quality

  Tier I - Like the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Public Transportation Focused Alternative would require comparable construction and vehicle trips to the recommended project, the Public Transportation Focused Alternative is considered to have similar impacts to air quality compared with the recommended project. As with the recommended project, the Public Transportation Focused Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with the recommended project, this alternative would entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, and asphalt operations beyond the baseline conditions. The Public Transportation Focused Alternative would require grading or the use of construction equipment and mobile or stationary facilities, thus resulting in potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. As with the recommended project, the Public Transportation Focused Alternative would have the potential to conflict with the Air Quality

Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. As with the recommended project, the Public Transportation Focused Alternative would result in potentially significant impacts to air quality that would result from emissions from construction equipment. However, unlike the recommended project, the Public Transportation Focused Alternative would result in a net decrease in vehicle trips compared with baseline conditions. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Public Transportation Focused Alternative it is expected that implementation of measures Air-1 through Air-11 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II - Like the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Public Transportation Focused Alternative would require comparable construction and vehicle trips to the recommended project, the Public Transportation Focused Alternative is considered to have similar impacts to air quality compared with the recommended project. As with the recommended project, the Public Transportation Focused Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with the recommended project, this alternative would entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, and asphalt operations beyond the baseline conditions. The Public Transportation Focused Alternative would require grading or the use of construction equipment and mobile or stationary facilities, thus resulting in potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. As with the recommended project, the Public Transportation Focused Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. As with the recommended project, the Public Transportation Focused Alternative would result in potentially significant impacts to air quality that would result from emissions from construction equipment. However, unlike the recommended project, the Public Transportation Focused Alternative would result in a net decrease in vehicle trips compared with baseline conditions. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Public Transportation Focused Alternative it is expected that implementation of measures Air-1 through Air-11 specified for the recommended project would be required to reduce the anticipated impacts to the maximum extent feasible, although as with the recommended project, impacts would be significant and unavoidable.

- Cultural Resources

  Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to cultural resources. This alternative would result in construction-related and redevelopment impacts to cultural resources that would also occur as a result of the recommended

project. Like the recommended project, this alternative would entail ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would have the potential to occur. Under this alternative, the construction-related activities would result the potential to encounter paleontological resources, archeological resources, and human remains. In addition, the buildings that were identified as being replaced, reused, or removed in the recommended project would be vacated as with Tier I of the recommended project, resulting in similar impacts to historical resources as the recommended project. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to cultural resources with the Public Transportation Focused Alternative it is expected that implementation of Measures Cultural-1 through Cultural-5 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to cultural resources. This alternative would result in construction-related and redevelopment impacts to cultural resources that would also occur as a result of the recommended project. Like the recommended project, this alternative would entail ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would have the potential to occur. Under this alternative, the construction-related activities would result the potential to encounter paleontological resources, archeological resources, and human remains. In addition, the buildings that were identified as being replaced, reused, or removed in the recommended project would be reused, replaced, or removed as with Tier II of the recommended project, resulting in similar impacts to historical resources as the recommended project. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to cultural resources with the Public Transportation Focused Alternative it is expected that implementation of measures Cultural-1 through Cultural-5 specified for the recommended project would be required to reduce the anticipated impacts to the maximum extent feasible, although as with the recommended project, impacts would be significant and unavoidable.

- Geology and Soils

  Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to geology and soils. This alternative would potentially have impacts to geology and soils that are comparable to those that could result from the implementation of Tier I of the recommended project. Geology and soils related impacts would include short- and long-term construction and operation impacts that would occur as a result of the recommended project. Like the recommended project, this alternative would entail grading (excavation and fill), and construction of new structures and implementation of the mitigation measures would be required. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to geology and soils with the Public Transportation Focused Alternative it is expected that implementation of measures Geology-1 through Geology-3 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to geology and soils. This alternative would potentially have impacts to geology and soils that are comparable to those that could result from the implementation of Tier II of the recommended project. Geology and soils–related impacts would include short- and long-term construction and operation impacts that would occur as a result of the recommended project. Like the recommended project, this alternative would entail grading (excavation and fill), and construction of new structures and implementation of the mitigation measures would be required. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to geology and soils with the Public Transportation Focused Alternative it is expected that implementation of measures Geology-1 through Geology-3 specified for Tier II of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Greenhouse Gas Emissions

Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to greenhouse gas emissions. Due to the fact that the Public Transportation Focused Alternative would require construction, electricity consumption, and vehicle trips similar to the recommended project, the Public Transportation Focused Alternative is considered to have impacts to GHG emissions that are comparable to the recommended project. This alternative would entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, and electricity consumption beyond the baseline conditions. As with the recommended project, the Public Transportation Focused Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As with the recommended project, the Public Transportation Focused Alternative would result in potentially significant impacts to GHG emissions that would result from emissions from construction equipment. Since there would be potential construction impacts to GHG emissions with the Public Transportation Focused Alternative, it is anticipated that implementation of Measure GHG-1 would be required. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. However, unlike the recommended project, the Public Transportation Focused Alternative would result in a net decrease in vehicle trips compared with baseline conditions. Therefore, operational impacts of the Public Transportation Focused Alternative would be anticipated to be below the level of significance.

Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to greenhouse gas emissions. Due to the fact that the Public Transportation Focused Alternative would require construction, electricity consumption, and vehicle trips similar to the recommended project, the Public Transportation Focused Alternative is considered to have impacts to GHG emissions that are comparable to the recommended project. This alternative would entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker

commute trips, asphalt operations, and electricity consumption beyond the baseline conditions. As with the recommended project, the Public Transportation Focused Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As with the recommended project, the Public Transportation Focused Alternative would result in potentially significant impacts to GHG emissions that would result from emissions from construction equipment. Since there would be potential construction impacts to GHG emissions with the Public Transportation Focused Alternative, it is anticipated that implementation of Measure GHG-1 would be required. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. However, unlike the recommended project, the Public Transportation Focused Alternative would result in a net decrease in vehicle trips compared with baseline conditions. Therefore, operational impacts of the Public Transportation Focused Alternative would be anticipated to be below the level of significance.

- Hazards and Hazardous Materials

  Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hazards and hazardous materials. This alternative would have comparable impacts to hazards and hazardous materials than what would result from the implementation of the recommended project. Like the recommended project, this alternative could potentially entail construction and operational elements that might result in impacts related to hazards and hazardous materials; the implementation of the mitigation measures would potentially be required. Potential operational impacts from hazards or hazardous materials would be expected to occur. This alternative would result in impacts from hazards and hazardous materials. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hazards and hazardous materials with the Public Transportation Focused Alternative it is expected that implementation of measures Hazards-1 through Hazards-5 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hazards and hazardous materials. This alternative would have comparable impacts to hazards and hazardous materials than what would result from the implementation of the recommended project. Like the recommended project, this alternative could potentially entail construction and operational elements that might result in impacts related to hazards and hazardous materials; the implementation of the mitigation measures would potentially be required. Potential operational impacts from hazards or hazardous materials would be expected to occur. This alternative would result in impacts from hazards and hazardous materials. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hazards and hazardous materials with the Public Transportation Focused Alternative it is expected that implementation of measures Hazards-1 through Hazards-5 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Hydrology and Water Quality

  Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hydrology and water quality. The Public Transportation Focused Alternative would require construction that is comparable to the recommended project and would therefore result in potential impacts to hydrology and water quality that could result from the implementation of the recommended project. Because Tier I components would be constructed, the potential impact to surface water quality from erosion and runoff into storm drain systems would be comparable to the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the Public Transportation Focused Alternative it is expected that implementation of Measures Hydrology-1 through Hydrology-3, and Hazards-1 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hydrology and water quality. The Public Transportation Focused Alternative would require construction that is comparable to the recommended project and would therefore result in potential impacts to hydrology and water quality that could result from the implementation of the recommended project. Because Tier II components would be constructed, the potential impact to surface water quality from erosion and runoff into storm drain systems would be comparable to the recommended project. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the Public Transportation Focused Alternative it is expected that implementation of measures Hydrology-1 through Hydrology-4, and Hazards-1 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Noise

  Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to noise. Construction related noise impacts that would be comparable to the recommended project. This alternative would have significant noise related impacts that would result from use of loud machinery and other equipment, demolition, or other construction related activities. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to noise with the Public Transportation Focused Alternative it is expected that implementation of Measures Noise-1 through Noise-4 specified for the recommended project would be required.

  Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to noise. Construction related noise impacts that would be comparable to the recommended project. This alternative would have significant noise related impacts that would result from construction related activities. Like Tier II of the recommended project, this

alternative would result in cumulatively considerable impacts. Since there would be potential impacts to noise with the Public Transportation Focused Alternative it is expected that implementation of measures Noise-1 through Noise-4 specified for the recommended project would be required to reduce the anticipated impacts to the maximum extent feasible, although as with the recommended project, impacts would be significant and unavoidable.

- Population and Housing

  Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to population and housing. Like Tier I of the recommended project this alternative would not contribute to or result in population growth beyond the planned growth for the area and as such would not result in impacts related to population and housing. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to population and housing with the Public Transportation Focused Alternative, and no mitigation measures would be required. Therefore, Tier I impacts related to population and housing would be expected to be less than significant.

  Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to population and housing. As with the recommended project, residential units would be constructed. Like Tier II of the recommended project this alternative would not contribute to or result in population growth beyond the planned growth for the area and as such would not result in impacts related to population and housing. This alternative would contribute to regional housing and employment goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to population and housing with the Public Transportation Focused Alternative, and no mitigation measures would be required. Therefore, Tier II impacts related to population and housing would be expected to be less than significant.

- Public Services

  Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts public services. Like the recommended project, the Public Transportation Focused Alternative would not result in impacts to public services. This alternative would include the development of Tier I. As with the recommended project, the Public Transportation Focused Alternative would not result in significant impacts to public services. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to public services with the Public Transportation Focused Alternative, and no mitigation measures would be required. Therefore, Tier I impacts related to public services would be expected to be less than significant.

Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts public services. Like the recommended project, the Public Transportation Focused Alternative would not result in impacts to public services. This alternative would include the development of Tier II. Tier II requires the development of residential units. Therefore, the residential units would be included in this alternative. However, as with the recommended project, the Public Transportation Focused Alternative would not result in significant impacts to public services. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to public services with the Public Transportation Focused Alternative, and no mitigation measures would be required. Therefore, Tier II impacts related to public services would be expected to be less than significant.

- Recreation

  Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to recreation. Under the Public Transportation Focused Alternative, Tier I building components would be constructed but they would not contribute to or result in significant impacts. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. This alternative would be comparable to the recommended project. As with the recommended project, there would be no impacts to recreation with the Public Transportation Focused Alternative, and no mitigation measures would be required. Therefore, Tier I impacts related to recreation would be expected to be less than significant.

  Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to recreation. Under the Public Transportation Focused Alternative, Tier II building and development components would be constructed but they would not contribute to or result in significant impacts. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. This alternative would be comparable to the recommended project. As with the recommended project, there would be no impacts to recreation with the Public Transportation Focused Alternative, and no mitigation measures would be required. Therefore, Tier II impacts related to recreation would be expected to be less than significant.

- Transportation and Traffic

  Tier I - Unlike the recommended project, the Public Transportation Focused Alternative would not have the potential to result in impacts to transportation and traffic. As recommended, the Public Transportation Focused Alternative would add additional routes and shuttles to the existing network utilize / purchase an off-site lot to transfer patients / visitors, and increase subsidies for visitors using public transportation. As with the recommended project, the Public Transportation Focused Alternative would involve some construction, operation, and maintenance activities beyond the baseline conditions. However, all the structures recommended under the recommended project would be built. Due to the fact that the Public Transportation Focused Alternative would offset the transportation related impacts, this alternative

would result in significantly less vehicle trips than the recommended project, thus, the Public Transportation Focused Alternative is considered to have fewer impacts to traffic and transportation compared with the recommended project; however, construction-related impacts associated with Tier I of the recommended project would still occur. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to transportation and traffic with the Public Transportation Focused Alternative it is expected that implementation of measure Traffic-1 specified for the recommended project would not be required. Therefore, Tier I impacts related to transportation and traffic would be expected to be less than significant.

Tier II - Unlike the recommended project, the Public Transportation Focused Alternative would not have the potential to result in impacts to transportation and traffic. As recommended, the Public Transportation Focused Alternative would add additional routes and shuttles to the existing network utilize / purchase an off-site lot to transfer patients / visitors, and increase subsidies for visitors using public transportation. As with the recommended project, the Public Transportation Focused Alternative would involve some construction, operation, and maintenance activities beyond the baseline conditions. However, all the structures recommended under the recommended project would be built. Due to the fact that the Public Transportation Focused Alternative would offset the transportation related impacts, this alternative would result in significantly less vehicle trips than the recommended project, thus, the Public Transportation Focused Alternative is considered to have fewer impacts to traffic and transportation compared with the recommended project.

Under this alternative, the recommended project (Tiers I and II combined) would have a total net trip generation of 17,709 daily trips of which 1,116 trips would occur during the morning peak hour and 1,578 trips during the evening peak hour. This represents 10% less daily, morning, and evening peak hour trips than the recommended project. Similar to Tier II of the recommended project, this alternative would have the potential to result in significant traffic impacts. However, there would be up to 10% less in trip generation, than the recommended project. No significant differences in travel patterns outside the project area would be expected between this alternative and the recommended project. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to transportation and traffic with the Public Transportation Focused Alternative it is expected that implementation of measures Traffic-1 through Traffic-3 specified for the recommended project would not be required. Therefore, Tier II impacts related to transportation and traffic would be expected to be less than significant.

- Utilities and Service Systems

  Tier I - Like Tier I of the recommended project, the Public Transportation Focused Alternative would not be expected to result in impacts to utilities and service systems. Under this alternative scenario, the components of Tier I would be constructed as discussed in the Section 3.13. The Public Transportation Focused Alternative results in impacts on utilities and service systems that are similar to the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively significant impacts. As with Tier I of the recommended project, it is

anticipated that no mitigation measures would be required to reduce the anticipated impacts to below the level of significance.

Tier II - Like Tier II of the recommended project, the Public Transportation Focused Alternative would be expected to result in impacts to utilities and service systems. Under this alternative scenario, the components of Tier II would be constructed (i.e., residential, commercial, medical space, etc.), therefore, there would be a potentially significant increase in the demand on water supply, wastewater treatment, solid waste, or other utilities within the project area and would occur. The Public Transportation Focused Alternative results in impacts on utilities and service systems that are similar to the recommended project. Like Tier II of the recommended project, this alternative would not result in cumulatively significant impacts. However, since there would be potential impacts to utilities and service systems with the Public Transportation Focused Alternative it is expected that implementation of measures Utilities-1 through Utilities-2 specified for the recommended project would not be required to reduce the anticipated impacts to below the level of significance.

Feasibility: This alternative is infeasible.

Facts: The above feasibility finding is based on the following:

- This alternative would meet the County's objectives to improve efficiency; provide a sustainable and connected campus; and to develop the campus and incorporated mixed-uses on the campus. However, increasing service frequency would not necessarily increase coverage area of the public transportation network.
- The existing public transportation network already serves this area with adequate coverage and frequency to meet the existing and anticipated demands. It is for these reasons that this alternative would not be feasible. Despite this fact, it is worth noting that elements of this alternative are worthy of consideration and would be incorporated into the Master Plan for the recommended project, as appropriate.

V.E ALTERNATIVE 4: 500 BEDS (IN TIER I) ALTERNATIVE

Description of Alternative: Alternative 4, the 500 Beds (in Tier I) Alternative, would entail the development and operation of a 500-bed hospital. Tier I would consist of the development of a 500 bed hospital that would occupy the existing MACC. The existing MACC would provide up to 500 inpatient beds along with the inpatient services that were previously provided at the hospital. However, in order to provide inpatient services, the existing MACC would require significant seismic improvements by January 2020 for compliance with OSHPD requirements. The OSHPD requirements include but are not limited to improvements such as retrofitting the hospital buildings for acute care operation beyond 2030 in the event of seismic activity.

Effectiveness in Meeting Project Objectives: Alternative 4, 500 Beds (in Tier I) Alternative would be capable of meeting one of the objectives identified by the County, objective 6. The focus of this alternative would be to obtain the licensing, funding, and adequate operational requirements (including but not limited to staff, supplies, etc.) to re-open the existing MACC. Under this alternative, neither Tier I nor Tier II of the recommended project would be constructed. It is anticipated that no LEED, sustainable design, community-based, comprehensive, or mixed use development as described in Tier I and Tier II of the recommended project would occur. There would be no new development.

Comparison of Effects of the Alternative to Effects of the Project: The regulatory framework and existing conditions would be the same as that described for the project. A summary comparison of this alternative to impacts of the recommended project is presented in Table V-2. The analysis presented in the table shows that this alternative would result in some of the significant impacts that would be anticipated as a result of the project.

- Aesthetics

  Tier I - Like Tier I of the recommended project, the 500 Beds (in Tier I) Alternative would have the potential to result in impacts to aesthetics. This alternative would introduce additional uses at the project site; however, none of the Tier I or Tier II components would be constructed. Given that the recommended 500 Beds Alternative would occur the former MACC building, impacts to visual resources would be similar to the No Project Alternative. Therefore, this alternative would not have effects on scenic vistas, would result in fewer shadow impacts, and would have fewer impacts related to nighttime light and glare than the recommended project even though it would increase nighttime light and glare above the existing levels (reuse of the former MACC building). The 500 Beds Alternative would have fewer impacts on aesthetics than the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. However, since there would be potential impacts to aesthetics with the 500 Beds Alternative it is expected that implementation of measure Aesthetics-1 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Like Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would have the potential to result in significant impacts to aesthetics. Under the 500 Beds (in Tier I) Alternative, potential aesthetic changes relating to the replacement of existing site features would not occur. This alternative would not result in the more intensive development or the increase in nighttime lighting from vehicles, buildings, landscape features, and signage associated with commercial uses under the recommended project. As a result, the project site would continue in its existing form with its visual and aesthetic character unchanged. Even though the aesthetic changes resulting from the recommended project would not be considered significant impacts, the 500 Beds (in Tier I) Alternative's impacts to aesthetics would be less because no change, such as increased nighttime lighting, would occur. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. However, since there would be impacts to aesthetics with the 500 Beds (in Tier I) Alternative, implementation of measures Aesthetics-1 through Aesthetics-4 specified for Tier II of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Air Quality

  Tier I - Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in impacts to air quality. Due to the fact that the 500 Beds Alternative would require less construction and less vehicle trips than the recommended project, the 500 Beds Alternative is considered to have lesser impacts to air quality compared with the recommended project. Unlike the recommended project, the 500 Beds Alternative would require only limited construction and site improvement activities. Unlike the recommended project, this alternative would not

entail demolition of existing structures or grading activities beyond the baseline conditions. The 500 Beds Alternative would require the use of a limited number of construction equipment and would generate vehicle trips, thus resulting in potentially significant impacts to air quality, particularly with regard to NO_x emissions. As with the recommended project, the 500 Beds Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. However, due to the fact that no grading, excavation, or major construction activities would occur, it is anticipated that implementation of mitigation measures would not be required. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to air quality with the 500 Beds Alternative it is expected that implementation of measures Air-1 through Air-11 specified for the recommended project would not be required. Impacts related to air quality would be expected to be less than significant.

Tier II - Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to ambient air quality. The 500 Beds (in Tier I) Alternative would not involve as considerable an amount of construction activities beyond the baseline conditions. Unlike the recommended project, this alternative would not entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, or asphalt operations beyond the baseline conditions. The 500 Beds (in Tier I) Alternative would not require grading or the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of volatile organic compounds (VOCs). The 500 Beds (in Tier I) Alternative would not have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Implementation of Tier II the recommended project would be expected to result in cumulative construction-related impacts and impacts during operation that would remain above the level of significance with the incorporation of mitigation measures. Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would avoid potential significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the recommended project site by employees and visitors. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to ambient air quality with the 500 Beds (in Tier I) Alternative, implementation of measures Air-1 through Air-11 would not be required. Impacts related to air quality would be expected to be less than significant.

- Cultural Resources

  Tier I - Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in impacts to cultural resources. The 500 Beds (in Tier I) Alternative would lessen potential impacts to cultural resources that could result from the implementation of the recommended project. Unlike the recommended project, this

alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of historical resources would not occur. As a result, the project site would continue in its existing form with its cultural resources largely unchanged. Structural and tenant refinements related to the incorporation of a 500-bed hospital within the existing MACC, a historical resource, would require review for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to cultural resources with the 500 Beds Alternative it is expected that implementation of measures Cultural-1 through Cultural-5 specified for the recommended project would not be required. Impacts related to cultural resources would be expected to be less than significant.

Tier II - Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to cultural resources. The 500 Beds (in Tier I) Alternative would avoid the construction-related and redevelopment impacts to cultural resources that would occur as a result of the recommended project. Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would not occur. As a result, the project site would continue in its existing form with its cultural resources unchanged. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to cultural resources with the 500 Beds (in Tier I) Alternative, implementation of measures Cultural-1 through Cultural-5 specified for Tier II of the recommended project would not be required. Impacts related to cultural resources would be expected to be less than significant.

- Geology and Soils

Tier I - Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in impacts to geology and soils. This alternative avoids potential impacts to geology and soils that could result from the implementation of the recommended project. Unlike the recommended project, this alternative would entail no grading (excavation and fill), modification of or construction of new structures although the existing MACC would require significant seismic improvements and modification and implementation of the mitigation measures would be required. However, the anticipated seismic improvements that would be required under this alternative would be considerable and would require different mitigation than that recommended for the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Although the implementation of measures Geology-1 through Geology-3 specified for Tier I of the recommended project would not be required, other mitigation measure would be required for this alternative to reduce the anticipated impacts to below the level of significance.

Tier II - Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to geology and soils. The

500 Beds (in Tier I) Alternative avoids potential impacts to geology and soils that could result from the implementation of the recommended project. This alternative would avoid short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier II of the recommended project, this alternative would entail no grading (excavation and fill), modification of or construction of new structures although the existing MACC would require significant seismic improvements and modification and implementation of the mitigation measures would be required. However, the anticipated seismic improvements that would be required under this alternative would be considerable and would require different mitigation than that recommended for the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Although the implementation of measures Geology-1 through Geology-3 specified for Tier II of the recommended project would not be required, other mitigation measure would be required for this alternative to reduce the anticipated impacts to below the level of significance.

- Greenhouse Gas Emissions

  Tier I - Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in impacts to greenhouse gas emissions. Due to the fact that the 500 Beds (in Tier I) Alternative would require less construction, less electricity consumption, and less vehicle trips than the recommended project, the 500 Beds Alternative is considered to have lesser impacts to GHG emissions compared with the recommended project. Unlike the recommended project, the 500 Beds Alternative would require only limited construction and site improvement activities. Unlike the recommended project, this alternative would not entail demolition of existing structures or major construction activities beyond the baseline conditions. The 500 Beds Alternative would require the use of a limited number of construction equipment, would generate vehicle trips, and would require electricity consumption, thus resulting in potentially significant impacts to GHG emissions. As with the recommended project, the 500 Beds Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Since there would be no construction of new buildings associated with the 500 Beds (in Tier I) Alternative, it is anticipated that implementation of mitigation measures would not be required. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to greenhouse gas emissions with the 500 Beds Alternative it is expected that implementation of measure GHG-1 specified for the recommended project would not be required. Impacts related to greenhouse gas emissions would be expected to be less than significant.

  Tier II - Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to GHG emissions. The 500 Beds (in Tier I) Alternative would involve construction, operation, improvements and maintenance activities to the existing MACC beyond the baseline conditions although this development would not be as significant as with Tier II of the recommended project. Unlike Tier II of the recommended project, this alternative would not entail demolition of existing structures, use of construction materials or

equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, or electricity consumption beyond the baseline conditions. The 500 Beds (in Tier I) Alternative would not require the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to GHG emissions. Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Potential GHG emission impacts associated with construction and operation of Tier II would remain as significant and unavoidable even with the incorporation of mitigation measures. Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would avoid potential significant impacts to GHG emissions that would result from emissions from construction equipment, electricity consumption, and the anticipated increase in vehicle miles traveled to the recommended project site by employees and visitors. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to GHG emissions with the 500 Beds (in Tier I) Alternative, implementation of measure GHG-1 would not be required. Impacts related to greenhouse gas emissions would be expected to be less than significant.

- Hazards and Hazardous Materials

  Tier I - Unlike the recommended project, this alternative would not have the potential to result in impacts to hazards and hazardous materials. This alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the recommended project. Unlike the recommended project, this alternative would entail no grading (excavation and fill) or the construction of new structures. However, this alternative would entail modification of the existing MACC building that might result in impacts related to hazards and hazardous materials. The implementation of the mitigation measures identified in Section 3.6 would be required. Potential operational impacts from hazards or hazardous materials would likely occur. This alternative would not result in short- or long-term impacts from hazards and hazardous materials that would be comparable to the impacts associated with the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to hazards and hazardous materials with the 500 Beds Alternative it is expected that implementation of measures Hazards-1 through Hazards-5 specified for the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Unlike Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The 500 Beds (in Tier I) Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the recommended project. Unlike Tier I of the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6 would not be required. Potential operational impacts from hazards or hazardous

materials would not occur. The 500 Beds (in Tier I) Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hazards and hazardous materials with the 500 Beds (in Tier I) Alternative, implementation of measures Hazards-1 through Hazards-5 specified for Tier I of the recommended project would not be required to reduce the anticipated impacts to below the level of significance.

- Hydrology and Water Quality

  Tier I - Like the recommended project, this alternative would have the potential to result in impacts to hydrology and water quality. Because there are no grading or fill activities, the implementation of the mitigation measures identified in Section 3.7 to reduce impacts from pollution entering the storm drain system would not be required. However, under the recommended project, the new MACC building would be an efficient and sustainable building, however this alternative would not include development of the sustainable or efficient elements that would reduce runoff and potential water quality related impacts. The existing MACC as it currently operates is inefficient. Like the recommended project, this alternative would require the implementation of mitigation measures; however, efforts to re-open and expand the existing MACC would be expected to result in impacts to hydrology and water quality that would be greater than the recommended project. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the 500 Beds Alternative it is expected that implementation of measures Hydrology-1 through Hydrology-4, specified for the recommended project would be required. However, it is anticipated that Hazards-1 specified for Tier I of the recommended project would not be required. Impacts related to hydrology and water quality would be expected to be less than significant.

  Tier II - Like Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would have the potential to result in significant impacts to hydrology and water quality. The 500 Beds (in Tier I) Alternative avoids impacts to hydrology and water quality that could result from the implementation of the recommended project. Section 3.7, Hydrology and Water Quality, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would entail no conversion of vacant land including grading, paving, and construction; however, the existing MACC is inefficient and seismic improvements to this structure would not improve the efficiency or reduce the water use of this building, nor would the improvements entail LEED or energy efficient elements and implementation of the mitigation measures would be required. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be impacts to hydrology and water quality with the 500 Beds (in Tier I) Alternative, implementation of measures Hydrology-1 through Hydrology-4 specified for Tier II of the recommended project would be required. However, it is anticipated that Hazards-1 specified for Tier II of the recommended project would not be required. Impacts related to hydrology and water quality would be expected to be less than significant.

- Noise

  Tier I - Unlike the recommended project, the 500 Beds Alternative would not have the potential to result in significant impacts to noise. Under this alternative, the construction related noise impacts would not occur. Both Tier I and Tier II related noise impacts would be avoided. Unlike the recommended project, this alternative would not be expected to result in noise related construction impacts. As such, this alternative would be expected to result in fewer impacts associated with construction related noise impacts than with the recommended project. Unlike Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to noise with the 500 Beds Alternative it is expected that implementation of measures Noise-1 through Noise-4 specified for the recommended project would not be required. Impacts related to hydrology and water quality would be expected to be less than significant.

  Tier II - Unlike Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to noise. The 500 Beds (in Tier I) Alternative would not entail for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Section 3.8 of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not result in impacts related to noise and no mitigation measures would be required. The 500 Beds (in Tier I) Alternative would not result in short- or long-term impacts to noise. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to noise with the 500 Beds (in Tier I) Alternative, implementation of measures Noise-1 through Noise-4 specified for Tier II the recommended project would not be required. Impacts related to hydrology and water quality would be expected to be less than significant.

- Population and Housing

  Tier I - Like the recommended project, the 500 Beds Alternative would not have the potential to result in significant impacts to population and housing. Like the recommended project, this alternative would not be expected to result in impacts related to population and housing. Unlike the recommended project, his alternative would not include Tier I or Tier II elements and would not include housing. This alternative it would not contribute to regional housing and employment goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to population and housing with the 500 Beds Alternative, and no mitigation measures would be required. Impacts related to population and housing would be expected to be less than significant.

  Tier II - As with Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to population and housing. The 500 Beds (in Tier I) Alternative would not assist in meeting regional housing and employment goals. Under the 500 Beds (in Tier I) Alternative, potential changes related to population and housing would not occur. This alternative would not

result in any residential development or more intensive development associated with the medical, commercial or retail uses under the recommended project. Even though potential impacts resulting from Tier II of the recommended project would not be considered significant, the 500 Beds (in Tier I) Alternative's impacts to population and housing would be less than the recommended project because no change, such as the 100-unit residential component, would be implemented. However, the 500 Beds (in Tier I) Alternative would not contribute to the regional housing goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to population and housing with the 500 Beds (in Tier I) Alternative, and no mitigation measures would be required. Impacts related to population and housing would be expected to be less than significant.

- Public Services

  Tier I - Like the recommended project, the 500 Beds Alternative would not have the potential to result in significant impacts to public services. As with the recommended project, the 500 Beds Alternative would not result in impacts related to public services. This alternative would not require the development of residential units. Unlike the recommended project, under this alternative, there would be no Tier I or Tier II development. There would not be an increase in the need for additional fire protection, police protection, parks, schools, and other public services, like the recommended project. This alternative, however, would not contribute to regional housing and employment goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). However, like the recommended project, this alternative would not be expected to result in significant impacts related to public services. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to public services with the 500 Beds Alternative, and no mitigation measures would be required. Impacts related to public services would be expected to be less than significant.

  Tier II - As with Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to public services. The 500 Beds (in Tier I) Alternative would not result in the need for additional fire protection, police protection, schools, parks, and other public services. Section 3.10, Public Services, of this EIR provides a discussion of the potential impact to public services related to Tier II of the recommended project. Like Tier II of the recommended project, the 500 Beds (in Tier I) Alternative would not create a significant net increase in public services and would require the implementation of the mitigation measures. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to public services with the 500 Beds (in Tier I) Alternative, and no mitigation measures would be required. Impacts related to public services would be expected to be less than significant.

- Recreation

  Tier I - Like the recommended project, the 500 Beds Alternative would not have the potential to result in significant impacts to recreation. Under the 500 Beds Alternative,

the Tier I and Tier II building components would not be constructed. The 500 Beds Alternative would result in no residential units built. Like the recommended project, this alternative would not be expected to result in impacts related to recreation. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to recreation with the 500 Beds Alternative, and no mitigation measures would be required. Impacts related to recreation would be expected to be less than significant.

Tier II - As with Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to recreation. The 500 Beds (in Tier I) Alternative would not result in impacts to parks and recreational facilities. The 500 Beds (in Tier I) Alternative would also not create an additional demand for the County's parks. Tier II of the recommended project would not result in significant impacts to existing parks or recreational facilities given the limited number of residential units recommended under Tier II and the availability and location of existing recreational facilities. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to recreation with the 500 Beds (in Tier I) Alternative, and no mitigation measures would be required. Impacts related to recreation would be expected to be less than significant.

- Transportation and Traffic

Tier I - Unlike the recommended project, the 500 Bed Alternative would not have the potential to result in significant impacts to transportation and traffic. The 500 Beds Alternative would result in a smaller development scenario than that recommended development components under Tier I and Tier II of the recommended project. The total development under this alternative would be significantly less than that of the recommended project and would generate a substantial amount less of traffic trip generation given the reduced developed. This alternative would contain no new development and therefore would not generate any new trips. This alternative would generate fewer trips than the existing baseline conditions. The existing baseline trip generation includes both operational and non-operational existing uses, which includes the existing MACC building. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to transportation and traffic with the 500 Beds Alternative it is expected that implementation of measure Traffic-1 specified for the recommended project would not be required. Impacts related to transportation and traffic would be expected to be less than significant.

Tier II - Unlike Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to transportation and traffic. The 500 Beds (in Tier I) Alternative avoids potential impacts to transportation and traffic that could result from the implementation of Tier II of the recommended project. The 500 Beds (in Tier I) Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the recommended project. Unlike the Tier II of recommended project, this alternative would create no additional transportation or circulation components and implementation of the mitigation measures would not be required. This alternative would contain no new development and therefore, would not generate any new trips.

This alternative would generate fewer trips than the existing baseline conditions. The existing baseline trip generation includes both operational and non-operational existing uses, which includes the existing MACC building. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to transportation and traffic with the 500 Beds (in Tier I) Alternative, implementation of measures Traffic-1 through Traffic-3 specified for Tier II of the recommended project would not be required. Impacts related to transportation and traffic would be expected to be less than significant.

- Utilities and Service Systems

  Tier I - Unlike Tier I of the recommended project, the 500 Beds Alternative would have the potential to result in significant impacts to utilities and service systems. The 500 Beds Alternative would result in greater impacts than the existing conditions and Tier I of the recommended project. The total development under this alternative would be greater than that of Tier I of the recommended project; therefore, this alternative would result in greater demand on water supply, wastewater treatment facilities, landfills and recycling requirements. Unlike Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to utilities and service systems with the 500 Beds Alternative it is expected that implementation mitigation measures would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Like Tier II of the recommended project, Tier II of the 500 Beds (in Tier I) Alternative would have the potential to result in significant impacts to utilities and service systems. The 500 Beds (in Tier I) Alternative avoids potential impacts to utilities and service systems that could result from the implementation of Tier II of the recommended project; however, the existing MACC is inefficient and seismic improvements to this structure would not improve the efficiency of this building, nor would the improvements entail LEED or energy-efficient elements. Although, the alternative would not entail the elements that are recommended in Tier II of the recommended project (i.e., no residential, retail, commercial uses, etc); this alternative would result in an increase in use to accommodate 500 inpatient beds as well as significant impacts to utilities and services due to the continued use of an inefficient building. As such, the 500 Beds (in Tier I) Alternative would be expected to result in the short- and long-term construction and operation impacts. Unlike the recommended project, this alternative would entail no additional construction of buildings and would not require additional use of existing infrastructure (i.e., sewer, water, etc.). With the 500 Beds (in Tier I) Alternative, mitigation measures would be required. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts. Since there would be impacts to utilities and service systems with the 500 Beds (in Tier I) Alternative, implementation of mitigation measures including measures Utilities-1 through Utilitites-2 specified for Tier II of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Feasibility: This alternative is infeasible.

Facts: The above feasibility finding is based on the following:

- This alternative would not meet the majority of the other County objectives.

- The costs seismic upgrades, inpatient improvements, and operational requirements associated with opening a 500 bed hospital without addressing the efficiency concerns and other issues at the existing MACC that would be evaluated through a campus-wide plan would make this alternative infeasible.

V.F ALTERNATIVE 5: NO TIER II ALTERNATIVE

Description of Alternative: Alternative 5, the No Tier II Alternative, would entail the development of only Tier I of the recommended project. Alternative 5 would be located on the existing campus. This alternative would focus on the development of two new buildings (the new MACC and the Ancillary Building) tenant improvements in existing buildings, site improvements, and potential relocation of the MRI Building on the tech dock behind the new MACC. This alternative would not entail the campus-wide Master Plan development described in Tier II of the recommended project. Also, the existing MACC building, Emergency Room, Storage Building, and Cooling Towers would be vacated but would not be reused, replaced, or removed as a part of this alternative.

Effectiveness in Meeting Project Objectives: Alternative 5, No Tier II Alternative would be capable of meeting all Tier I objectives identified by the County but would not meet any of the Tier II objectives.

Comparison of Effects of the Alternative to Effects of the Project: The regulatory framework and existing conditions would be the same as that described for the project. A summary comparison of this alternative to impacts of the project is presented in Table V-2. The analysis presented in the table shows that this alternative would result in some of the significant impacts that would be anticipated as a result of the project.

- Aesthetics

  Tier I - Like Tier I of the recommended project, the No Tier II Alternative would have the potential to result in impacts to aesthetics. This alternative would introduce additional uses at the recommended project site through the construction of the Tier I component. The impacts to visual resources would be comparable to those discussed for Tier I in Section 3.1, Aesthetic Resources, of this EIR. Even though the No Tier II Alternative would increase nighttime light and glare above the existing levels by creating new sources of light and glare, the alternative would affect scenic vistas, would result in fewer shadow impacts, and would have fewer impacts related to nighttime light and glare than the recommended project would have. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. The No Tier II Alternative would have fewer impacts to aesthetics than the recommended project would have. Measure Aesthetics-1 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Unlike Tier II of the recommended project, the No Tier II Alternative would not result in impacts to aesthetics. Tier II of the recommended project would not be implemented. Therefore, the No Tier II Alternative would avoid the impacts associated with Tier II of the recommended project. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be not be potential for Tier II impacts to aesthetics with this alternative, no mitigation specified for Tier II of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

- Air Quality

  Tier I - Like Tier I of the recommended project, the No Tier II Alternative would have the potential to result in impacts to air quality. As with the recommended project, the No Tier II Alternative would require the use of a limited number of construction equipment and would generate vehicle trips, thus resulting in potentially significant impacts to air quality, particularly with regard to NO_x emissions. As with the recommended project, the No Tier II Alternative would have the potential to conflict with the Air Quality Management Plan, violate existing air quality standards, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. The grading, excavation, and construction activities would be reduced. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Tier I impacts and mitigation measures as described in Section 3.2, *Air Quality*, of this EIR would be comparable to mitigation measures for the recommended project. Measures Air-1 through Air-11 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Unlike Tier II of the recommended project, the No Tier II Alternative would not have the potential to result in significant impacts to ambient air quality. The No Tier II Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike the recommended project, this alternative would not entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, or asphalt operations beyond the baseline conditions. The No Tier II Alternative would not require grading or the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. The No Tier II Alternative would not have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Implementation of Tier II the recommended project would be expected to result in cumulative construction-related impacts and impacts during operation that would remain above the level of significance with the incorporation of mitigation measures. Unlike Tier II of the recommended project, the No Tier II Alternative would avoid potential significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the recommended project site by employees and visitors. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts related to Tier I of the recommended project only. Since there would be no impacts to ambient air quality with the No Tier II Alternative, implementation of measures Air-1 through Air-11 would not be required. Impacts related to air quality would be expected to be less than significant.

- Cultural Resources

  Tier I - Like Tier II of the recommended project, Tier I of the No Tier II Alternative would have the potential to result in impacts to cultural resources. The No Tier II

Alternative would still slightly alter the appearance of existing historic resources with the development of the new structure. Like the recommended project, this alternative would entail ground-disturbing construction activities. Outside of the new development, the recommended project site would continue in its existing form with cultural resources largely unchanged. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Measures Cultural-1 through Cultural-5 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II - Unlike Tier II of the recommended project, the No Tier II Alternative would not have the potential to result in significant impacts to cultural resources. The No Tier II Alternative would avoid the construction-related and redevelopment impacts to cultural resources that would occur as a result of the recommended project. Unlike Tier II of the recommended project, the No Tier II Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would not occur. As a result, the project site would continue in its existing form with its cultural resources unchanged. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts related to Tier I of the recommended project only. Since there would be no impacts to cultural resources with the No Tier II Alternative, implementation of measures Cultural-1 through Cultural-5 specified for Tier II of the recommended project would not be required. Impacts related to cultural resources would be expected to be less than significant.

- Geology and Soils

  Tier I - Like Tier I of the recommended project, Tier I of the No Tier II Alternative would have the potential to result in impacts to geology and soils. As with Tier I of the recommended project described in Section 3.4 of this EIR, this alternative would have potential impacts to geology and soils from the implementation of the recommended project. Like Tier I of the recommended project, this alternative would entail grading (excavation and fill), modification of existing structures, and construction of new structures. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Implementation of the mitigation measures identified for Tier I of the recommended project would be required. Measures Geology-1 through Geology-3 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Unlike Tier II of the recommended project, the No Tier II Alternative would not have the potential to result in significant impacts to geology and soils. The No Tier II (in Tier I) Alternative avoids potential impacts to geology and soils that could result from the implementation of the recommended project. This alternative would avoid short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier II of the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures, or construction of new structures and implementation of the mitigation measures would not be required. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to geology and soils with the No Tier II Alternative, implementation of measures Geology-1 through Geology-3 specified for Tier II of the recommended project would not be required.

- Greenhouse Gas Emissions

  Tier I - Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in impacts to GHG emissions with regard to Tier I development. Due to the fact that the No Tier II Alternative would not entail a Tier II component and would thus require less construction, less electricity consumption, and less vehicle trips than the recommended project, the No Tier II Alternative is considered to have fewer impacts to GHG emissions compared with the recommended project. Unlike the recommended project, this alternative would not entail demolition of existing structures or major construction activities beyond Tier I of the recommended project. The No Tier II Alternative would still require the use of construction equipment, would generate vehicle trips, and would require electricity consumption, thus resulting in potentially significant impacts to GHG emissions. As with Tier I of the recommended project described in Section 3.5 of this EIR, the No Tier II Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment, and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Measure GHG-1 specified for Tier I of the recommended project would be required. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts to reduce the anticipated impacts to below the level of significance.

  Tier II - Unlike Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to GHG emissions. The No Tier II Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike Tier II of the recommended project, this alternative would not entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, or electricity consumption beyond the baseline conditions. The No Tier II Alternative would not require the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to GHG emissions. Unlike Tier II of the recommended project, the No Tier II Alternative would not have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Potential GHG emission impacts associated with construction and operation of Tier II would remain as significant and unavoidable even with the incorporation of mitigation measures. Unlike Tier II of the recommended project, the No Tier II Alternative would avoid potential significant impacts to GHG emissions that would result from emissions from construction equipment, electricity consumption, and the anticipated increase in vehicle miles traveled to the recommended project site by employees and visitors. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts related to Tier I of the recommended project only. Since there would be no impacts to GHG emissions with the No Tier II Alternative, implementation of measure GHG-1 would not be required to reduce the anticipated impacts to below the level of significance.

- Hazards and Hazardous Materials

  Tier I - Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in impacts to hazards and hazardous materials. As with Tier I of the recommended project as described in Section 3.6, this alternative would have the potential to result in impacts to hazards and hazardous materials. Like the recommended project, this alternative would entail grading (excavation and fill) and construction of new structures. However, this alternative would not entail demolition or the impacts associated with Tier II of the recommended project. Potential operational impacts from hazards or hazardous materials would likely occur. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Measures Hazards-1 through Hazards-5 identified in Section 3.6 for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Unlike Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The No Tier II (in Tier I) Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the recommended project. Unlike Tier I of the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6 would not be required. Potential operational impacts from hazards or hazardous materials would not occur. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. The No Tier II Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Since there would be no impacts to hazards and hazardous materials with the No Tier II Alternative, implementation of measures Hazards-1 through Hazards-5 specified for Tier I of the recommended project would not be required to reduce the anticipated impacts to below the level of significance.

- Hydrology and Water Quality

  Tier I - Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in impacts to hydrology and water quality. Because there are grading and construction related activities, implementation of the mitigation measures identified in Section 3.7 would be required to reduce impacts from pollution entering the storm drain system for Tier I of the recommended project. However, this alternative would not include Tier II development and would not have the potential to result in Tier II impacts. Like the recommended project, this alternative would require the implementation of Tier I Measures Hydrology-1 through Hydrology-3, and Hazards-1. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts to reduce the anticipated impacts to below the level of significance.

  Tier II - Unlike Tier I of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The No Tier II (in Tier I) Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the recommended

project. Unlike Tier I of the recommended project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6 would not be required. Potential operational impacts from hazards or hazardous materials would not occur. The No Tier II Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hazards and hazardous materials with the No Tier II Alternative, implementation of measures Hydrology-1 through Hydrology-3 and Hazards-1 specified for Tier I of the recommended project would not be required to reduce the anticipated impacts to below the level of significance.

- Noise

  Tier I - Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in significant impacts to noise. Under this alternative, the construction-related noise impacts associated with Tier I of the recommended project would occur, as discussed in Section 3.8 of this EIR. However, Tier II–related noise impacts would be avoided. Like the recommended project, this alternative would be expected to result in construction-related noise impacts. However, by omitting the Tier II component, this alternative would be expected to result in fewer impacts associated with construction-related noise than would be expected to result from the recommended project. Like Tier I of the recommended project, this alternative would result in cumulatively considerable impacts. Measures Noise-1 through Noise-4 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Unlike Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to noise. The No Tier II Alternative would not entail for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Section 3.8 of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the recommended project. Unlike Tier II of the recommended project, the No Tier II Alternative would not result in impacts related to noise and no mitigation measures would be required. The No Tier II Alternative would not result in short- or long-term impacts to noise. Like Tier II of the recommended project, this alternative would result in cumulatively considerable impacts related to Tier I of the recommended project only. Since there would be no impacts to noise with the No Tier II Alternative, implementation of measures Noise-1 through Noise-4 specified for Tier II the recommended project would not be required to reduce the anticipated impacts to below the level of significance.

- Population and Housing

  Tier I - Like the recommended project, Tier I of the No Tier II Alternative would not have the potential to result in significant impacts to population and housing. Like the recommended project, this alternative would not be expected to result in impacts related to population and housing. Like the recommended project, this alternative would include a Tier I element but it would not include Tier II development, which

entails a residential component. Although the Tier I components of the alternative would address the existing needs of the population, this alternative would not contribute to regional housing and employment goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area), as discussed in Section 3.9 of this EIR for Tier II of the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to population and housing with this alternative, and no mitigation measures would be required. Impacts related to population and housing would be expected to be less than significant.

Tier II - As with Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to population and housing. The No Tier II Alternative would not assist in meeting regional housing and employment goals. Under the No Tier II Alternative, potential changes related to population and housing would not occur. This alternative would not result in any residential development or more intensive development associated with the medical, commercial or retail uses under the recommended project. Even though potential impacts resulting from Tier II of the recommended project would not be considered significant, the No Tier II Alternative's impacts to population and housing would be less than the recommended project because no change, such as the 100 unit residential component, would be implemented. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. However, the No Tier II Alternative would not contribute to the regional housing goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). As with Tier II of the recommended project, there would be no impacts to population and housing with the No Tier II Alternative, and no mitigation measures would be required. Impacts related to population and housing would be expected to be less than significant.

- Public Services

  Tier I - Like the recommended project, Tier I of the No Tier II Alternative would not have the potential to result in significant impacts to public services. As with Tier I of the recommended project as described in Section 3.11 of this EIR, the No Tier II Alternative would not result in impacts related to public services. This alternative would not require the development of residential units. Unlike the recommended project, there would be no Tier II development. There would not be an increase in the need for additional fire protection, police protection, parks, schools, and other public services, like the recommended project. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. However, this alternative would not contribute to regional housing and employment goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area) as discussed for Tier II of the recommended project. However, like the recommended project, this alternative would not result in significant impacts related to public services and no mitigation measures would be required. Impacts related to public services would be expected to be less than significant.

  Tier II - As with Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to public services. The No Tier II Alternative would not result in the need for additional fire protection, police protection, schools, parks, and other public services. Section 3.10 of this EIR provides

a discussion of the potential impact to public services related to Tier II of the recommended project. Like Tier II of the recommended project, the No Tier II Alternative would not create a significant net increase in public services and would require the implementation of the mitigation measures. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to public services with the No Tier II Alternative, and no mitigation measures would be required. Impacts related to public services would be expected to be less than significant.

- Recreation

  Tier I - Like the recommended project, Tier I of the No Tier II Alternative would not have the potential to result in significant impacts to recreation. Under the No Tier II Alternative, Tier I of the recommended project would be developed as discussed in Section 3.10 of this EIR, but Tier II building components would not be constructed. The No Tier II Alternative would result in no residential units built. Like the recommended project, this alternative would not be expected to result in impacts related to recreation. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, there would be no impacts to recreation with this alternative, and no mitigation measures would be required. Impacts related to recreation would be expected to be less than significant.

  Tier II - As with Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to recreation. The No Tier II Alternative would not result in impacts to parks and recreational facilities. The No Tier II Alternative would also not create an additional demand for the County's parks. Tier II of the recommended project would not result in significant impacts to existing parks or recreational facilities given the limited number of residential units recommended under Tier II and the availability and location of existing recreational facilities. Like Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the recommended project, there would be no impacts to recreation with the No Tier II Alternative, and no mitigation measures would be required. Impacts related to recreation would be expected to be less than significant.

- Transportation and Traffic

  Tier I - Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in significant impacts to transportation and traffic. The No Tier II Alternative would result in a smaller development scenario than that of the recommended development components of Tier II for the recommended project. The total development under this alternative would be significantly less than that of the recommended project, as it would only entail Tier I of the recommended project and would generate substantially fewer traffic trips given the reduced development. Construction-related Tier I impacts would occur as discussed in Section 3.12, Transportation and Traffic, of this EIR, and the Tier I mitigation measures would be required. Tier I trip generation for Tier I of this alternative would be the same as that of the Tier I of the recommended project. Tier I would result in 2,586 daily trips of which

176 trips would occur in the morning peak hour and 179 trips would occur in the evening peak hour. Since Tier I also involves removal of existing uses, a net reduction in trips of approximately 4,905 daily trips, 332 AM trips, and 338 PM trips would occur. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. As with the recommended project, implementation of measure Traffic-1 specified for Tier I of the recommended project would be required to reduce the anticipated impacts to below the level of significance.

Tier II - As with Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to recreation. The No Tier II Alternative would not result in impacts to parks and recreational facilities. The No Tier II Alternative would also not create an additional demand for the County's parks. Tier II of the recommended project would not result in significant impacts to existing parks or recreational facilities given the limited number of residential units recommended under Tier II and the availability and location of existing recreational facilities. Since this alternative would not contain Tier II development but involves vacation of existing buildings, this alternative would result in fewer trips than that projected for the recommended project. This alternative would result in the net reduction of trips on the street system since it would not generate any net new trips. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no Tier II impacts to transportation and traffic with the No Tier II Alternative, implementation of measures Traffic-1 though Traffic-3 specified for Tier II of the recommended project would not be required to reduce the anticipated impacts to below the level of significance.

- Utilities and Service Systems

  Tier I - Like the recommended project, Tier I of the No Tier II Alternative would have the potential to result in significant impacts to utilities and service systems. The No Tier II Alternative would result in greater impacts that are comparable to Tier I of the recommended project as discussed in Section 3.13, Utilities and Service Systems, of this EIR. However, the impacts from Tier II development would be avoided as this alternative would not entail additional development recommended in the Tier II components (i.e., no residential, retail, commercial uses, etc). The total development under this alternative would be less than that of the recommended project; therefore, this alternative would result in less demand on water supply, wastewater treatment facilities, landfills, and recycling facilities. Like Tier I of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no Tier II impacts to utilities and service systems with the No Tier II Alternative, implementation of mitigation measures specified for Tier II of the recommended project would not be required to reduce the anticipated impacts to below the level of significance.

  Tier II - Unlike Tier II of the recommended project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to utilities and service systems. The No Tier II (in Tier I) Alternative avoids potential impacts to utilities and service systems that could result from the implementation of Tier II of the recommended project. The No Tier II Alternative would not result in the short- or long-

term construction and operation impacts that would occur as a result of the recommended project. Unlike the recommended project, this alternative would entail no additional construction of buildings and would not require additional use of existing infrastructure (i.e., sewer, water, etc.). With the No Tier II Alternative, mitigation measures would not be required. Unlike Tier II of the recommended project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to utilities and service systems with the No Tier II Alternative, implementation of Measures Utilities-1 through Utilitites-2 specified for Tier II of the recommended project would not be required to reduce the anticipated impacts to below the level of significance.

Feasibility: This alternative is considered infeasible.

Facts: The above feasibility finding is based on the following:

- The No Tier II Alternative would be capable of meeting all Tier I objectives identified by the County, but would not meet any of the Tier II objectives.
- Alternative 5 would not meet the campus-wide objectives and the improvements and development would occur but the shifts would make this alternative infeasible.

SECTION VI
FINDINGS REGARDING MITIGATION MONITORING PROGRAM

VI.A REQUIREMENTS OF MITIGATION MONITORING PROGRAM

According to Section 21081.6 of the Public Resources Code, the California Environmental Quality Act requires that when a public agency is making the findings required by Sections 21081, the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted to mitigate or avoid significant effects on the environment.

The County of Los Angeles (County) through its governing Board of Supervisors hereby finds that the Mitigation Monitoring Program meets the requirements of Section 21081.6 of the Public Resources Code by providing a monitoring program designed to ensure compliance during project implementation with mitigation measures adopted by the County.

SECTION VII
FINDINGS REGARDING LOCATION AND CUSTODIAN OF DOCUMENTS

VII.A LOCATION AND CUSTODIAN OF DOCUMENTS

Section 15091(e) of the California Code of Regulations, California Environmental Quality Act Guidelines requires the public agency to specify the location and custodian of the documents or other materials that constitute the record of proceedings upon which the decision is based. Section 11.0 of the Environmental Impact Report (EIR) contains a list of all references used in the preparation of the environmental analysis. Unless otherwise noted, reference materials are located at the County of Los Angeles, Chief Executive Office, which shall also serve as the custodian of the documents constituting the record of proceedings upon which the County Board of Supervisors, the governing board for the County, has based its decision related to the project. The designated location and custodian of documents is as follows:

County of Los Angeles
Chief Executive Office
Kenneth Hahn Hall of Administration
Attention: Ms. Sabra White
500 West Temple Street, Room 754
Los Angeles, California 90012
E-mail: swhite@ceo.lacounty.gov

References associated with the EIR, and technical analysis related to the EIR for this project that are not available from the County of Los Angeles, Chief Executive Office are located at Sapphos Environmental, Inc. by contacting:

Sapphos Environmental, Inc.
Ms. Eimon Raoof
430 North Halstead Street
Pasadena, California 91107
Phone: (626) 683-3547
E-mail: eraoof@sapphosenvironmental.com

SECTION VIII
CERTIFICATION REGARDING INDEPENDENT JUDGMENT

Pursuant to Section 21082.1(c) of the Public Resources Code, the County of Los Angeles (County) certifies that the County Board of Supervisors, as the governing board for the County, has independently reviewed and analyzed the Final Environmental Impact Report (EIR) on behalf of the County. The County Chief Executive Office reviewed the Draft EIR and supporting technical appendices and required changes to those documents prior to circulation for public review. The Draft EIR circulated for public review reflected the independent judgment of the County. The Final EIR similarly has been subject to review and revision by the County Chief Executive Office staff and reflects the independent judgment of the County.

SECTION IX
STATEMENT OF OVERRIDING CONSIDERATIONS

Section 15093 of State CEQA Guidelines allows for overriding considerations where "economic, legal, social, technological or other benefits, including region-wide or statewide environmental benefits" outweigh the unavoidable environmental impacts, or unavoidable significant adverse effects, of the recommended project. In accordance with this CEQA guidance for overriding considerations, the County of Los Angeles (County) Board of Supervisors, as the governing board for the County, finds that for this recommended project the social and community relevance, economic potential, educational opportunities, sustainable facilities, and health care needs related benefits of the project outweigh the unavoidable adverse environmental impacts. The Final Environmental Impact Report (EIR) identified and evaluated impacts to: aesthetic resources, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, recreation, traffic and transportation and utilities and services systems, that were determined in the Initial Study to have the potential to result from implementing the Martin Luther King, Jr. Medical Center Campus Redevelopment project (project). The Final EIR determined that Tier I of the project would be expected to result in less than significant impacts related to: population and housing, public services, recreation, and utilities and service systems. Tier II of the project was expected to result in less than significant impacts to population and housing, public services, and recreation. With the implementation of the mitigation measures specified in the Final EIR, Tier I impacts to aesthetic resources, air quality, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and transportation and traffic, would be mitigated to below the level of significance. Tier II impacts to aesthetic resources, geology and soils, hazards and hazardous materials, hydrology and water quality, transportation and traffic, and utilities and services systems would be mitigated to below the level of significance with the implementation of the mitigation measures specified in the Final EIR.

IX.A UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS

The EIR determined that Tier I of the project is expected to result in significant unavoidable impacts with regard to greenhouse gas emissions and construction noise.

The EIR determined that the project would be expected to result in significant unavoidable impacts to air quality, cultural resources, greenhouse gas emissions, and noise.

Air Quality

Tier II

Section 3.02, *Air Quality,* of the Final EIR identified and evaluated the anticipated Tier II significant impacts related to air quality. Implementation of mitigation measures Air-1 to Air-11 would be expected to reduce significant air quality impacts with regard to air emission standards, sensitive receptors, and cumulative impacts during construction and operation of the project to the maximum extent feasible. Specifically each of these: air emission standards, sensitive receptors, and cumulative impacts would remain significant adverse impacts.

Cultural Resources

Tier II

Section 3.03, *Cultural Resources,* of the Final EIR identified and evaluated the anticipated Tier II significant impacts related to cultural resources. Implementation of mitigation measures Cultural-1 to Cultural-5 would be expected to reduce significant impacts related to the alternation or removal of structures or character-defining features that may be identified as historic resources; as well as the excavation of undisturbed soils that may result in the discovery of paleontological resources or human remains during construction of the project to the maximum extent feasible. However, these impacts would still remain significant adverse impacts.

Greenhouse Gas Emissions

Tier I

Section 3.05, *Greenhouse Gas Emissions*, of the Final EIR identified and evaluated the anticipated Tier I significant impacts related to greenhouse gas emissions. Implementation of mitigation measure GHG-1 would be expected to reduce significant direct, indirect, and cumulative impacts to greenhouse gas emissions to the maximum extent feasible, in terms of construction related emissions. However, the construction related emissions would still remain a significant adverse impact.

Tier II

Section 3.05, *Greenhouse Gas Emissions*, of the Final EIR identified and evaluated the anticipated Tier II significant impacts related to greenhouse gas emissions. Implementation of mitigation measure GHG-1 would be expected to reduce significant direct, indirect, and cumulative impacts to greenhouse gas emissions to the maximum extent feasible, in terms of construction related emissions. However, the construction related emissions would still remain a significant adverse impact.

Noise

Tier I

Section 3.08, *Noise*, of the Final EIR identified and evaluated the anticipated Tier I significant impacts related to greenhouse gas emissions. Implementation of mitigation measures Noise-1 to Noise-4 would be expected to reduce significant temporary increases in ambient noise levels that would exceed the established thresholds during construction of the project to the maximum extent feasible. However, the noise related impacts would still remain a significant adverse impact.

Tier II

Section 3.08, *Noise*, of the Final EIR identified and evaluated the anticipated Tier II significant impacts related to greenhouse gas emissions. Implementation of mitigation measures Noise-1 to Noise-4 would be expected to reduce significant temporary increases in ambient noise levels that would exceed the established thresholds during construction of the project to the maximum extent feasible. However, the noise related impacts would still remain a significant adverse impact.

IX.B OVERRIDING CONSIDERATIONS

The County Board of Supervisors determined that the social and community relevance, economic potential, educational opportunities, sustainable facilities, and health care needs related benefits of implementing the project, when balanced against all adverse effects, outweigh and override the unavoidable adverse effects of the project and cause those effects remaining after mitigation to be acceptable due to several considerations. Furthermore, the project offers significant opportunities and benefits that are not currently accessible or available in the surrounding community.

Social and Community Relevance

The project would provide the community and future generations with an opportunity to reflect on and to learn about the cultural significance of the site through the architecture, campus designs, and programming. It is the County's intent to incorporate a presentation of relevant historic figures such as Martin Luther King, Jr. the namesake of the campus; culturally relevant architects; and through portraying defining moments in the history of this Country, such as the Civil Rights Movement through displays and artwork installed throughout the campus.

The site would encourage the value in the community history, traditions, celebrations and cultural practices located in this community to gather at a central location to share, learn, and grow in a positive environment.

The project provides services to individuals in the central and southern area of the County, as well as to the neighboring communities and cities of Lynwood, Compton, and Los Angeles. As previously discussed, the project would offer social programs (such as health care services, family resources, and health seminars) to accommodate at the needs of the community. The programming at the site would encourage positive social and health related opportunities to this diverse community. The programming would further encourage positive interactions and healthy, productive lifestyles for all individuals accessing the hospital.

Economic Potential

The project would provide the potential for jobs and business development that could stimulate stability and growth in an economically challenged neighborhood. As discussed in the Final EIR, the community surrounding the project site is growing which is in line with the projected housing and populations projected by the Southern California Association of Governments (SCAG). The project area is located in a SCAG Compass Blueprint 2% Strategy area. This designation is provided to encourage growth and sustainable communities by locating new housing near existing jobs and new jobs near existing housing; creating a mix of uses; promoting redevelopment; and focusing growth along major transportation corridors, near a major transit station, with a variety of travel choices. This designation encourages development in identified areas throughout the county.

Programming at the facility would be developed to target the economic needs of the community by providing heath care research (as was once associated with the campus) and training as well as providing opportunities for other professional development classes, workshops, and the potential for business development. The project would create new jobs in the community during construction and throughout the operation and maintenance of the center. Development in Tier II would allow for mixed-use development, including retail, office, and employee residential facilities that satisfy a demand in the area and also provide for a more sustainable development where some employees could live, work and shop on one site, reducing the need for commuting. Further the modern and

sustainable development of campus improvements would replace outdated facilities with state-of-the-art facilities which would also contribute to and highlight the aesthetics of the campus and encourage additional and similar improvements and reinvestments in existing development on neighboring lots and in the area surround the project site.

Educational Opportunities

The project would present educational opportunities for business professionals as well as professionals in the health care field that are expected to support the community surrounding the project site. As discussed in the Final EIR, in recent years, there have been increases in both these fields. The project would have the ability to provide educational programming and services (i.e., research and training, workshops, seminars, business development opportunities) that are specifically designed to respond to the needs of the labor force at the hospital facility.

It is anticipated that the educational programming available at the facility would be developed to the needs and specification of the individuals working at and accessing the facility. The educational prospects and professional growth of these individuals would be enhanced by the opportunities available at the campus.

Sustainable Facilities

The project would consist of a sustainable facility that reflects the requirements of the Countywide Energy and Environmental Policy. As discussed in the EIR, development of the new MACC Building and the Ancillary Building under Tier I of the proposed project are currently registered with the U.S. Green Building Council under LEED for New Construction (LEED-NC) and the County requires that all new County buildings (greater than 10,000 square feet) under the County's Capital Project Program, which includes capital improvement and development projects, shall be Leadership in Energy and Environmental Design (LEED) certified at the silver level.

The project would implement environmentally sustainable practices during construction and throughout the life of the project. The environmental values embodied in this project reflect the County's commitment to sustainable development throughout the County and would serve to shape the environmental education process for the County by exposing residents to the project and to its benefits.

Health Care Needs

The project would provide health care services and programs that are responsive to the health and medical needs of the community. As discussed in the Final EIR, it is the goal of this project to establish the campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce development, academic research and teaching, and economic development that is responsive to the community needs.

It is understood that the programming at the campus would continue to develop in response to the health care needs of the community as funds and opportunities become available.

IX.C OVERRIDING CONSIDERATIONS FOR UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS

The project is consistent with the County's commitment to enrich lives through effective and caring service by being responsive to the needs of its residents and neighbors by providing quality health care service to its diverse community. The social and community relevance, economic potential, educational opportunities, sustainable facilities, and health care needs related benefits of the project, as discussed above, outweigh and override the unavoidable impacts related to greenhouse gas emissions and noise for Tier I of the project as well as the air quality, cultural resources, greenhouse gas emissions, and noise for Tier II of the project.

Air Quality

Tier II

The social and community relevance, economic potential, educational opportunities, sustainable facilities, and health care needs related benefits achieved through development of the project associated with the opportunities and services for residents of the County and the surrounding areas override the air quality standards, sensitive receptor, and cumulative impacts associated with air quality during construction and operation of the project. The air quality standards and levels may be exceeded temporarily construction and periodically during operation of the project. The project specifies mitigation measures Air-1 to Air-9 to reduce these Tier II impacts to the maximum extent possible, however, these impacts remain significant after the implementation of mitigation. The air quality significant impacts are overridden by the project's ability to provide new campus improvements and to reopen a fully functional medical campus that meets the community needs for quality health care and establishes the Martin Luther King, Jr. Medical Center Campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce development, academic research and teaching, and economic development.

Cultural Resources

Tier II

The social and community relevance, economic potential, educational opportunities, sustainable facilities, and health care needs related benefits achieved through development of the project associated with the opportunities and services for residents of the County and the surrounding areas override the potential construction related activities, which may include excavation, and the removal of historic resources related impacts associated with cultural resources. The project may result in impacts from the significant alternation or removal of structures or character-defining features that may be identified as historic resources; as well as the excavation of undisturbed soils that may result in the discovery of paleontological resources or human remains during construction of the project. The project specifies mitigation measures Cultural-1 to Cultural-5 reduce these Tier II impacts to the maximum extent possible, however, these impacts remains significant after the implementation of mitigation. The cultural resources significant impacts are overridden by the project's ability to provide new campus improvements and to reopen a fully functional medical campus that meets the community needs for quality health care and establishes the Martin Luther King, Jr. Medical Center Campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce development, academic research and teaching, and economic development.

Greenhouse Gas Emissions

Tier I

The social and community relevance, economic potential, educational opportunities, sustainable facilities, and health care needs related benefits achieved through development of the project associated with the opportunities and services for residents of the County and the surrounding areas override the construction related impacts associated with greenhouse gas emissions. The temporary greenhouse gas emissions levels would exceed the established thresholds during construction of the project. The project specifies mitigation measure GHG-1 to reduce this Tier I impact to the maximum extent possible, however, this impact remains significant after the implementation of mitigation. The greenhouse gas emissions significant impact is overridden by the project's ability to provide new campus improvements and to reopen a fully functional medical campus that meets the community needs for quality health care and establishes the Martin Luther King, Jr. Medical Center Campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce development, academic research and teaching, and economic development.

Tier II

The social and community relevance, economic potential, educational opportunities, sustainable facilities, and health care needs related benefits achieved through development of the project associated with the opportunities and services for residents of the County and the surrounding areas override the construction related impacts associated with greenhouse gas emissions. The temporary greenhouse gas emissions levels would exceed the established thresholds during construction of the project. The project specifies mitigation measure GHG-1 to reduce this Tier II impact to the maximum extent possible, however, this impact remains significant after the implementation of mitigation. The greenhouse gas emissions significant impact is overridden by the project's ability to provide new campus improvements and to reopen a fully functional medical campus that meets the community needs for quality health care and establishes the Martin Luther King, Jr. Medical Center Campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce development, academic research and teaching, and economic development.

Noise

Tier I

The social and community relevance, economic potential, educational opportunities, sustainable facilities, and health care needs related benefits achieved through development of the project associated with the opportunities and services for residents of the County and the surrounding areas override the construction related impacts associated with ambient noise levels. The temporary increase in ambient noise levels would exceed the established thresholds during construction of the project. The project specifies mitigation measures Noise-1 to Noise-4 to reduce this Tier I impact to the maximum extent possible, however, this impact remains significant after the implementation of mitigation. The noise significant impact is overridden by the project's ability to provide new campus improvements and to reopen a fully functional medical campus that meets the community needs for quality health care and establishes the Martin Luther King, Jr. Medical Center Campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce development, academic research and teaching, and economic development.

Tier II

The social and community relevance, economic potential, educational opportunities, sustainable facilities, and health care needs related benefits achieved through development of the project associated with the opportunities and services for residents of the County and the surrounding areas override the construction related impacts associated with ambient noise levels. The temporary increase in ambient noise levels would exceed the established thresholds during construction of the project. The project specifies mitigation measures Noise-1 to Noise-4 to reduce this Tier II impact to the maximum extent possible, however, this impact remains significant after the implementation of mitigation. The noise significant impact is overridden by the project's ability to provide new campus improvements and to reopen a fully functional medical campus that meets the community needs for quality health care and establishes the Martin Luther King, Jr. Medical Center Campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce development, academic research and teaching, and economic development.

SECTION X
SECTION 15091 FINDINGS

Based on the foregoing findings and the information contained in the record, the County of Los Angeles (County) Board of Supervisors has made the following findings with respect to the significant impacts on the environment resulting from the Martin Luther King, Jr. Medical Center Campus Redevelopment project pursuant to Section 15091 of the State California Environmental Quality Act (CEQA) Guidelines.

- Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effects as identified in the Final Environmental Impact Report (EIR).

- The changes and alterations are within the responsibility and jurisdiction of the County. The County Board of Supervisors, as the governing board for the County may designate the County Chief Executive Office, Department of Public Works, or other County departments to implement certain measures as part of pre-construction, construction, and post-construction activities. Pursuant to Section 15091(c) of the State CEQA Guidelines, the Mitigation Monitoring Program identifies responsible agencies for the mitigation measures.

- The mitigation measures identified in the Final EIR are feasible and will be required as conditions of approval.

Based on the foregoing findings and the substantial evidence contained in the record, and as conditioned by the foregoing findings:

- All significant effects on the environment due to the project have been eliminated or substantially lessened where feasible.

- Any remaining significant effects on the environment found to be unavoidable are acceptable due to the overriding concerns set forth in the foregoing Statement of Overriding Considerations.