CEQA ADDENDUM AND INITIAL STUDY/ENVIRONMENTAL CHECKLIST

for the

PROPOSED RESIDENTIAL CARE AND CHILDCARE FACILITIES PROJECT -

LAC+USC MEDICAL CENTER CAMPUS

LOS ANGELES, CALIFORNIA

Prepared at the Direction of

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

Lead Agency Pursuant to the California Environmental Quality Act

Prepared by

November 2017

ADDENDUM
TO THE
2014 LAC+USC MEDICAL CENTER CAMPUS MASTER PLAN EIR

The County of Los Angeles has determined that none of the conditions described in Sections 16162 and 15163 of the State CEQA Guidelines have occurred and therefore this Addendum to the 2014 Program Environmental Impact Report (EIR) for the LAC+USC Medical Center Campus Master Plan has been prepared for the proposed project described below.

Background and History:

In November of 2014, the Los Angeles County Board of Supervisors certified the Program EIR for the LAC+USC Medical Center Campus Master Plan (2014 project) pursuant to Section 15090 of the State CEQA Guidelines, made Findings for each of the significant effects identified in the EIR and adopted a mitigation and monitoring reporting program pursuant to Section 15091, determined in a statement of overriding considerations that the project benefits outweigh the project's unavoidable adverse environmental impacts, and approved the project (i.e., LAC+USC Medical Center Campus Master Plan) pursuant to Sections 15092 and 15093 of the State CEQA Guidelines. A Notice of Determination for the 2014 project and EIR was filed with the County Clerk and State Clearinghouse on November 19, 2014 and November 20, 2014, respectively.

In 2017, in response to Department of Health Services initiatives and County Board of Supervisor motions targeted at addressing the social and medical needs of the homeless and most vulnerable populations in the County, the County proposed the development of new recuperative care and crisis residential treatment program facilities on the LAC+USC Medical Center Campus and other changes to the 2014 Master Plan.

In November of 2017, an Initial Study/Environmental Checklist (see attached) was prepared pursuant to Section 15168 of the State CEQA Guidelines to evaluate the proposed project (i.e., proposed new facilities and other changes to the 2014 Master Plan, aka 2017 Changes to 2014 Master Plan) and to determine if revisions to the 2014 EIR and preparation of a Subsequent or Supplemental EIR or Mitigated Negative Declaration would be required due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Proposed Project:

The proposed project includes three new facilities that would be developed on the LAC+USC Medical Center Campus that were not previously included in the 2014 Master Plan and EIR: 1) a 96-bed recuperative care facility, 2) a 64-bed crisis residential treatment program facility, and 3) a new childcare facility. In addition, the proposed project includes two other changes to the 2014 Master Pan: 1) relocation of the proposed new central utility plant from a site south of Zonal Avenue to a site just to the southwest, and 2) a 20% reduction in the 635,000 square feet of research and development space that was projected to occur under the 2014 Master Plan. These new facilities and proposed changes to the 2014 Master Plan are described in greater detail in the attached Initial Study/Environmental Checklist.

Evaluation of Proposed Project/CEQA Determinations:

Section 15168 (Program EIR), subsection (c) of the State CEQA Guidelines states that "subsequent activities in the program must be evaluated in the light of the Program EIR to determine whether an additional environmental document must be prepared." If the new activities have the potential to result in effects that were not examined in the Program EIR, a new Initial Study needs to be prepared. If the lead agency finds that, pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new, environmental document would be required. Accordingly, the attached Initial Study/Environmental Checklist evaluates the potential environmental effects of the proposed project (i.e., changes to the 2014 Master Plan). Specifically, the Initial Study/Environmental Checklist summarizes the findings of the 2014 Master Plan EIR for each impact category and then describes whether the proposed changes to the 2014 Master Plan would result in new or substantially more severe significant impacts than those identified in the 2014 EIR.

Based on the results of the Initial Study/Environmental Checklist, the County has determined that the proposed project would not result in new significant impacts or substantially more severe significant impacts than those described in the 2014 EIR. Additionally, there are no mitigation measures or alternatives identified in the 2014 EIR that have now been identified as infeasible, and there are no mitigation measures or alternatives that were previously identified as infeasible and are now feasible, but have been rejected by the County.

The County has also determined that the proposed project changes to the 2014 Master Plan, which include residential care and childcare facilities to meet community medical and social needs, are consistent with the following goals of the Master Plan as identified in the 2014 EIR:

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

Therefore, the County has determined that none of the following conditions that would require preparation of a Subsequent or Supplemental EIR pursuant to Sections 15162 and 15163 of the State CEQA Guidelines would apply to the proposed project (i.e., the 2017 changes to the 2014 Master Plan):

1. Substantial changes are proposed in the project, which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions to the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;
    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternative; or
    d. Mitigation measures or alternatives, which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

Given none of the conditions above apply to the proposed project, pursuant to Section 15164 of the State CEQA Guidelines (Addendum to an EIR or Negative Declaration), the County has prepared this Addendum to the 2014 Program EIR.

Furthermore, pursuant to Section 15168 (e), the County of Los Angeles has determined that:

1) The proposed project (i.e., changes to the 2014 Master Plan) are within the scope of the Master Plan approved in November of 2014, and
2) The 2014 Program EIR for the Master Plan adequately described the activities for the purposes of CEQA.

Initial Study/Environmental Checklist

1. **Project Title:** Proposed Residential Care and Childcare Facilities - LAC+USC Medical Center Campus

2. **Lead Agency Name and Address:**
County of Los Angeles
by the Department of Public Works
900 South Fremont Avenue
Alhambra, California 91803

3. **Contact Person and Phone Number:**
Andrew Moey
Assistant Deputy Director
626-300-2300

4. **Project Location:**

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

5. **Project Sponsor's Name and Address:**

County of Los Angeles
900 South Fremont Avenue
Alhambra, California 91803

6. **General Plan Designation:**

Public Facilities (P)

7. **Zoning:**

Public Facilities (PF)

8. **Description of Project:**

In 2013, Los Angeles County (County), as the lead agency, prepared the LAC+USC Medical Center Campus Master Plan Report, which summarized the research, findings, observations, and proposals for master planning options at the LAC+USC Medical Center Campus and identified a preferred Master Plan option. In 2014, the County prepared an Initial Study (IS) and a Program Environmental Impact Report (EIR) for the project described below. The EIR was certified and the Master Plan was approved by the County in November of 2014. However, recent changes to components described in the 2014 Master Plan EIR and proposed new facilities not previously identified in the EIR, have necessitated this new IS/Environmental Checklist, pursuant to Section 15168(c) of the State CEQA Guidelines.

As stated in the 2014 EIR, the LAC+USC Master Plan Project consists of a Master Plan that would guide future development for a number of years and would influence the delivery of health care services and health related community programs. The goals of the Master Plan are to:

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

6. Plan for future program development

Development, as described in the 2014 Master Plan, would include construction of new and renovated medical-related, office, retail, open space, and parking uses and demolition of existing buildings and structures to accommodate new development.

Proposed Project Changes (aka, Proposed Project)

The proposed changes include the development of a Recuperative Care residential facility, Crisis Residential Treatment Program (CRTP) facility, new childcare center that would be constructed at one of two alternate locations within the western portion of the campus, and a proposed new location for the new central utility plant southwest of the location identified in the 2014 EIR. Additionally, the proposed changes include a 20% reduction in the projected 635,000 sf of research and development facilities identified in the 2014 Master Plan EIR.

The Recuperative Care building would be three stories and provide 96 beds on a site south of Zonal Avenue and west of N. State Street. The Recuperative Care facility would serve men and women who are discharged from the hospital and need a place to recuperate for periods up to 3 months. The Crisis Residential facility would be comprised of four separate two-story buildings that would each house 16 beds (64 beds total). CRTPs provide short-term intensive residential care for individuals ages 18 and over. The average stay would be 10 to 14 days, with a maximum stay not to exceed 30 days. CRTPs utilize a strengths-based, trauma-informed approach that supports and promotes the wellness and recovery of individuals in a safe, home-like setting. CRTPs provide short-term, recovery-based services and supports, including integrated services for co-occurring substance use disorders. Residents participate in the development of individualized plans that promote care in voluntary treatment settings and successful re-integration into the community. The Crisis Residential facility would be located adjacent to the proposed Recuperative Care facility. Parking for both centers would be in Lot 10, directly behind the former Women and Children's Hospital. As a result of these efforts, Trailer 30 and its associated trash compactor would need to be relocated. Figures 1 and 2 show the sites of the proposed new and relocated facilities. Proposed land uses identified in the 2014 Master Plan EIR and the proposed project changes to the adopted 2014 Master Plan that are evaluated in this Initial Study are summarized in Table 1 below.

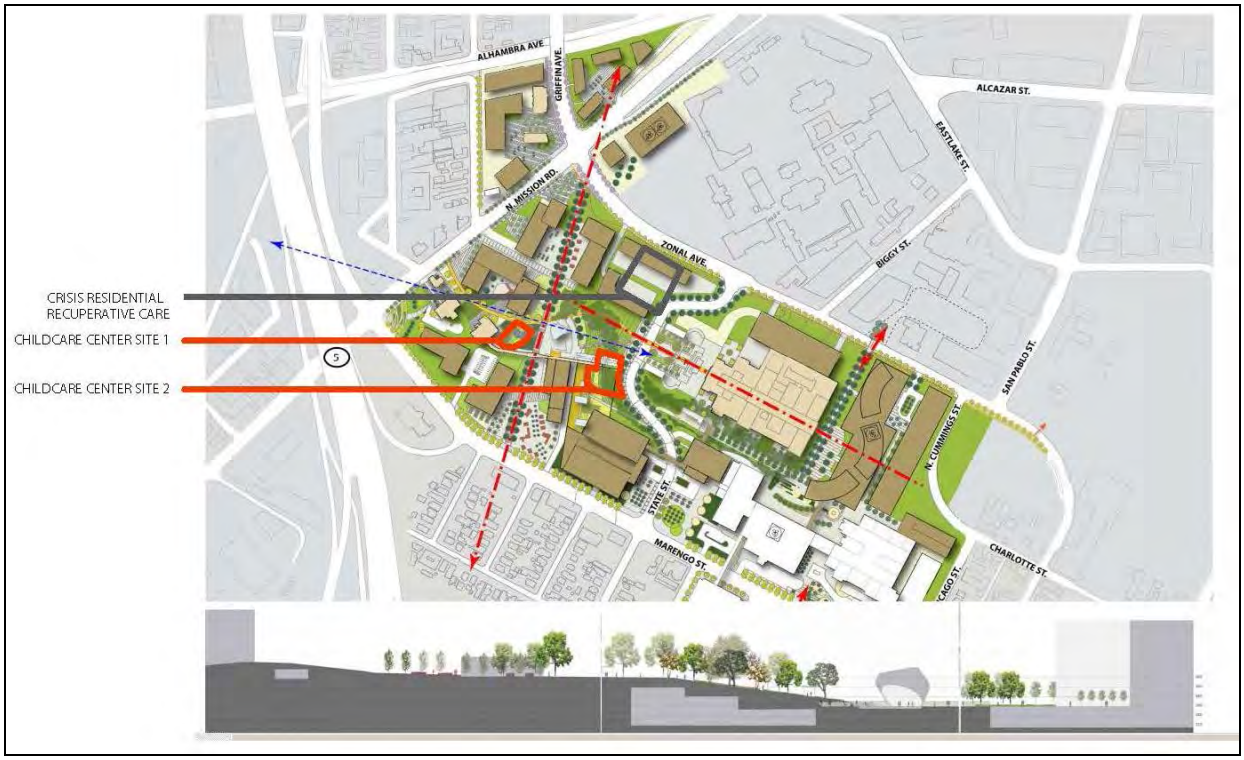


Figure 1 – Proposed Locations for the Crisis Residential and Recuperative Care Facilities and Childcare Facility

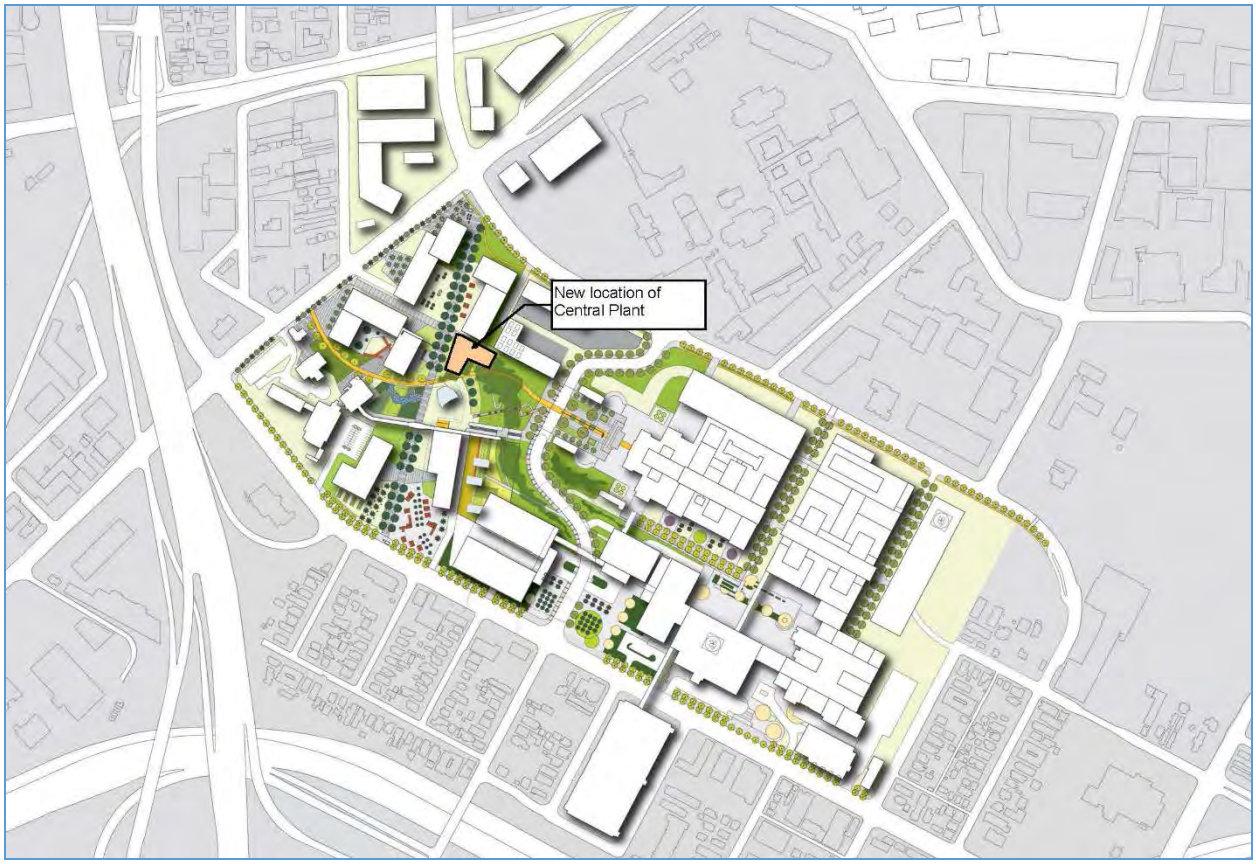


Figure 2 – Proposed Location of the Central Utility Plant

Table 1 – Master Plan (2014) Land Uses and Proposed Master Plan Changes (2017)

Land Use Categories	2014 Master Plan		Proposed 2017 Changes
	Existing Uses to be Removed (sf)	2014 Proposed Uses (sf)	
Wellness-Oriented Community and Childcare Facilities	N/A	85,000 sf of wellness-oriented meeting space and community-serving space 20,000 sf of wellness-oriented community retail space	A new 10,000-sf childcare facility, which would accommodate 84 children would be constructed in one of two alternate locations on the campus in place of the existing facility at the NW corner of the campus, which has a capacity of 72 children
New Utility Plant and Facilities	31,000 sf of maintenance facilities 20,938 sf of utility plant and cooling towers	40,000-sf utility plant and maintenance facility	The proposed new utility plant would be constructed south and west of the location identified in the 2014 EIR and south of proposed new biotech research buildings in the western half of the campus
Outpatient Clinics/ Laboratories/ Medical Offices	457,727 sf of outpatient clinics/laboratories/medical offices	200,000 sf of outpatient clinics/laboratories/medical offices	No change from 2014
Professional/ Administration Offices	197,288 sf of administrative office space	265,000 sf of professional and administrative office space	No change from 2014
Research and Development	N/A	635,000 sf of research and development space	Reduction from 635,000 to 508,000 sf in research and development space
Hospital Addition (Inpatient)	N/A	450 new hospital beds in three new 150-bed towers	No change from 2014
Warehouse/Storage	15,756 sf of warehouse and storage trailers	N/A	Trailer 30 and its associated trash compactor to be relocated
Residential Care Facilities	N/A	N/A	A new, 96-bed, 32,714-sf three-story recuperative care facility and a 64-bed, 37,628-sf, two-story crisis residential treatment program facility consisting of four 16-bed buildings would be constructed south of Zonal Ave. and west of N State St.
Total	**722,709 sf**	**1,245,000 sf and 450-bed hospital addition**	**Net reduction of 46,658 sf**

N/A – not applicable

Source: County of Los Angeles, 2017; LAC+USC Medical Center Campus Master Plan EIR.

2014 EIR - Environmental Factors Potentially Affected

The 2014 EIR determined that implementation of the Master Plan could result in significant or potentially significant impacts in the following areas:

☒ Aesthetics	☐ Agriculture and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Geology/Soils
☒ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials	☒ Hydrology/Water Quality
☒ Land Use/Planning	☐ Mineral Resources	☒ Noise
☒ Population/Housing	☒ Public Services	☒ Recreation
☒ Transportation/Traffic	☒ Utilities/Service Systems	☒ Mandatory Findings of Significance

2017 Project Changes - Environmental Factors Potentially Affected

The proposed project (i.e., 2017 changes to the 2014 Master Plan) could result in the following new impacts that were not identified in the 2014 EIR.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology/Soils
☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials	☐ Hydrology/Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☐ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☐ Utilities/Service Systems	☐ Mandatory Findings of Significance

Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have an impact on the environment that is "potentially significant" or "potentially significant unless mitigated" but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards and (2) has been addressed by mitigation measures based on the earlier analysis, as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☒ I find that although the proposed project could have a significant effect on the environment, all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT, including revisions or mitigation measures that are imposed upon the project.

Signature	Date
	County of Los Angeles Department of Public Works
Printed Name	For

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved and the findings of the prior EIR, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational, impacts.
3. Once the lead agency has determined that a particular physical impact may occur as a result of the supplemental activity, the checklist answers must indicate whether the impact is a new impact not analyzed in the prior EIR, or an impact that is substantially more severe than disclosed in the prior EIR. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, a supplemental environmental impact report (EIR) is required.
4. "Negative Declaration: Less than Significant with Mitigation Incorporated" applies when the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to a "Less-than-Significant Impact." The lead agency must describe the mitigation measures and briefly

explain how they reduce the effect to a less-than-significant level. (Mitigation measures from the "Earlier Analyses" section may be cross-referenced.)

5. Earlier analyses may be used if, pursuant to tiering, program EIR, or other California Environmental Quality Act (CEQA) processes, an effect has been adequately analyzed in an earlier EIR or negative declaration [Section 15063(c)(3)(D)]. In this case, a brief discussion should identify the following:
   a. *Earlier Analysis Used*. Identify and state where earlier analyses are available for review.
   b. *Impacts Adequately Addressed*. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c. *Mitigation Measures*. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.
7. *Supporting Information Sources*: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to a less-than-significant level.

I.	**2014 EIR Impact Determination for AESTHETICS –** Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?	☒	☐	☐	☐
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

2014 EIR Impact Discussion

a) The 2014 EIR identified no designated scenic highways, corridors, or parkways within the project viewshed, and no recognized scenic vistas were identified within the community; only informal views were identified in which views of the Old General Hospital Building, the Downtown skyline, and local foothill and mountain ridgelines can be acquired. Informal views from some locations on the campus may be obstructed by new buildings; however, no designated scenic vista or views would be obstructed or affected. New low-rise buildings would be added to the campus, consistent in scale and massing with existing buildings; new street trees, and extensive new park-like landscaped spaces would also be added in areas that are now paved and occupied by infrastructure. The Master Plan would not result in a significant adverse effect on a scenic vista.

b) The Master Plan project is not located within the vicinity of a designated State Scenic Highway (California Scenic Highways Mapping System). During construction, most of the mature trees and the architectural/historical resources on the campus would be preserved as part of the project. However, the Women's and Children's Hospital, which is a historic resource and aesthetically noteworthy because of its architectural design, would be demolished to accommodate future Master Plan development. Previously adopted mitigation measure MM-CR-3 (see discussion for V. 2014 EIR Impact Determination for Cultural Resources below) would partially mitigate project impacts to scenic resources, but demolition of the Women's and Children's Hospital building would remain a significant and unavoidable visual impact of the Master Plan.

c) The visual setting of the project site is characterized by a range from low to high visual quality, providing an often flexible urban design context for new development features. Temporary construction activities would not result in significant changes to visual character, nor would these result in a significant overall reduction in visual quality. New buildings would be generally compatible in architectural form, finishes and scale with existing campus buildings and because the project would preserve most of the significant architectural/historical resources within the campus, while adding extensive new landscape elements to create an inviting park-like setting for campus staff and visitors. Impacts would be less than significant. Nonetheless, previously adopted mitigation measure MM-AES-1 would protect elements of moderately high visual quality in the community, such as vantages within the campus that offer views of downtown

Los Angeles and the San Gabriel Mountains, as appropriate.

d) Both the project site and the surrounding area are in a fully urbanized setting in which there are numerous existing sources of light and glare. These include existing campus health services buildings and commercial buildings along adjoining streets. The net contribution of project construction activities, when considered in addition to existing sources of light and glare, would be negligible; and no significant project construction impacts related to light, glare, and shadow would occur. The Master Plan would introduce new buildings and parking areas and new shielded outdoor lighting features that would not significantly alter ambient illumination light levels, or result in significant spill light impacts on surrounding land uses. All project lighting features would be installed in accordance with applicable regulations designed to promote energy efficiency, avoid spill light and glare, and preserve nighttime sky viewing. In addition, project elements would be designed to be compatible with the design character of the setting in which they are being proposed, and would receive non-highly reflective finishes and colors. Therefore, the project would not produce significant light or glare impacts.

2104 Adopted Mitigation Measures

MM-AES-1: All new development proposed under the Master Plan shall be sited and designed to ensure that those views identified as important by the County are not obstructed.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No. See discussions below.

a) The proposed project changes include two new residential care facilities, a new childcare facility to replace the existing facility on the campus, a new location for the proposed Central Utility plant, and a 20% reduction in research and development space (see project description). These changes would not introduce new significant impacts related to scenic vistas, scenic highways, visual quality and character, or substantial light and glare. The two new residential care facilities (Crisis Residential Treatment Program and Recuperative Care Facility) would consist of four 3-story buildings and the Recuperative Care would be a single 3-story building, respectively. These new low-rise buildings would be generally compatible in architectural form, finishes, and scale with existing campus buildings. Additionally, previously adopted mitigation measure MM-AES-1 would still be applicable and the proposed location for the two new in-patient facilities, the two proposed alternate locations for the new childcare facility, and the relocated utility facility would not obstruct or otherwise affect a designated scenic vista or view. Near the proposed sites for the two residential care facilities and two proposed locations for the new childcare facility, the non-continuous character of the landscaping and the presence of obtrusive manmade elements (trailers, traffic lights and signs, and construction barricading) would continue to reduce the unity and intactness of the view, and the visual quality rating would remain moderately low as analyzed in the 2014 EIR. The new childcare facility and new location for the central utility plant would replace the existing facilities on the campus and would be compatible with the campus and surrounding uses. Proposed heights of the new childcare facility and new central utility plant would remain similar to existing conditions and what was proposed in the Master Plan. The 20% reduction in the 635,000 sf of new biotech research space identified in the 2014 Master Plan EIR to 508,000 sf would not result in any adverse changes related to aesthetic impacts.

b) The proposed project changes would not result in new impacts to any scenic or visual resources. Impacts to scenic resources would remain significant and unavoidable due to demolition of the historically significant Women's and Children's Hospital analysis. No new impacts have been identified, and no further analysis is warranted.

c) See the responses to a) and b) above.

d) The proposed project changes would still be located in an area that is entirely developed with County/public, residential, commercial, medical, and institutional facilities, consistent with the LAC+USC Medical Center Campus Master Plan, and would incorporate project lighting features that would be installed in accordance with applicable regulations designed to promote energy efficiency, avoid spill light and glare, and preserve nighttime sky viewing. Therefore, no new impacts would occur.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measure MM-AES-1 identified above would continue to apply to the proposed project.

II.	**2014 EIR Impact Determination for AGRICULTURE AND FOREST RESOURCES –** In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, and the forest carbon measures methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation		
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for or cause rezoning of forestland (as defined by Public Resources Code Section 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by U.S. Government Code Section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment that, because of their location or nature, could result in the conversion of farmland to nonagricultural use or the conversion of forestland to non-forest use?	☐	☐	☐	☒

2014 EIR Impact Discussion

The Initial Study prepared for the 2014 EIR determined that no impacts to agricultural resources would occur. The discussion below is from the 2014 Initial Study.

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

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

c) The project site is not zoned as forestland, timberland, or timberland zoned Timberland Production. The project site is currently developed and does not contain forestland or timberland. Therefore, the Master Plan would not conflict with existing zoning or cause rezoning of forest or timberland. Since the project would not affect

forestland or timberland, it would also not contribute to a cumulative impact with regard to conversion of forestland or timberland. No further analysis was warranted in the EIR.

d) The project site is not located on or near forestland. Therefore, the Master Plan would not result in the loss or conversion of forestland. Since the Master Plan would have no impact on forestland, it would also not contribute to a cumulative impact with regard to forestland conversion. No further analysis was warranted in the EIR.

e) The Master Plan would not convert farmland or forestland (see responses to Items II.a) and d), above). Since the Master Plan would not have a secondary impact with regard to farmland or forestland conversion, the project would also not contribute to a cumulative farmland or forestland conversion impact. No further analysis was warranted in the EIR.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No. The proposed project changes would not result in effects that were not previously examined or evaluated for agricultural resources.

a) The proposed project changes include two new residential care facilities, a new childcare facility to replace an existing one on the campus, a change in location for the proposed new central utility plant, and a 20% reduction in research and development space. These changes would all occur within the existing campus and Master Plan boundaries and therefore, would not introduce new or more severe impacts on agricultural resources. The proposed project changes would still be located in a developed urban area and would not conflict with existing zoning for agricultural uses or forestland. No new impacts have been identified, and no further analysis is warranted.

b) The project changes are not located on a site subject to a Williamson Act contract.

c) The locations of the project changes are not zoned as forestland, timberland, or timberland zoned Timberland Production. Also, see the response to a) above.

d) The project changes are not located on or near forestland and would not convert or result in the loss of forestland.

e) See the responses to a) through d) above.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

III.	**2014 EIR Impact Determination for AIR QUALITY –** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c)	Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is in nonattainment status under an applicable federal or state ambient air quality standard (this includes the release emissions the exceed quantitative thresholds for zone precursors)?	☐	☒	☐	☐
d)	Expose sensitive receptors to substantial pollutant concentrations.	☒	☐	☐	☐
e)	Create objectionable odors that would affect a substantial number of people?	☐	☐	☒	☐

2014 EIR Impact Discussion

a) The project would be consistent with the city's general plan and the goals of SCAG's RTP/SCS and the RCP (see Section 3.9, Land Use/ Planning of the 2014 EIR for more discussion). The project is considered consistent with the governing land use document, which is the City of Los Angeles General Plan. Furthermore, pursuant to SCAQMD guidelines, the Master Plan is considered consistent with the region's AQMP. As such, project-related emissions are accounted for in the AQMP, which has been crafted to bring the Basin into attainment status for all nonattainment pollutants and precursors thereof. Accordingly, the Master Plan would not conflict with or obstruct implementation of the applicable air quality plan. This impact is considered less than significant.

b) During construction, maximum daily project-related criteria pollutant emissions would exceed SCAQMD regional construction-period thresholds for VOC and NOX. Mitigation Measure AQ -1, which would require low-VOC coatings beyond SCAQMD requirements for non-residential uses, would reduce VOC emissions. Mitigation Measures AQ-2 and AQ-3, which would require a clean construction and diesel-reduction measures, would reduce NOx emissions from vehicle exhaust. Implementation of Mitigation Measures AQ -1 through AQ-3 would reduce emissions during project construction to below SCAQMD thresholds. Impacts are considered less than significant with mitigation incorporated. During operation, maximum daily project-related criteria pollutant emissions over existing conditions are not expected to exceed SCAQMD operations-period thresholds for any pollutant. Similarly, maximum daily project-related criteria pollutant emissions over future no-project conditions are not expected to exceed SCAQMD operations-period thresholds for any pollutant. Consequently, the impact of operations-related emissions from the project is considered less than significant.

c) As discussed above, criteria pollutant emissions are not expected to exceed SCAQMD regional thresholds during construction and operation of Master Plan development after mitigation relative to both existing and future no project conditions. Therefore, because the Master Plan would not exceed the thresholds for a nonattainment pollutant (in this case, an ozone precursor [VOC and NOX], PM10, PM2.5, or Pb), the Master Plan would not result in a net increase in pollutants (including ozone precursors) that would be cumulatively considerable. With implementation of mitigation measures MM-AQ-1 through MM-AQ-3, impacts would be less than significant.

d) Construction of Master Plan facilities and improvements alone is not anticipated to result in an elevated health risk to exposed persons because of the short-term nature of construction-related diesel exposure.

Localized emissions during construction are expected to exceed the appropriate Local Significance Thresholds (LSTs) for NOX, PM10, and PM2.5 before mitigation. Based on localized analysis that conservatively assumes maximum daily construction activities are concentrated in a one-acre area near offsite receptor locations, localized emissions during construction are expected to exceed the appropriate LSTs for NOX, PM10, and PM2.5 before mitigation. Measures MM-AQ-1 through MM-AQ-3 would mitigate localized construction impacts; however, potential emissions of PM2.5 and PM10 during construction would remain significant after mitigation. During operation, localized emissions during operations would not exceed LSTs for the project area relative to both existing and future no project conditions. Operations impacts would be less than significant. Construction of the Master Plan alone is not anticipated to result in an elevated health risk to exposed persons because of the short-term nature of construction-related diesel exposure.

Long-term operations would increase building square footage, which would increase the use of existing or introduction of new permitted sources on-site. Despite the increased use, health risk associated with Master Plan buildout is expected to remain below SCAQMD thresholds. Therefore, impacts related to potential project-generated exposure to toxic air contaminants (TACs) on surrounding land uses would be less than significant.

With respect to CO hot spots at nearby intersections, implementation of the Master Plan would create congested conditions at various intersections near the project site, but is not expected to result in violations of the state or federal 1- or 8 hour CO standards at the three most congested and heavily-trafficked intersections within the project vicinity. Consequently, the project would not cause or contribute to new air quality violations, worsen existing violations, or delay timely attainment of CO NAAQS. The impact of traffic from the project on ambient CO levels is considered less than significant. No mitigation is required.

e) Odors resulting from construction of Master Plan facilities and improvements are not likely to affect a substantial number of people because construction activities usually do not emit offensive odors. Given mandatory compliance with SCAQMD rules, no construction activities or materials are proposed that would create a significant level of objectionable odors. As such, potential impacts during short-term construction would be less than significant.

2014 Adopted Mitigation Measures

MM-AQ-1: To reduce VOC emissions during construction, the County (or its contractors) shall use low-VOC coatings that go beyond the requirements of SCAQMD Rule 1113 and have a VOC content of 10 g/L or less during construction.

MM-AQ-2: To reduce NOX emissions during construction, the County (or its contractors) shall ensure that all off-road diesel-powered equipment used during construction will be equipped with an EPA Tier 4 Interim engine, except for specialized construction equipment in which an EPA Tier 4 Interim engine is not available. The use of Tier 4 Interim engines will also act to reduce ROG and PM emissions from construction equipment.

MM-AQ-3: To reduce NOX and PM emissions during construction, the County (or its contractors) shall implement the following measures during construction.

- Haul and delivery truck idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to less than 3 minutes (beyond that required by the California airborne toxics control measure, 13 California Code of Regulations [CCR] 2485). Clear signage shall be provided for construction workers and construction vehicles at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- A traffic control plan shall be prepared.
- A carpool program for construction workers, including incentivizing carpooling as well as providing bus service for crew members, shall be implemented.
- Truck deliveries shall be consolidated when possible.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No. See discussions below.

a) The proposed changes would result in land uses that are consistent with those proposed in the 2014 Master Plan and are compatible with existing uses. As a consequence and because the proposed changes would result in less total square footage and fewer daily trips than the approved 2014 Master Plan, no new impacts or conflicts with the existing AQMP would occur.

b) The proposed project changes would result in a slight reduction in the projected amount of building square footage that could occur on the campus compared to the amount of future development identified in the 2014 EIR. That reduction would result in an estimated 406 fewer daily trips to and from the campus. As a consequence, construction and operational air quality impacts would be similar to or slightly less than the impacts described in the 2014 EIR.

c) The Master Plan changes would not result in a net increase in pollutants (including ozone precursors) beyond those identified in the 2014 EIR; therefore, the proposed changes would not result in new impacts that are cumulatively considerable. Also, see the responses to a) and b) above.

d) The proposed project changes would result in slightly less than or similar construction and operational pollutant emissions to those identified in the 2014 EIR. Therefore, the proposed project changes would not result in new or substantially more severe air quality impacts on sensitive receptors than those identified in the 2014 EIR.

e) The proposed project changes would not require construction equipment or materials that would result in substantially different odors than those identified in the 2014 EIR. Additionally, operation of the new residential care facilities are not expected to result in odors substantially different or greater than existing uses on the campus. Therefore, no new or substantially more severe significant impacts would occur.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measures MM-AQ-1 through MM-AQ-3 would continue to apply to the proposed project.

IV.	**2014 EIR Impact Determination for BIOLOGICAL RESOURCES –** Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c)	Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including marshes, vernal pools, coastal areas, etc.), through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e)	Conflict with any local policies or ordinances to protect biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f)	Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

2014 EIR Impact Discussion

a) There is some limited potential for several bat species, all considered California Species of Concern, to occur in the project site due to some limited foraging and roost potential. Though the likelihood is low, there is potential for roosting Western yellow bats to be present in palm trees on the project site. If individual development projects under the proposed Master Plan would require removal of palm trees or other potential roost sites, a potentially significant impact to CDFW species of concern could occur. Implementation of MM-BIO-1 would ensure that the potential impacts of construction activities on roosting bats would be reduced to less than significant.

There are no candidate, sensitive, or special-status animal or plant species on-site, with the exception of the two California black walnut trees that were identified on the project site or in its surroundings. If the two California black walnut trees remain on the site, it is not anticipated that operational activities would have an adverse impact on these trees. Operational activities on the campus, which would not differ significantly from current activities, are also not expected to result in significant impacts on bat species that may roost on the project site. Therefore, construction and operation of the facilities and buildings proposed under the Master Plan would not have an adverse impact on any candidate, sensitive, or special-status animal or plant species. Impacts associated with buildout of the Master Plan would be considered less than significant.

b) The project site is fully developed and does not contain areas with a riparian or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. No impacts to wetlands or natural communities would occur, and these issues were not carried forward for further analysis in the 2014 EIR.

Projects implemented under the Master Plan would be required to obtain and comply with a General Construction Permit through the State Water Resources Control Board. This permit and associated NPDES requirements include development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), with associated monitoring and reporting. Stormwater best management practices (BMPs) would be required to control erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. Additional source-control BMPs would also be required to prevent runoff contamination by potentially hazardous materials and eliminate non-stormwater discharges. Thus, no impacts to wetlands would occur.

c) See c) above.

d) The project site is located in an urban setting and is not considered to be critical to wildlife movement; there is no natural habitat on-site. Therefore, construction and operational activities proposed under the Master Plan would not pose substantial barriers or other impediments to wildlife movement. Impact would be less than significant.

Bird species that are protected under the MBTA have the potential to nest in the existing ornamental vegetation on the project site. Some bird species that are protected by the MBTA may also nest on existing buildings. Removal of vegetation and the demolition of buildings during construction could result in direct impacts on nests that are protected under the MBTA. Also, high noise levels and dust from construction activity could cause indirect impacts on nests and cause failure. Implementation of MM-BIO-1 and MM-BIO-2 would ensure that the potential impacts of construction activities on nesting birds that are protected under the MBTA and California Fish and Game Codes would be reduced to less than significant.

e) Construction of proposed Master Plan facilities and structures could result in damage to or removal of vegetation on the project site, including native oak trees that have been planted in ornamental areas. While coast live oak trees are not considered special-status plant species, these trees are protected under the Los Angeles County Oak Tree Ordinance. Protected trees include native oaks that measure 8 inches or more in diameter or oaks with multiple trunks, with a combined diameter of 12 inches or more for the largest two trunks measured 4.5 feet above the natural grade. Potential damage to or removal of oak trees that are protected by the Los Angeles County Oak Tree Ordinance would be a significant impact. Implementation of MM-BIO-3 would ensure that potential oak tree removal and resulting replanting per the County's tree protection ordinance, would result in less than significant impacts. Operation of facilities and buildings proposed under the Master Plan, including routine maintenance and pruning of ornamental vegetation and trees, is not expected to result in significant impacts.

f) No habitat or other conservation plans encompass the project site.

2014 Adopted Mitigation Measures

MM-BIO-1: To avoid impacts on roosting bats, preconstruction surveys shall be conducted prior to the on-set of work within the vicinity of vacant buildings and prior to tree removal. During surveys, biologists shall avoid unnecessary disturbance of potentially occupied roosts. Full-spectrum acoustic detectors shall be used during emergence surveys to assist in species identification. If it is determined that trees or structures in the project area are being used by bats as roost sites, the following protective measures shall be implemented:

- Disturbance of maternity roosting structures or trees (e.g., structure removal, construction equipment operation near roosts, tree trimming or removal) shall not occur during the maternity period (April 15 to September 15) to avoid impacts on reproductively active females and active maternity roosts (whether colonial or solitary). The maternity roost shall remain undisturbed from the time it is located until the following September 15 or until a qualified biologist has determined the roost is no longer active. No construction work shall occur at the roost or within a 100-foot-wide buffer zone (or an alternative width, as determined in consultation with CDFW) until September 15.
- Exclusion devices may be installed outside of the maternity period (September 16 to April 14) to preclude bats

from occupying buildings during, or prior to the on-set of, construction. Exclusionary devices shall be installed only by or under the supervision of an experienced bat biologist. Eviction of bats roosting in trees outside the maternity season shall be done in favorable weather under the supervision of a qualified bat biologist and adhering to the following two-step removal process:

- On Day 1, for trees with cavities, crevices, and exfoliating bark, and that are found to support roosting bats, Step 1 would be the removal of branches and limbs with no cavities. These limbs shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree, which may not have been detected during the preconstruction survey, will either abandon the roost immediately (rarely) or, after emergence, will avoid returning to the roost. For foliage roosting bats, Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. On Day 2, under the supervision of a qualified biological monitor familiar with the life history of subject bat species, the tree may be removed.
- Qualified biologists should search all downed roost trees for dead and injured bats. The presence of dead or injured bats that are species of special concern shall be reported to CDFW.

Non-maternity roost trees should ideally be removed or trimmed in the fall between September 16 and October 31. If the removal of non-maternity roost trees cannot be timed to occur within this period, tree trimming and removal of non-maternity roost trees shall be timed to avoid periods of inclement or unseasonably cold weather to avoid impacts on bats in torpor (a period of seasonal inactivity). In all circumstances, qualified biologists shall monitor non-maternity tree removal.

MM-BIO-2: The County shall avoid the nesting season for birds or conduct preconstruction nesting bird surveys if construction activities are carried out during the nesting season. To ensure compliance with the MBTA and similar provisions under Sections 1600–1616 of the California Fish and Game Code, the County of Los Angeles, through the general contractor, shall conduct all vegetation removal during the non-breeding season, between September 1 and February 14, or implement the following:

- If the removal of vegetation, demolition of buildings, or noise-generating construction activities are scheduled between February 15 and August 31, the County of Los Angeles Department of Public Works or the construction contractor shall retain a qualified biologist (i.e., experienced with conducting nesting bird surveys) who shall conduct a focused nesting bird survey prior to the start of vegetation removal, building demolition, or noise-generating activities within any potential nesting habitat (i.e., all vegetation, buildings, eaves on buildings, etc.). The size of the nesting bird survey area shall be determined by a qualified biologist at the time of the survey and include the entire limits of disturbance. It may also include a buffer area if deemed necessary by the biologist. The preconstruction nesting bird surveys shall be conducted no more than 7 days prior to initiation of vegetation removal, building demolition, or noise-generating construction activities. If no active nests are detected during these surveys, no restrictions on project activities shall be necessary.
- If active nests are found, a qualified biologist shall identify and flag an appropriate buffer around the nest, and no construction activities shall occur within the buffer until the qualified biologist has
- If active nests are found, a qualified biologist shall identify and flag an appropriate buffer around the nest, and no construction activities shall occur within the buffer until the qualified biologist has determined that the young have fledged or the nest is no longer active. The specific buffer width shall be determined by a qualified biologist at the time of discovery and vary according to the bird species, site conditions, and the type of work activities to be conducted.
- The survey results shall be submitted to County of Los Angeles Department of Public Works for review and approval of the recommended nest buffer areas, if any, prior to the commencement of any vegetation removal, building demolition, or noise-generating construction activities on the project site.

MM-BIO-3: Prior to the removal of any trees, a qualified arborist shall inventory native oak trees on the project site to support the application regarding the impacts on oak trees. Oak tree permit requests require a property owner to file an application with the Department of Regional Planning and provide a filing fee, an oak tree report, site plans for the property, and maps of the surrounding area. The oak tree report shall include information about the protection of oak trees that may be adjacent to construction activities that are to remain. The oak tree report shall also include the proposed replanting plan, in accordance with the required replacement ratio, for any oak trees that are to be removed.determined that the young have fledged or the nest is no longer active. The specific buffer

width shall be determined by a qualified biologist at the time of discovery and vary according to the bird species, site conditions, and the type of work activities to be conducted.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No. The proposed project changes would result in no new effects from those identified in the 2014 EIR.

a) The proposed project changes would be located within the boundaries of the existing campus and the adopted 2014 Master Plan. The project site is similar to the baseline conditions that were described in the 2014 EIR in that the site is still highly disturbed. As noted above and described in the 2014 EIR, there is some limited potential for several bat species, all considered California Species of Concern, to occur in the project site due to some limited foraging and roost potential, and there is a potential for roosting Western yellow bats to be present in palm trees on the project site. The proposed project changes would not increase the severity or likelihood of impacts and no new significant impacts are anticipated.

   There are no candidate, sensitive, or special-status animal or plant species on-site, with the exception of the two California black walnut trees identified in the 2014 EIR. No new significant or substantially more severe significant impacts to these and other biological resources would occur as a result of the proposed project changes.

b) As discussed above, the project site is fully developed and does not contain areas with a riparian or other sensitive natural communities. Therefore, no impacts to wetlands or natural communities would occur as a result of the project changes.

c) See b) above.

d) The proposed project changes would not result in any new significant impacts or substantially more severe significant impacts than those described in the 2014 EIR to wildlife movement. Impacts would be similar to those described in the 2014 EIR and would be limited to potential impacts to nesting bird species. Adopted mitigation measures and compliance with the MBTA would ensure that any impacts to nesting birds are minimized.

e) The proposed project changes would result in impacts similar to those described in the 2014 EIR and, as described in the 2014 EIR, compliance with the provisions of the Los Angeles County Oak Tree Ordinance would continue to reduce impacts to a less than significant level. No new impacts have been identified, and no further analysis is warranted.

f) No habitat or other conservation plans encompass the project site; therefore, no impacts would occur due to the project changes.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measures MM-BIO-1 through MM-BIO-3 would continue to apply to the proposed project.

V.	**2014 EIR Impact Determination for CULTURAL RESOURCES –** Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines?	☒	☐	☐	☐
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines?	☐	☒	☐	☐
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

2014 EIR Impact Discussion

a) The 2014 EIR found that the Master Plan would result in an unavoidable significant adverse historical resources impacts due to the proposed demolition of the Women's and Children's Hospital building, which has been determined eligible for listing in the California Register of Historical Resources. The EIR 2014 EIR also determined that impacts to other historical resource due to individual projects under the Master Plan could be significant but would vary, depending on final plans. Mitigation measures MM-CR-1 through MM-CR-7 were proposed to reduce the impacts due to potential construction impacts on the historical resources identified in the 2014 EIR. However, the determination as to the extent of impacts and the level to which they can be mitigated will depend on development of final project plans and the extent of potential alterations to the historical resources on the campus. Therefore, impacts were considered to be potentially significant after implementation of proposed mitigation measures.

b) Surface disturbances over the past 130 years have probably destroyed intact archaeological resources. Therefore, there is a low likelihood of encountering prehistoric and historical archaeological resources. Nonetheless, the possibility remains that structural demolition and grading and excavation for new foundations and access routes, as well as excavation for parking structures, could affect unknown buried archaeological resources. Construction impacts on archaeological resources, if any are found, are expected to be reduced to a level of less than significant with implementation of mitigation measure MM-CR-8. Operation of the Master Plan would not affect archaeological resources.

c) Although the extent of construction impacts would vary, depending on final plans, and would need to be analyzed in detail to determine what level of monitoring, if any, would be required, it is likely that paleontological resources could be encountered during construction activities should excavation extend more than 6 feet below the original ground surface in Quaternary sediments or occur in the Puente Formation. Therefore, a Paleontological Mitigation Plan is recommended. The plan would provide procedures that would ensure that any adverse effects on paleontological resources would be mitigated. Impacts on paleontological resources, if any are found, are expected to be reduced to a level of less than significant with implementation of mitigation measure MM-CR-9.

Operation of the LAC+USC Medical Center campus under the proposed Master Plan would not affect historical, archaeological, or paleontological resources.

d) The project site is not located in an area that contains formal or known informal cemeteries. Should human remains be uncovered during construction, mitigation plans would require construction to halt in the area of discovery, the area to be protected, and no further disturbance to occur, as specified by State

Health and Safety Code Section 7050.5. Impacts on human remains, if any, are expected to be reduced to a level of less than significant with implementation of mitigation measure MM-CR-10.

2014 Adopted Mitigation Measures

MM-CR-1: Prior to the removal of or alterations to the 1933 retaining walls or the overall setting of State Street, which are considered character-defining features of the General Hospital/Acute Unit setting, documentation of these features of the General Hospital setting in a manner that meets Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) standards shall be prepared. This shall include photographs and drawings of the current conditions, including State Street, the retaining walls, the forecourt, and the ancillary buildings. Preservation of the character-defining features shall be attempted.

MM-CR-2: Prior to demolition of the Women's and Children's Hospital, documentation of this property to HABS/HAER standards shall be prepared. Character-defining features shall be called out, and a historic context for this building shall be prepared.

MM-CR-3: A protection plan for the viaduct/tunnel shall be prepared prior to the construction of any Master Plan project that would occur in the immediate vicinity of the viaduct/tunnel. This protection plan shall be prepared by a qualified historic preservation specialist who shall document the current condition of this structure before any construction begins and monitor the structure during construction.

MM-CR-4: A historic structures report shall be prepared that identifies the character-defining features of the old Administration Building and the Pharmacy/Service Building, which will provide the basis for preparation of a protection and preservation plan for these buildings. The preservation and protection plan shall be prepared by a qualified historic preservation consultant who will document the current condition of the buildings and monitor the condition of the buildings during any construction activities.

MM-CR-5: The County shall consult with a qualified historic preservation consultant to determine appropriate street and walkway lighting that both enhances the historic setting of General Hospital and provides sufficient illumination. All new material, such as streetlights, benches, bollards, and other street/landscape furniture, shall be chosen in consultation with the historic preservation expert and meet the Secretary of the Interior's Standards.

MM-CR-6: Prior to proceeding with construction of individual development projects that could adversely affect properties 50 years of age or older on the medical center campus, the County shall evaluate those properties to determine their eligibility for the CRHR and/or NRHP.

MM-CR-7: An updated State of California Department of Parks and Recreation (DPR) 523 form shall be prepared by a qualified architectural historian, historian, or historical architect for General Hospital and its setting that specifically identifies the contributing and non-contributing features of the historic General Hospital and its setting. The DPR 523 form shall be prepared prior to undertaking of any work within the setting of General Hospital that could adversely affect this historic resource.

MM-CR-8: Prior to any demolition, grading, or excavation related to the construction of facilities or improvements under the Master Plan, a qualified archaeologist shall be retained by the County or construction contractor to determine which areas shall require cultural resources monitoring during initial ground disturbance. The location of construction activities that are likely to encounter subsurface sediments with archaeological sensitivity shall be determined by the qualified archaeologist upon review of project excavation and grading plans.

If determined necessary, monitoring by a qualified archaeologist shall be conducted in the project area during all initial ground-disturbing activities. If, during cultural resources monitoring, the archaeologist determines that the sediments being excavated have been previously disturbed and are unlikely to contain significant cultural materials, the archaeologist shall request that monitoring be reduced or eliminated. Spot-check monitoring shall occur during all construction, on a schedule determined by the project archaeologist.

If buried cultural resources such as trash deposits, building foundations, privy pits, flaked or ground stone, or human remains are inadvertently discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find. Treatment measures for items that are not associated with human remains typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation.

MM-CR-9: Prior to any excavation related to the construction of facilities or improvements proposed under the Master Plan, a qualified vertebrate paleontologist with a graduate degree and more than 10 years of experience shall be retained by the County or construction contractor to determine areas that shall require paleontological

monitoring during initial ground disturbance. The locations for construction activities, especially excavation for the proposed parking garages, which is likely to encounter subsurface sediments with high paleontological sensitivity, shall be determined by the qualified paleontologist upon review of project excavation and grading plans. Very shallow surficial excavations (i.e., less than 5 feet in depth) within areas of previous disturbance or areas of Quaternary younger alluvial deposits shall be monitored on a part-time basis to ensure that underlying sensitive units (i.e., Quaternary older alluvium) are not adversely affected. Areas consisting of artificial fill materials shall not require monitoring.

If excavations for the project take place in Quaternary older alluvial deposits or within Fernando or Puente Formation bedrock, such excavations shall be monitored on a full-time basis by a qualified paleontological monitor and under the supervision of the qualified paleontologist. The paleontological resource monitoring shall include inspection of exposed rock units during active excavations within the geologically sensitive sediments. Monitoring may be reduced if some of the potentially fossiliferous units described herein are, upon exposure and examination by qualified paleontologic personnel, determined to have a low potential for containing fossil resources.

The paleontologic monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall have authority to temporarily divert grading away from exposed fossils to recover the fossil specimens professionally and efficiently and collect associated data. All efforts to avoid delays in project schedules shall be made. To prevent construction delays, paleontological monitors shall be equipped with the necessary tools for the rapid removal of fossils and retrieval of associated data. This equipment shall include handheld global positioning system receivers, digital cameras, and cell phones as well as a tool kit with specimen containers, matrix sampling bags, field labels, field tools (e.g., awls, hammers, chisels, shovels, etc.), and plaster kits. At each fossil locality, field data forms shall be used to record pertinent geologic data, stratigraphic sections shall be measured, and appropriate sediment samples shall be collected and submitted for analysis.

Fossils collected, if any, shall be transported to a paleontological laboratory for processing where they shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility (such as LACM).

Following analysis, a Report of Findings with an appended itemized inventory of specimens shall be prepared. The report and inventory, when submitted to the appropriate lead agency along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts on paleontological resources.

MM-CR-10: In the event that human remains are uncovered, construction plans shall specify that construction shall halt in the area of discovery, the area shall be protected, and no further disturbance shall occur, as specified by State Health and Safety Code Section 7050.5. The County coroner shall determine the origin and disposition of the human remains pursuant to PRC Section 5097.98. If the coroner recognizes the remains to be Native American, he or she shall contact the NAHC within 24 hours. For remains of Native American origin, no further excavation or disturbance shall take place until the most likely descendant of the deceased Native American(s) has made a recommendation to the landowner or the person responsible for the excavation work regarding the means for treating or disposing of the human remains and any associated grave goods, with appropriate dignity, as provided by PRC Section 5097.9. In consultation with the most likely descendant, the project archaeologist and the project proponent shall determine a course of action regarding preservation or excavation of Native American human remains, and this recommendation shall be implemented expeditiously. If the NAHC is unable to identify a most likely descendant or the descendant fails to make a recommendation within 48 hours after being notified by the commission, the project archaeologist and the project proponent shall determine a course of action regarding preservation or excavation of Native American human remains, which shall be submitted to the NAHC for review prior to implementation.sources.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) The proposed project changes would occur within the boundaries of the campus, and the proposed new facilities would be constructed on or near sites identified for redevelopment under the 2014 Master Plan.

As a consequence, the proposed project changes would not result in new impacts to historical, archaeological, or paleontological resources that were not previously identified in the 2014 EIR. Additionally, the 2014 EIR anticipated that construction of facilities and improvements at the LAC+USC Medical Center would include alteration to or demolition of properties determined eligible for listing in the NRHP and/or the CRHR, and considered historical resources as defined in Section 15064.5 of the State CEQA Guidelines. The 2014 EIR identified the demolition of the Women's and Children's Hospital, associated gatehouse, and potentially other historic resources on the campus as significant impacts. The proposed project changes and new facilities would still be subject to implementation of mitigation measures MM-CR-1 through MM-CR-9 that were included in the 2014 EIR. MM-CR-3 requires a protection plan be prepared prior to the construction of any project that would occur in the immediate vicinity of the viaduct/tunnel as well as a pre-construction conditions assessment and monitoring during construction. MM-CR-4 requires the preparation of a historic structures report for the old Administration Building and the Pharmacy/Service Building, as well as a pre-construction conditions assessment and monitoring during construction.

b) As discussed in the 2014 EIR and above, there is a low likelihood of encountering prehistoric and historical archaeological resources. Nonetheless, the possibility remains that structural demolition and grading and excavation to construct the facilities and improvements identified in the 2014 EIR, as well as the proposed project changes, could affect unknown buried archaeological resources. Construction impacts on archaeological resources, if any are found, are expected to be reduced to a level of less than significant with implementation of mitigation measure MM-CR-8. Operation of the Master Plan would not affect archaeological resources. No new significant or substantially more severe significant impacts would occur as a result of the proposed project changes. Also, see a) above.

c) The 2014 EIR concluded that paleontological resources could be encountered during construction activities should excavation extend more than 6 feet below the original ground surface in Quaternary sediments or occur in the Puente Formation. It is possible the proposed project changes could also result in similar impacts. As described in the 2014, if impacts on paleontological resources occur, they would be reduced to a level of less than significant with implementation of mitigation measure MM-CR-9. Therefore, no new or substantially more severe significant impacts would occur as a result of the proposed project changes.

d) As noted above, the campus is not located in an area that is known to contain formal or known informal cemeteries. Nonetheless, should human remains be uncovered during construction, impacts on human remains would be reduced to a level of less than significant with implementation of mitigation measure MM-CR-10. Therefore, the proposed project changes, which would occur within the boundaries of the campus and 2014 Master Plan, would not result in new or substantially more severe significant impacts than those identified in the 2014 EIR.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measures MM-CR-1 to MM-CR-10 would continue to apply to the proposed project.

VI. **2014 EIR Impact Determination for GEOLOGY AND SOILS –** Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismically related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☒	☐	☐
e) Have soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

2014 EIR Impact Discussion

a) The project site is not transected by known active or potentially active faults. The active Upper Elysian Park blind thrust fault is located approximately 0.4 mile north of the approximate center of the site, the active Raymond fault is located approximately 4.2 miles north of the approximate center of the site, and the active Hollywood fault is located approximately 4.3 miles northwest of the approximate center of the site. Therefore, the potential for surface rupture is relatively low. However, lurching or cracking of the ground surface as a result of nearby seismic events is possible, a potentially significant impact. Implementation of mitigation measure MM-GEO-1 would reduce potential fault rupture hazards to a less-than-significant level.

Because Master Plan development would be located within a seismically active region, the potential exists for seismic ground shaking. However, the level of ground shaking at a given location depends on many factors, including the size and type of earthquake, the distance from the earthquake, and subsurface geologic conditions. The type of construction also affects how particular structures and improvements perform during ground shaking. The potential levels of ground shaking at the project site could result in significant impacts on future improvements. However, Master Plan development would adhere to all applicable seismic design requirements and guidelines. Additionally, implementation of structural design

mitigation measures (see MM-GEO-1, below) would reduce potential seismic ground shaking impacts to a less-than-significant level.

According to the preliminary geotechnical evaluation prepared for the Master Plan, the western portion of the project site is located within an area that is considered susceptible to liquefaction. Other areas of the site that are not indicated on the state map as susceptible could also be subject to liquefaction. Liquefaction and its associated manifestations could cause damage to future project improvements if not mitigated during detailed project design, a potentially significant impact. The potential damaging and significant effects of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving and cracking of pavement due to sand boiling, and the buckling of deep foundations due to liquefaction-induced ground settlement. Mitigation measures identified in MM-GEO-1 would reduce the potentially significant liquefaction hazards impacts to campus development to a less-than-significant level.

The potential for future landslides or mudflows to affect developments within the project area is relatively low. Significant impacts related to landslides or mudflows within the project area are not anticipated. Slopes created for future developments within the project area would be designed to reduce the potential for landslides or mudflows. This would be considered a less than significant impact.

b) Construction of Master Plan facilities and improvements could result in ground surface disruption, including disruptions from grading and excavation activities. Such activities could result in erosion at the project site during construction. However, construction projects that result in ground disturbance of 1 acre or more must apply for a Stormwater General Permit under the National Pollutant Discharge Elimination System (NPDES). All construction would follow best management practices (BMPs) to prevent erosion that might move off-site, as required under the Stormwater Pollution Prevention Plan (SWPPP) for compliance with State Water Resources Control Board NPDES Construction General Permit 2009-0009. In accordance with existing regulations, the SWPPP would be prepared to identify BMPs that would be implemented to prevent construction area runoff and sediment from entering the storm drain system. Implementation of BMPs would ensure that sediment would be confined to the construction area and not transported off-site. As a result, project impacts would be less than significant. During long-term operation of proposed developments and improvements at the project site, provisions for surface drainage and incorporation of appropriate BMPs (filtration, runoff-minimizing landscaping for common areas, energy dissipaters, inlet trash racks, and water quality inlets) would reduce the potential for soil erosion at the site. Additionally, proposed stormwater and low impact development (LID) features (i.e., bioretention and wetland/detention areas) would also minimize runoff and the potential for soil erosion. Therefore, operational impacts would be less than significant.

c) Mapped areas of subsidence were not found in the City or County of Los Angeles reference materials. The County of Los Angeles General Plan Safety Element includes goals and policies addressing the introduction or expansion of developments in areas known to have geologic hazards. Therefore, the potential for subsidence on the project site is relatively low. This would be considered a less-than-significant impact.

Given the reported depth of groundwater in the project area and the anticipated depth of the aforementioned construction activities, groundwater could have a significant impact on excavations for future project improvements. Wet or saturated soil encountered in excavations for the project could cause instability and present a constraint to the construction of foundations. Structural design and mitigation techniques would be developed to reduce impacts related to liquefaction. Therefore, liquefaction impacts would be considered less than significant with mitigation incorporated.

Because of the presence of potentially compressible/collapsible soils at the site, the potential exists for differential settlement to cause damage to project improvements. The potential impacts of settlement would be considered significant without appropriate mitigation implemented during detailed project design and construction. Mitigation measures, including removal of compressible/collapsible soils and replacement with compacted fill, would reduce potential impacts to less-than-significant.

d) The near-surface soils at the project site are composed predominantly of sandy, coarse-grained materials. These soils typically have a low expansion potential. However, clayey soils may be present in areas that were not observed. If construction activities occur on soils that are known to be potentially expansive, the impact on proposed future improvements could be significant. Implementation of the proposed mitigation

measure (MM-GEO-1) would reduce potential impacts from expansive soils to less than significant.

e) The project site is served by local sewer lines that would convey wastewater to City of Los Angeles wastewater treatment facilities. No septic tanks are proposed as part of the project.

2014 Adopted Mitigation Measures

MM-GEO-1: All recommendations included in the preliminary geotechnical evaluation prepared for the proposed project (see Appendix D of 2017 Final EIR) shall be followed. A detailed subsurface geotechnical evaluation shall be performed to address site-specific conditions at the locations of the planned improvements and provide detailed recommendations for design and construction.

The geotechnical evaluation shall include the following measures to mitigate potential fault rupture, seismic ground shaking, and liquefaction hazards identified under Impacts GEO-1 and GEO-2 (see 2017 Final EIR).

- *Seismicity*: Structural elements of future improvements shall be designed to resist or accommodate appropriate site-specific ground motions and conform to the current seismic design standards.
- *Liquefaction*: An assessment of the liquefaction potential shall be made prior to detailed design and construction of project improvements. Structural design and mitigation techniques, such as in situ ground modification or supporting foundations with piles at depths designed specifically for liquefaction, shall be included.

  To evaluate the potential for liquefaction, subsurface evaluation may be performed. Site-specific geotechnical evaluations that assess the liquefaction and dynamic settlement characteristics of the on-site soils shall include the drilling of exploratory borings, evaluation of groundwater depths, and laboratory testing of soils.

  Methods for construction in areas with a potential liquefaction hazard may include in situ ground modification, removal of liquefiable layers and replacement with compacted fill, or support of project improvements on piles at depths designed specifically for liquefaction. Pile foundations can be designed for a liquefaction hazard by supporting the piles on dense soil or bedrock located below the liquefiable zone or employing other appropriate methods, as evaluated during the site-specific evaluation. Additional recommendations for mitigation pertaining to liquefaction may include densification by installation of stone columns, vibration, deep dynamic compaction, and/or compaction grouting.

  The geotechnical evaluation shall include the following measures to mitigate unstable soil impacts identified under Impact GEO-3 (see 2017 Final EIR).
- *Groundwater:* Excavations for foundations in areas with shallow perched groundwater may need to be cased/shored and/or dewatered to maintain stability of the excavations and provide access for construction. All recommendations included in the preliminary geotechnical evaluation pertaining to groundwater shall be followed.

  Excavations for underground structures will need to be performed with care to reduce the potential for lateral deflection of excavation sidewalls and/or shoring, which may also cause differential movement of structures located near the excavation. Further study, including subsurface exploration, shall be performed during the detailed design phase of future improvements to evaluate the presence of groundwater, seepage, and/or perched groundwater at the site and the potential impacts on design and construction of project improvements. An assessment of the potential for shallow groundwater shall be made during the design phase of the project, and mitigation techniques shall be developed as necessary.
- *Collapsible Soils/Settlement*: An assessment of the potential for soils that are prone to settlement shall be made prior to detailed design and construction of project improvements, and mitigation techniques shall be developed, as appropriate, to reduce impacts related to settlement to low levels.

  During the detailed design phase of the project, surface reconnaissance and site-specific geotechnical evaluations shall be performed to assess the settlement potential of the on-site natural soils and undocumented fill. This may include detailed surface reconnaissance to evaluate site conditions, drilling of exploratory borings or test pits, and laboratory testing of soils, where appropriate, to evaluate site conditions.

  Prescribed mitigation measures for soils with the potential for settlement shall include either removal of the compressible/collapsible soil layers and replacement with compacted fill, surcharging to induce settlement prior to construction of improvements, allowing for a settlement period after or during construction with new fills, or a

specialized foundation design, including the use of deep foundation systems to support structures. Varieties of in situ soil improvement techniques are also available, such as dynamic compaction (heavy tamping) or compaction grouting.

The geotechnical evaluation shall include the following measures to mitigate the expansive and corrosive soils hazards identified under Impact GEO-4.

- *Expansive Soils*: Mitigation techniques to reduce expansive soil potential shall be included as necessary. Techniques shall include overexcavation and replacement with non-expansive soil, soil treatment, moisture management, and/or a specific structural design for expansive soil conditions developed during the design phase.
- *Corrosive Soils*: An assessment of the potential for corrosive soils shall be made during the detailed design phase of the project through soil testing procedures. Mitigation techniques shall be developed, as appropriate, to reduce impacts related to corrosive soils to low levels.

Subsurface evaluation, including laboratory testing, shall be performed. Evaluation of the corrosive soil potential shall be accomplished through testing and analysis of soils at foundation design depths. The laboratory tests conducted on the soils prior to construction and improvement plan preparation shall include corrosivity tests. Review of these data by a corrosion engineer will result in corrosion protection measures that will be suitable to the project elements. Evaluation of the potential corrosive soils hazard shall be performed prior to detailed design and construction so that, in the event the hazard exists, mitigation techniques may be implemented. To avoid site-specific subsurface evaluation, corrosion protection measures may be included in the initial design for the proposed project improvements.

Mitigation for corrosive soil conditions may involve the use of concrete that is resistant to sulfate exposure. Corrosion protection for metals may be needed for underground foundations or structures in areas where corrosive groundwater or soil could cause deterioration. Typical mitigation techniques include epoxy and metallic protective coatings, the use of alternative (corrosion-resistant) materials, and selection of the appropriate type of cement and water/cement ratio.

MM-GEO-2: All earthwork and grading shall be performed in accordance with the recommendations in the SWPPP and the Construction Activities Stormwater General Permit. Additionally, BMPs related to ongoing drainage design and maintenance practices shall be included in the SWPPP and implemented to reduce soil erosion during operation of the proposed project. The BMPs shall include design procedures such as a surface drainage design for roadways and facilities to provide for positive surface runoff and reduce concentrated runoff conditions. Other examples of BMPs include the use of erosion prevention mats or geofabrics, silt fencing, sandbags and plastic sheeting, and temporary drainage devices.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) Although the proposed project changes include two new residential care facilities and a new childcare facility (see project description), these changes would occur in areas within the campus proposed for development or in the immediate vicinity of other development identified in the 2014 EIR. Additionally, no new seismic hazards have been identified subsequent to preparation of the 2014 EIR. Therefore, the proposed project changes would not expose people or structure to new or substantially greater seismic or geological hazards or risks than those identified in the 2014 EIR. Additionally, with implementation of the mitigation measures identified in the 2014 EIR, specifically all recommendations in the geotechnical investigation, impacts would be less than significant. No new or substantially more severe significant impacts would occur.

b) The proposed project changes would result in soil erosion impacts similar to those described in the 2014 EIR, which would be minimized though compliance with NPDES permit requirements and implementation of the mitigation measures identified above. Additionally, the proposed project changes would result in slightly less development (in terms of building square footage) than what was proposed in the 2014 EIR. Therefore, no new or substantially more severe significant impacts would occur as a result of the proposed project changes

c) See the responses to a) and b) above.

d) See the responses to a) and b) above.

e) The proposed project changes would not require development of septic tanks. No new impacts would occur.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measures MM-GEO-1 to MM-GEO-2 would continue to apply to the proposed project.

VII. 2014 EIR Impact Determination for GREENHOUSE GAS EMISSIONS –
Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?	☐	☒	☐	☐

2014 EIR Impact Discussion

a) Long-term operation of proposed Master Plan facilities would result in GHG emissions from fuel combustion (i.e., from on-road motor vehicles traveling to and from the campus); natural gas, electricity, and water consumption; and wastewater and solid waste generation. Total annual GHG emissions due to the Master Plan are expected to exceed the 3,000 MT CO2e threshold, resulting in a significant impact prior to mitigation. To put project emissions into perspective, statewide CO2e emissions for 2012 were estimated to be 458.7 million MT; the anticipated buildout total under the proposed Master Plan is 37,281 MT, or 0.037281 million MT. In addition to implementation of MM-GHG-1 and project-specific design features, actions undertaken by the state will further reduce project-related GHGs in the future. Nonetheless, net project GHG would continue to exceed the 3,000 MT significance threshold after incorporation of mitigation measures. As such, this impact is considered significant and unavoidable.

b) By adopting all feasible project design and mitigation measures (described above) to reduce GHG emissions, the Master Plan would be consistent with and not frustrate any AB 32 Scoping Plan measures, nor would it be inconsistent in any way with the AB 32 goal of reducing state-wide GHG emissions to 1990 levels by year 2020. As such, the Master Plan would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Impact is considered less than significant with mitigation measure MM-GHG-1 incorporated.

2014 Adopted Mitigation Measures

MM-GHG-1. To reduce GHG emissions during operations, the County shall incorporate the following mitigation measures into the design of each new element, as practicable.

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility. The project applicant should commit to applying to the local utility to install the maximum number of solar panels possible.
- Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
- Maximize the planting of trees in landscaping and parking lots.
- Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Install light colored “cool” roofs and cool pavements.
- Limit the use of outdoor lighting to only that needed for safety and security purposes.
- Require use of electric lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.

- Use of water-based or low VOC cleaning products.
- Install Electric Vehicle (EV) Charging Stations on at-least 5% of all vehicle parking spaces, consistent with City of Los Angeles requirements for all new projects.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) The proposed project changes would not result in effects that were not previously examined or evaluated for greenhouse gas (GHG) emissions in the 2014 EIR. Implementation of the proposed project changes would result in an overall net reduction of approximately in building space at the project site. With respect to GHG emissions generated during project construction and operations, the overall decrease in building square footage as a result of the proposed changes would result in a net reduction of these emissions. As analyzed in the 2014 EIR, the net increase in annual GHG emissions associated with construction activities and operations for the 2014 Master Plan compared to existing conditions was 37,281 MT CO2e, which exceeded the 3,000 MT CO2e threshold. While the overall reduction of building space under the proposed changes would result in lower annual GHG emissions than what was analyzed in the 2014 EIR, this reduction would not result in annual GHG emissions by the proposed project that would be below the 3,000 MT CO2e threshold used in the 2014 EIR. Thus, as was concluded in the 2014 EIR, the net project GHG emissions would, despite implementation of MM- GHG-1 along with MM-AQ-2 through MM-AQ-3, would remain significant and unavoidable.

b) With respect to consistency with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions, the proposed project changes would not result in any effects that were not examined in the 2014 EIR. As concluded in the 2014 EIR, the adoption of all feasible project design and mitigation measures to reduce GHG emissions by the proposed project would render it to be consistent with the AB 32 Scoping Plan measures. With incorporation of identified mitigation measures, this impact would be less than significant.

Overall, as discussed above, the proposed project changes would not result in a new significant impact or a more severe impact than what was analyzed and disclosed in the 2014 EIR with respect to GHG emissions. No new impacts have been identified, and no further evaluation is warranted.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measure MM-GHG-1 would continue to apply to the proposed project.

VIII.	**2014 EIR Impact Determination for HAZARDS AND HAZARDOUS MATERIALS –** Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c)	Emit hazardous emissions or require the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☒	☐
d)	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to U.S. Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?	☐	☒	☐	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f)	For a project in the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
h)	Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

2014 EIR Impact Discussion

a) Project construction would involve the routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and caulking. Given that Master Plan facilities would be required to comply with applicable regulations, such as the RCRA, Department of Transportation Hazardous Materials Regulations, and local CUPA regulations, and given the small amounts of hazardous materials that would be used during the construction phase, the Master Plan would not be expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b) Site buildings designated for future demolition or renovation may contain ACM and LBP. The presence of asbestos---containing materials (ACM) and lead-based paint (LBP) is a potential environmental concern (PEC). The presence of thermal system insulation (TSI), which is in fair condition within the tunnel located between General Hospital and the pharmacy, is also a PEC. Additionally, indications of USTs were observed during site reconnaissance near the General Hospital, Central Plant (East), Central Plant (West), and the Women's and Children's Hospital. The presence of USTs at the site is a PEC. Monitoring wells, indicating groundwater contaminated with petroleum hydrocarbons, were observed north of General

Hospital in an area with a known open remediation process. This is indicative of a PEC.

Clarifiers were observed at the site south of the telephone exchange, within Central Plant (East), north of Central Plant (West), and east of the medical examiner's building. Clarifiers at the site are indicative of a PEC. A list of elevators, including their type of mechanical operation (i.e., hydro, traction, gearless), was provided. Hydraulic oil used in hydro elevators is indicative of a PEC for the project site.

Two gas stations were found formerly occupying the southeast portion of the project site during historical document review. The presence of gas stations indicates the potential for releases from USTs at the sites, which represents a PEC for the project site.

Construction activities could result in a potentially significant impact on construction personnel due to exposure to hazardous wastes that may be encountered or disturbed during construction. Implementation of mitigation measures MM-HAZ-1 through MM-HAZ-3 would be required to reduce the potential construction impacts related to hazardous wastes to a less-than-significant level.

No significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous waste during operation of Master Plan facilities is anticipated. Impacts would be less than significant.

Compliance with federal, state, and local regulations, in combination with construction BMPs implemented as part of a Stormwater Pollution Prevention Plan, would ensure that operational impacts related to routine transport, use, or disposal of hazardous waste would be less than significant. Implementation of MM-HAZ-1 through MM-HAZ-3 would also ensure that all hazardous materials would be used, stored, and disposed of properly, which would minimize potential impacts related to hazardous materials releases. Furthermore, any accidental spills of materials considered hazardous would be confined immediately, with the materials removed and disposed of in accordance with all applicable safety regulations and disposal methods.

Operation of future facilities and buildings on the campus over the project's span of 25 years could result in the use of solvents, cleaning agents, paints, pesticides, diesel, petroleum fuels, and batteries. These products would be used in small amounts, and any spills that may occur would be limited in scope and cleaned up soon after the occurrence.

Additionally, all hazardous materials would be handled in accordance with all applicable rules and regulations. Biomedical wastes would be handled and transported for disposal during operation of future facilities. Current safety protocols for such materials at the Medical Center Campus would be carried forward into the operation of future facilities, and the risk due to the release of biomedical wastes into the environment would be minimal. Therefore, operation of Master Plan facilities would result in a less-than-significant impact related to hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

The PECs identified in the Environmental Setting section of the 2014 Final EIR generally do not pose a significant hazard to the campus or occupants of existing buildings on the campus unless the sites are disturbed during construction and hazardous materials are released into the environment. Therefore, operation of future facilities is not expected to result in significant increased hazards to the public or the environment due to the proximity of those facilities to existing hazardous materials sites.

c) Impacts due to exposure to or disturbance of hazardous materials or wastes would generally be limited to the project site. Furthermore, any hazardous waste being hauled to and from the project site would have to be secured and contained to prevent its release, in accordance with existing federal and state regulations for the hauling of such waste. Given this fact, and because development under the Master Plan would comply with all applicable regulations, impacts on nearby schools would be less than significant. Additionally, implementation of mitigation measures MM-HAZ-1 through MM-HAZ 3 would ensure that no adverse impacts on nearby schools would occur. Operation of Master Plan facilities could result in the use of solvents, cleaning agents, paints, pesticides, diesel, petroleum fuels, and batteries. Although the project boundary is within 0.25 mile of the Bravo Medical Magnet High School, hazardous materials would generally be used in small amounts, and any spills that may occur would be limited in scope and cleaned up soon after the occurrence. Additionally, it is expected that all hazardous materials would be handled in accordance with all applicable rules and regulations. Therefore, operation of the Master Plan would result in a less-than-significant impact. Also, see the discussion above.

d) See discussion above.

e) The project site is not located within 2 miles of a public or private airstrip.

f) See e) above.

g) Construction activities could temporarily impair and/or interfere with emergency response access in the vicinity of the project site because of possible lane closures, detours, and construction-related traffic. This impact would be a temporary but nonetheless potentially significant impact. However, the County would coordinate with local emergency response providers during construction to minimize potential traffic and access impacts and ensure continued emergency access to the project site and nearby properties (see mitigation measures MM-PS-1 in Section 3.12, Public Services, and MM-TRAF-1 in Section 3.14, Transportation/Traffic of the 2014 Final EIR). New buildings proposed under the Master Plan would be designed to conform to County of Los Angeles Fire Department standards for emergency ingress/egress and clearances, and the new buildings would be integrated into the existing emergency response plan and emergency evacuation plan for the site. The County of Los Angeles Fire Department reviews building plans to ensure conformance with these standards as part of the standard building plan approval process.

While it is acknowledged that build-out of the Master Plan would increase traffic congestion around the Medical Center campus, no significant impacts during project operation would be expected because the Master Plan would allow for adequate access through and to the project site.

h) No further analysis of issues related to wildland fires was warranted in the 2014 EIR, as it was determined in the NOP/IS that the Master Plan would not result in impacts in those areas.

2014 Adopted Mitigation Measures

MM-HAZ-1: In order to minimize exposure, prior to demolition activities, asbestos-containing materials and lead-based paint surveys and evaluations shall be conducted in buildings that are to be demolished or renovated. Abatement measures shall be implemented in accordance with the recommendations of these evaluations. Asbestos surveys shall be conducted in accordance with SCAQMD Rule 1403, which specifies that all surveys are to be carried out by a Cal/OSHA-certified asbestos consultant and will follow established survey protocols, notification, and work practice requirements. Lead-based paint surveys shall be carried out by California Department of Public Health (CDPH)-certified inspector/assessor. If necessary, a lead abatement plan would be prepared by the CDPH-certified project monitor or supervisor, and demolition activities would be performed by CDPH-certified workers.

MM-HAZ-2: Prior to start of construction, an additional investigation of the leaking underground storage tank site at 1200 North State Street (according to SWRCB's GeoTracker website, groundwater is currently being monitored at the address) shall be conducted to determine its potential impact on project site development. In the event that environmental concerns are discovered, a certified geologist or industrial hygienist will specify an appropriate course of action, which may involve removal and disposal of contaminated materials, and remediation of the area of concern.

MM-HAZ-3: As part of a Phase II Environmental Site Assessment, prior to construction, additional investigations at the former suspected locations of USTs (both abandoned in place and those where no records of removal have been found) and the former boilers and powerhouse. In the event that environmental concerns are discovered, a certified geologist or industrial hygienist will specify an appropriate course of action, which may involve removal, disposal, and remediation of the area of concern.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) The proposed project changes would involve the construction and operation of medical and community facilities consistent with or similar to the land uses proposed in the 2014 EIR. The proposed uses would have the potential to involve the routine use and/or creation of hazardous materials, including bio-hazardous waste and radioactive substances, as described in the 2014 EIR. All hazardous materials would continue to be handled in accordance with all applicable rules and regulations. Biomedical wastes would be handled and transported for disposal during operation of future facilities. Current safety protocols for such materials at the Medical Center Campus would be carried forward into the operation of future

facilities, and the risk due to the release of biomedical wastes into the environment would be minimal. The two potential sites for the new childcare facility and the proposed new site for the central utility plant are located within the campus boundaries on or near sites identified in the 2014 EIR for future campus improvements; therefore, construction and operation of these facilities are not expected to result in hazardous material impacts that were not previously evaluated. Similar to what was stated in the 2014 EIR, construction activities could result in a potentially significant impact on construction personnel due to exposure to hazardous wastes that may be encountered or disturbed during construction. Mitigation measures MM-HAZ-1 through MM HAZ-3 would still be applicable to the proposed changes.

Operation of the proposed project would comply with all applicable regulations with regard to hazardous substances. Compliance with applicable laws and regulations governing hazardous materials would ensure that all potentially hazardous materials would be used and handled in an appropriate manner to minimize the potential for accidental release of these substances. These requirements are in place to ensure public safety and are required as standard permitting conditions.

b) See the response to a) above. No new or substantially more severe significant impacts would occur as a result of the proposed project changes.

c) The proposed project changes would be located within the boundaries of the existing campus and adopted 2014 Master Plan and the proposed new uses would be consistent with the uses identified in the 2014 EIR and existing uses on the campus. Therefore, impacts on nearby schools due to the proposed project changes would be similar to the impacts described in the 2014 EIR. No new or substantially more severe significant impacts would occur.

d) The proposed project changes would be located within the boundaries of the existing campus and adopted 2014 Master Plan on or near sites that would be redeveloped under the 2014 Master Plan. Therefore, no new or substantially more severe significant impacts would occur.

e) The proposed project changes would be located within the boundaries of the campus and the adopted 2014 Master Plan and the proposed new uses would be consistent with existing uses and those identified in the 2014 Master Plan. Additionally, no new public or private airports have been developed in the vicinity of the campus subsequent to the 2014 EIR. As a consequence, the proposed project changes would not introduce new hazards due to airport operations.

f) See the response to e) above.

g) The County would continue to coordinate with local emergency response providers during construction to minimize potential traffic and access impacts and ensure continued emergency access to the project site and nearby properties. New buildings proposed as a result of the 2017 project changes would continue to be designed to conform to County of Los Angeles Fire Department standards for emergency ingress/egress and clearances, and the new buildings would be integrated into the existing emergency response plan and emergency evacuation plan for the site. No new or substantially more severe significant impacts would occur due to the proposed project changes.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measures MM-HAZ-1 to MM-HAZ-3 would continue to apply to the proposed project.

IX.	**2014 EIR Impact Determination for HYDROLOGY AND WATER QUALITY** – Would the project:	Potentially Significant Impact	Less-than-Significant Impact	Less-than-Significant Impact	No Impact
a)	Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☒	☐	☐
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐
e)	Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f)	Otherwise substantially degrade water quality?	☐	☐	☒	☐
g)	Place housing within a 100-year flood hazard area, as mapped on a Federal Flood Hazard Boundary Map or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h)	Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒
i)	Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j)	Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

2014 Impact Discussion

a) Construction-related activities could include the use of materials such as fuels, lubricating fluids, solvents, and other materials that could result in polluted runoff. However, the potential consequences of any spill or release of these types of materials would generally be small because of the localized, short-term nature of the releases. Furthermore, the NPDES Construction General Permit and Stormwater Pollution Prevention Plan (SWPPP) require measures regarding the handling of these types of materials and protocols for actions taken if a spill or release does occur (see mitigation measure MM-HYD 1). Therefore, impacts associated with these types of pollutants would be less than significant with mitigation incorporated.

Once the project is operational, materials such as fuels or solvents may be stored on-site, similar to existing conditions. This is not anticipated to be a source of polluted stormwater runoff or dry-weather runoff. As under existing conditions, the medical center would continue to adhere to all applicable regulations.

b) Any groundwater seepage encountered during construction would be mitigated, as needed, by constructing small drainage swales from the base of the excavations to temporary sump pits or stormwater/low impact development (LID) features on-site. Any discharges of groundwater during construction would be in compliance with applicable NPDES permit requirements. The project would also comply with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous materials to reduce the potential for a release of contaminants into the groundwater as a result of project construction. Thus, construction activities would not degrade groundwater quality or interfere with recharge. Water use may temporarily increase to a limited extent during the construction phase. Therefore, construction-phase impacts would be less than significant.

Water use would increase during project operation because of the increase in the number of persons who would use the LAC+USC Medical Center facilities and the increase in landscape maintenance. Although the project would increase indoor water demand at the site, it would not lead to a significant increase in the demand for potable water for indoor use in the region. The project would increase use of potable water and groundwater for irrigation. By incorporating reclaimed water, gray water, and harvested rainwater for irrigation, the increased demand for groundwater for irrigation could be reduced. For these reasons, water demand associated with the Master Plan would not deplete groundwater supplies substantially. The project would increase groundwater recharge (see the hydrology memorandum in Appendix F of the 2014 Final EIR) and would not interfere substantially with recharge. Therefore, the impacts on groundwater supplies or recharge during operation would be less than significant. Additionally, to further reduce potential impacts, irrigation water demand above existing irrigation demands would be met by alternative supply sources to the maximum extent possible as included in MM HYD-3. Implementation of MM-HYD-4 would ensure that irrigation water demands above existing irrigation demands would be met by alternative supply sources to the maximum extent technically feasible.

c) The project would not substantially alter the existing drainage pattern of the site or result in substantial erosion or siltation on- or off-site. Standard construction-phase BMPs would decrease the potential for any significant erosion or sedimentation from soil disturbance associated with construction of the project. In addition, standard construction practices related to erosion and sediment control would be required as part of the permitting process. Construction-related erosion and sedimentation impacts resulting from soil disturbance would be less than significant after implementation of the SWPPP (see mitigation measure MM-HYD 1) and the BMPs required to control erosion and sedimentation.

The Master Plan would use drought-tolerant and California native plants within pervious areas of the project site. Additionally, proposed stormwater and LID features (i.e., bioretention and wetland/detention areas) would include vegetation. Although the proposed lawn areas would be limited in area, agricultural crops would be encouraged, and a green roof is proposed for use as an urban farm. The use of plant species with high to moderate water needs, according to Water Use Classifications of Landscape Species III, would be limited and restricted to similar water-use areas. Routine structural BMPs that could be used as part of the Master Plan include filtration, runoff-minimizing landscaping for common areas, energy dissipaters, inlet trash racks, and water quality inlets. Therefore, long-term impacts on drainage patterns across the project site that could result in substantial erosion and siltation on- or off-site would be less than significant after implementation of mitigation measure MM-HYD-1 and BMPs to control erosion and sedimentation.

The rate or amount of surface runoff resulting from project construction activities would be similar to the amount under existing conditions. During construction, the pervious nature of the project site would not be significantly altered. As such, the project would not result in a substantial increase in the rate or amount of surface runoff or flooding on- or off-site. Impacts would be less than significant. With the increased pervious (landscape) areas (increase from 5% pervious to 25% pervious on the campus) and use of LID features, the amount of stormwater runoff via surface sheet flow and the storm drain system is anticipated

to decrease as a result of the Master Plan. As such, the Master Plan would not result in a substantial increase in the rate or amount of surface runoff or result in flooding on- or off-site. Impacts would be less than significant.

In addition to the proposed LID features, drainage from proposed site improvements would be handled through a new storm drain system that would be sized for stormwater runoff from the site. The on-site storm drain system would drain into detention/retention areas located at the approximate center of new development on the west campus. These basins would discharge into the public storm drain systems. Peak flow rates and runoff volumes from the campus would be the same or lower than existing rates/volumes and would not affect the capacity or hydraulic integrity of the existing public storm drain system. Peak flow rates and runoff volumes during construction would generally be less than they are under existing conditions. This is because the existing site is 95% impervious cover. Stormwater drains into the storm drain system and receiving waters (i.e., Los Angeles River) directly from improved conveyance systems. The amount of impervious cover would not increase during construction, and at various stages of construction, it would even be less than the existing amount. This would be considered a less-than-significant impact.

d) See discussion above.

e) See discussion above.

f) The Master Plan would not degrade water quality as a result of construction and operation on the project site. During construction, the project would be required to adhere to the NPDES Construction General Permit to control erosion and protect water quality. In addition, the project would be required to adhere to County requirements and guidelines pertaining to on-site drainage flow requirements. Therefore, the project would not create or contribute runoff that would exceed the capacity of drainage systems or provide substantial additional sources of polluted runoff. Implementation of mitigation measures MM-HYD-1 through MM HYD-6, impacts associated with degrading water quality during operation would be less than significant. This would be considered a less-than-significant impact with mitigation incorporated.

g) The Master Plan would not result in impacts to housing or structures within flood zones, nor would it expose people or structures to a significant risk of loss, injury, or death involving flooding, as indicated in the NOP/IS for the 2014 EIR. No further discussion was warranted in the 2014 EIR.

h) See discussion above.

i) The project site is not located within a potential inundation area resulting from a dam failure.

j) The project site is approximately 19 miles inland from the Pacific Ocean. It is not within a potential tsunami inundation area or seiche or landslide/mudslide hazard zone. No impact would occur during construction or operation.

2014 Adopted Mitigation Measures

MM-HYD-1: Construction activity (clearing, grading, excavation, stockpiling, and reconstruction of existing facilities involving removal and replacement) resulting in a land disturbance of one or more acre, or less than one acre but part of the larger Master Plan for the campus must obtain the Construction Activities Storm Water General Permit.

Prior to beginning any construction activity, the County shall require the contractor(s) to develop the SWPPP, Construction Activities Storm Water General Permit, erosion/sediment control plan, and submit these plans for approval by the governing regulatory agency. The contractor(s) shall then perform all construction activity in accordance with the recommendations in the SWPPP, the Construction Activities Storm Water General Permit, and erosion/sediment control plan. The contractor's erosion control plan must comply with the California Stormwater Best Management Practices Handbook and meet the requirements of the statewide Construction General Permit.

MM-HYD-2: LID features shall be designed to improve water quality and minimize the leaching of nutrients from growing media. Best design practices based on the latest monitoring and research recommendations shall be incorporated. In addition to avoiding the use of growing media, mulch, and compost containing animal products, which may leach nutrients, design modifications may include incorporation of an internal storage zone. With an internal storage zone, the underdrain is elevated and anaerobic conditions are created, causing denitrification to occur, provided that a carbon food source is provided for the denitrifying bacteria. Additionally, due to the large area of proposed landscaping, phosphorous is a likely pollutant in stormwater runoff from the site. Phosphorous

can be minimized through organic maintenance methods, Integrated Pest Management, and avoiding products containing animal manure or other animal products. Although these practices apply specifically to bioretention, they should also be considered for other landscape-based LID features that could be included in the final design. If phosphorous is added to the 303(d) list for the Los Angeles River Reach 2 or the Tier 3 Pollutants of Concern for the Los Angeles River Watershed Management Area, then it becomes a pollutant of concern for the receiving water body and the specialized design measures shall be incorporated at the landscape-based LID features proposed for the site.

MM-HYD-3: Where groundwater seepage is expected, permanent monitoring wells shall be installed during construction within and around the perimeter of each building to monitor the groundwater level and evaluate the performance of the dewatering system. Before starting dewatering operations, a baseline conditions survey shall be made of all adjacent foundations and structures to assess the impact of deep excavation dewatering on adjacent structures. All signs of existing distress shall be recorded.

MM-HYD-4: Irrigation water demands above existing irrigation demands shall be met by alternative supply sources to the maximum extent technically feasible. The use of alternative water supply sources for irrigation shall be maximized to reduce the use of potable water for irrigation and approximate existing irrigation demands. Alternative water supply sources include, but are not limited to, reclaimed water, gray water, harvested rainwater (stormwater), and air-conditioning condensate (although not specifically mentioned in the Master Plan, this could represent a significant source of clean irrigation water).

MM-HYD-5: During and after construction, positive drainage shall be provided to direct water away from buildings and foundations. Where positive drainage is not provided, area drains shall be used to drain depressions or low spots that are not part of the designed LID features. Area drains shall not be placed next to buildings or in contact with buildings. All area drains and LID features shall be located, at a minimum, 8 feet away from building foundations or as directed in the International Building Code or other regulatory requirements. Roof drainage shall be controlled and directed to proper drainage devices in an acceptable manner or to LID features.

MM-HYD-6: An Operations and Maintenance Plan shall be developed for LID features at the site during the design of the initial development projects and expanded as development progresses and different LID features are added. The plan shall consider impacts on water quality and address issues related to Integrated Pest Management or organic maintenance practices, including those for hand weeding. The use of fertilizers, pesticides, herbicides, and products containing animal manure or animal products shall be avoided within any LID features at the project site. Outside of the LID features, Integrated Pest Management and organic maintenance practices shall be used.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) The proposed project changes are not likely to result in new impacts that were not described in the 2014 EIR. Given current conditions, proposed land uses, and the projected total building square footage are generally similar to those analyzed in the 2014 EIR, impacts are also expected to be similar to those described in the EIR. The existing site is still 95% impervious cover as described in the 2014 EIR. Additionally, the proposed new project facilities would continue to comply with applicable NPDES permit requirements and implement BMPs and LID features, and adhere to County requirements and guidelines pertaining to on-site drainage flow requirements.

   Once the project is operational, materials such as fuels or solvents may be stored on-site, similar to existing conditions. This is not anticipated to be a substantial source of polluted stormwater runoff or dry-weather runoff. Changes to the 2014 Master Plan would continue to adhere to all applicable regulations. Impacts related to hydrology and water quality impacts are expected to remain less than significant with updated site design. No further analysis is warranted.

b) The proposed project changes would be located within the boundaries of the campus and the adopted 2014 Master Plan. The proposed new uses would also be similar to those described in the 2014 EIR and the total amount of development with the project changes that is projected to occur under the Master Plan would be similar to or slightly less than what was described in the 2014 EIR. Therefore, impacts to

groundwater due to construction and operation of the project would be similar to those described in the 2014 EIR. No new or substantially more severe significant impacts would occur as a result of the project changes.

c) The proposed project changes would occur within the boundaries of the adopted Master Plan on or near sites proposed for development in the 2014 EIR that contain largely impervious surfaces. The proposed uses would be consistent in terms of size with facilities identified in the 2014 EIR and existing uses on the campus. Therefore, the proposed project changes are not expected to result in impacts to drainage patterns that are substantially different than those described in the 2014 EIR. Therefore, no new or substantially more severe significant drainage impacts are expected to occur as a result of the project changes.

d) See the response to c) above.

e) See the response to c) above.

f) See the response to a) above.

g) The proposed project changes would occur within the boundaries of the campus, which is not located in a flood zone or in an area subject to flood inundation hazards.

h) See the response to g) above.

i) See the response to g) above.

j) The project site is not located in an area subject to seiche, tsunami, or mudflow hazards.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measures MM-HYD-1 to MM-HYD-6 would continue to apply to the proposed project.

X.	2014 EIR Impact Determination for LAND USE AND PLANNING – Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Physically divide an established community?	☐	☐	☒	☐
b)	Conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project (including a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

2014 EIR Impact Discussion

a) Projects under the Master Plan could include development of new or renovation of existing office space for medical uses, retail space, open space, parking facilities, and possibly some workforce housing on the medical center campus. Although construction activities on the medical center campus could result in off-site impacts, all proposed development and facilities that could occur under the Master Plan would be constructed within the existing boundaries of the medical center campus. No new structures are proposed that would result in the demolition of residential uses in the surrounding neighborhood or divide an established neighborhood. Therefore, the temporary land use construction impacts would be less than significant. During operation, proposed facilities are medically related in nature and would be generally compatible with existing uses on the campus as well as land uses in the surrounding area. Additionally, proposed retail services and medically related services and open spaces would benefit the surrounding community, especially nearby residential neighborhoods. As noted above, proposed new development and facilities would be limited to the existing boundaries of the medical center campus. No surrounding residential neighborhoods would be divided, and no off-site residential buildings would be displaced as a result of implementation of the proposed Master Plan. Therefore, no significant impacts would occur during operation.

b) Buildout of the proposed Master Plan would result in significant impacts to historical resources and traffic and consequently would conflict with the relevant goals of the Northeast Community Plan (see Table 3.9-1 in the Draft EIR). Nonetheless, given the Master Plan would be consistent with most local land use plan policies and because the medical center campus is not subject to the city's land use regulations, the proposed Master Plan would not result in a significant land use impact due to conflicts with applicable land use plans, policies, or regulations.

c) The campus is not located in a habitat or natural community conservation plan area. Therefore, the adopted Master Plan would not conflict with any applicable habitat conservation plan or natural community conservation plan and no further discussion was warranted in the 2014 EIR.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) Site conditions in 2017 remain similar to those analyzed in 2014. The proposed two residential care facilities, central utility plant, and childcare facility would be generally consistent and compatible with existing uses and the Master Plan uses identified in the 2014 EIR. The proposed new facilities would be located within the boundaries of the existing campus and would not divide an existing community. No new impacts have been identified, and further analysis is not warranted.

b) The proposed project changes would not result in new or substantially more severe significant impacts that would conflict with the environmental policies in local land use plans. Also, see the responses to the other questions in this IS checklist.

c) There are no habitat or natural community conservation plans that encompass the project site. Therefore, no impacts would occur.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

XI.	**2014 EIR Impact Determination for MINERAL RESOURCES –** Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b)	Result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

2014 EIR Impact Discussion

a) The project site is not located in the administrative boundaries of an oil field. One active oil well, however, is located near the south end of the project site along Marengo Street.

b) The campus is not identified as a locally important mineral resource discovery site in local plans, including the conservation element of the general plan, specific plan, or other land use plan. As a consequence, no adverse impacts to mineral resources are anticipated.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) The proposed project changes would be located within the boundaries of the existing campus and adopted Master Plan and would not result in any new impacts to mineral resources. The proposed new facilities would not be located in the immediate vicinity of the active oil well along Marengo Street; thus, no adverse impacts on the existing oil well are anticipated. No other mineral resources are located in the immediate vicinity of the campus and proposed new facilities. No further analysis is warranted.

b) See the response to a) above.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

XII.	**2014 EIR Impact Determination for NOISE –** Would the project result in:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or ordinance or applicable standards of other agencies?	☒	☐	☐	☐
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f)	For a project in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

2014 EIR Impact Discussion

a) Increased noise levels are anticipated to occur in the vicinity of Master Plan facilities during the construction phase. The project site is located in close proximity to sensitive receptors both on the site and in the immediate vicinity. The nearest noise-sensitive land uses consist of medical uses on the site itself. Residential uses and a school, the Bravo Medical Magnet High School, are located within one quarter mile of the project site. For construction of facilities that do not involve pile driving and are located toward the interior of the project site, the noise levels at off-site residential properties would be below the applicable L_{max} threshold of 75 dBA. However, for construction that involves pile driving and/or occurs close to the project boundaries that are in the vicinity of residences (such as homes across Marengo Street or on Sichel Street), maximum noise levels would exceed 75 dBA. In addition, construction of new onsite facilities would occur in close proximity to existing medical center buildings that house patients and would exceed 85 dBA at these locations. These would be significant impacts.

While mitigation measures MM-NOI-1 through MM-NOI-6 and adherence to applicable noise standards will reduce construction noise levels, it will not eliminate the predicted noise impacts entirely; therefore, construction noise impacts are considered significant and unavoidable.

b) Heavy construction equipment has the potential to produce groundborne vibration levels that are perceptible to people in the surrounding area. Due to the proximity of proposed construction areas to both off-site and on-site sensitive receptors, it does not appear practical to avoid the operation of heavy construction equipment within 111 feet of these receptors, therefore the impact would be significant. While MM-NOI-6 would reduce construction vibration levels, it would not eliminate the predicted impacts entirely; therefore, construction vibration impacts are considered significant and unavoidable.

c) Future on-campus buildings (excluding “buildings with few or no occupants or where occupants are not likely to be affected by exterior noise”) constructed within 129 feet of Marengo Street, 172 feet of Mission Road, 46 feet of Zonal Avenue, 590 feet of I-5, or 482 feet of I-10 would be exposed to a noise level of 65

dB CNEL or greater from traffic noise, and would be required to comply with the CALGreen exterior-to-interior noise control standards for non-residential construction. Failure of any non-residential on-site buildings to comply with these standards would be a significant impact.

The Master Plan also proposes to locate new residential buildings (workforce housing) on parcels adjacent to Mission Road; these buildings would be subject to the interior noise standard of 45 dB L_{dn} or CNEL established by the County's Building Code. Compliance with these standards would ensure the noise impact on these residences would be less than significant.

d) Noise impacts from the parking lots and emergency vehicles associated with the project would be less than significant. Noise impacts from the introduction of new on-site mechanical equipment would increase ambient noise levels and exceed the applicable daytime and/or nighttime noise standards at off-site sensitive receptors, which would be a significant impact. Noise generated by large organized events would have the potential to increase ambient noise levels and exceed the applicable standards, especially during concerts or when other forms of amplified sound are used (public address systems, bullhorns, etc.), which would be a significant impact.

Project-generated traffic would increase traffic noise levels in the project vicinity by less than 3 dB CNEL adjacent to all roadways. Therefore, the traffic noise impact would be less than significant. New on-site mechanical equipment has the potential to produce a substantial permanent increase in ambient noise levels at nearby off-site noise-sensitive receptors, which would be a significant impact. Other operation noise sources consist of parking lot activity, emergency vehicles, and outdoor events. Neither parking lot activity nor emergency vehicles are expected to generate substantial permanent increases in ambient noise levels. Therefore, impacts from these sources would be less-than-significant.

The existing LAC+USC Medical Center includes two helipads for the transportation of patients to the emergency room by air ambulance. One helipad is on the roof top of the medical center building and one is on grade on the west portion of the campus. Typical flight operations are summarized as follows: a helicopter lands on the roof-top helipad and the flight staff takes the patient down the trauma elevators to the emergency room; after the patient and flight staff are in the hospital, the helicopter moves to the on-grade helistop to wait for the flight staff; flight staff departs the Emergency Department and walks to the on-grade helistop. On occasion, when there is already a helicopter on the roof, a patient is landed at the on-grade helipad and an ambulance takes them to the Emergency Room. Based on data from 2010, there are an average of approximately 27 landings per month.

Under the Master Plan, the at-grade helipad would be located to an as-yet unidentified new location within the campus. However, it is not anticipated that this change would lead to any increases in the overall number of landings at the site, or to the typical flight paths utilized by incoming helicopters. In addition, individual landings and on-site helicopter movements would be relatively short in duration. For these reasons, the long-term average noise levels generated by helicopters are expected to be relatively low compared to other existing noise sources and are not expected to change significantly as a result of the project. Therefore, the noise impacts associated with the helipads would be less-than-significant.

e) The proposed project is located more than 9 miles from the nearest airport, San Gabriel Valley (El Monte) Airport. Therefore, no noise impacts related to airport land use areas would occur and further discussion was not warranted in the 2014 EIR.

f) See the responses to d) and e) above.

2014 Adopted Mitigation Measures

MM-NOI-1: Reduce Construction Noise to the Extent Possible. The County shall implement the following noise reduction measures during construction:

- Construction activities should be limited to between the hours of 7 a.m. to 7 p.m. on Monday through Friday or 8 a.m. to 6 p.m. on Saturdays, and should not occur at any time on Sundays or legal holidays. Construction personnel should not be permitted on the job site, and material or equipment deliveries and collections should not be permitted outside of these hours.

- To the fullest extent practicable, the quietest available type of construction equipment should be used. Newer equipment is generally quieter than older equipment. The use of electric powered equipment is typically quieter

than diesel or gasoline powered equipment, and hydraulic powered equipment is typically quieter than pneumatic power.

- Where possible, impact pile driving should be replaced with other piling techniques, such as vibratory pile driving or drilled and poured-in-place piles.
- All mobile and fixed noise-producing equipment used on the proposed project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity.
- All construction equipment should be properly maintained. Poor maintenance of equipment typically causes excessive noise levels.
- All construction equipment, stationary and mobile, should be equipped with properly operating and maintained mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features that meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., arc welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment.
- All noisy equipment should be operated only when necessary, and should be switched off when not in use.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- To the extent practicable, temporary barriers should be employed around the project site and/or around noisy construction equipment. For barriers to be effective they should break the line-of site between the equipment and any noise-sensitive receiver. These barriers may be constructed as follows:
    - From commercially available acoustical panels lined with sound absorbing material (the sound absorptive faces of the panels should face the construction equipment).
    - From common construction materials such as plywood and lined with sound absorptive material (the sound absorptive material should face the construction equipment).
    - From acoustical blankets hung over or from a supporting frame. The blankets should provide a minimum sound transmission class (STC) rating of 28 and a minimum noise reduction coefficient (NRC) of 0.80 and should be firmly secured to the framework with the sound absorptive side of the blankets oriented towards the construction equipment. The blankets should be overlapped by at least 6 inches at seams and taped so that no gaps exist. The largest blankets available should be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier.
- Construction employees shall be trained in the proper operation and use of the equipment.
- Storage, staging, parking, and maintenance areas shall be located away from sensitive receptors. Where this is not possible, the storage of waste materials, earth, and other supplies should be positioned in a manner that will function as a noise barrier to the closest sensitive receivers.
- Stationary noise sources such as generators and compressors should be positioned as far away as possible from noise sensitive areas.
- Construction equipment shall be stored on the project site while in use. This will eliminate noise associated with repeated transportation of the equipment to and from the site.
- To the extent possible, haul roads should not be designated through noise-sensitive areas

MM-NOI-2: Design Non-Residential Project Buildings to Comply with CALGreen Exterior-to-Interior Noise

Control Standards. During the architectural and engineering design phase of each new non-residential building that would be located within the 65 dB CNEL contour of any of the surrounding roadways (i.e., within 129 feet of Marengo Street, 172 feet of Mission Road, 46 feet of Zonal Avenue, 590 feet of I-5, or 482 feet of I-10), and prior to the issuance of any building permits for the building, the County shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to comply with the State of California Green Building Standards Code. Such mitigation measures may include, but are not limited to: installation of sound-rated windows or upgrades to façade wall elements. It is noted that this mitigation measure does not apply to "buildings with few or no occupants or where occupants are not likely to be affected by exterior noise, as determined by the enforcement authority, such as factories, stadiums, storage, enclosed parking structures and utility buildings."

MM-NOI-3: Design Residential Project Buildings to Comply with the County of Los Angeles Building Code's Interior Noise Standards. During the architectural and engineering design phase of each new residential building to be developed as part of the project, and prior to the issuance of any building permits for the building, the County shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to comply with the County of Los Angeles Building Code's interior noise standard of 45 dB L_{dn} or CNEL. Such mitigation measures may include, but are not limited to: installation of sound-rated windows or upgrades to façade wall elements.

MM-NOI-4: Design Project Facilities to Ensure All Mechanical Equipment Complies with Chapter XI of the City of Los Angeles Municipal Code. During the architectural and engineering design phase of each new facility (building, central plant, parking structure, etc.) that would introduce new mechanical equipment to the project site, and prior to the issuance of any building permits for the facility, the County shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to ensure that the mechanical equipment complies with Chapter XI of the City of Los Angeles Municipal Code. Such recommendations may include, but are not limited to: changes in equipment locations, upgrades to central plant buildings, rooftop parapet walls, acoustical louvers or screens, or intake and exhaust silencers.

MM-NOI-5: Design and Manage Outdoor Use Areas to Ensure Organized Outdoor Events Comply with Chapter XI of the City of Los Angeles Municipal Code. Prior to the issuance of any building permits for outdoor use areas that are anticipated to host organized events such as outdoor markets, farmers markets, summer concerts and health marches, etc. the County shall retain an acoustical consultant to evaluate the design (event layout, sound system design, etc.) and operational event details (crowd sizes, times of operation, etc.) to ensure that such events will comply with Chapter XI of the City of Los Angeles Municipal Code. Such recommendations may include, but are not limited to: controls on crowd sizes and event times, and limits on sound system power levels.

MM-NOI-6: Reduce Construction-Generated Groundborne Vibration to the Extent Possible. The County shall implement the following vibration reduction measures during construction:

- Where possible, impact pile driving should be replaced with other piling techniques, such as vibratory pile driving or drilled and poured-in-place piles.
- To the extent possible, heavy construction equipment should not be operated within 111 feet of on-site or off-site sensitive receptors.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) The proposed project changes include two new residential care facilities, a new childcare facility to replace the existing one, a 20% reduction in the amount of research and development space that could occur on the campus, and a proposed new location for the new central utility plant. These changes, however, would not change the construction methods and equipment described in the 2014 EIR analysis. Because the 2014 analysis assumed that construction activity could potentially occur across the whole campus, the

noise and vibration effects of the new construction have already been considered and the same mitigation measures (MM-NOI-1 and MM-NOI-6) would continue to apply. The new residential care and childcare facilities would be considered noise-sensitive and would be covered by the site-wide analysis included in the 2014 EIR. Potential impacts to new noise-sensitive non-residential and residential buildings are addressed with the 2014 mitigation measures (MM-NOI-2 and MM-NOI-3), which would also apply to these new facilities. The new central plant would generate noise from mechanical equipment. Due to the proposed location of the plant in the center of the western portion of the campus, it is unlikely that significant noise levels would propagate to sensitive offsite receptors. Nonetheless, the 2014 mitigation measure to address potential mechanical equipment noise impacts (MM-NOI-4) would still apply to ensure mechanical equipment complies with Chapter XI of the City of Los Angeles Municipal Code. In addition, the proposed project changes would result in fewer daily vehicle trips than what was forecasted to occur in the 2014 EIR; therefore, traffic noise impacts would be slightly less than or similar to those described in the 2014 EIR. In summary, the impacts identified in the 2014 EIR would remain unchanged with the proposed 2017 project updates, all of the same mitigation measures would apply, and the level of impacts after mitigation would be the same as disclosed in the 2014 EIR.

b) The proposed project changes would not result in substantially different construction methods or a significant increase in the intensity of construction compared to what was described in the 2014 EIR. Additionally, the proposed new uses would be similar to those described in the 2014 EIR and existing uses on the campus. Therefore, no new or substantially more severe groundborne vibration or noise impacts would occur.

c) See the responses to a) and b) above.

d) The project site is not located within 2 miles of a public airport. No impacts would occur.

e) The helipad operations described and analyzed in the 2014 EIR would not change as a result of the proposed project changes. Therefore, no new or substantially more severe helicopter noise impacts would occur.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measures MM-NOI-1 to MM-NOI-6 would continue to apply to the proposed project.

XIII.	**2014 EIR Impact Determination for POPULATION AND HOUSING –** Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure)?	☐	☐	☒	☐
b)	Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

2014 EIR Impact Discussion

a) The number of construction workers employed and working on-site would vary over the course of the construction period and over the lifetime of the Master Plan. The County has a large pool of construction labor from which to draw within commuting distance of the project site. Additionally, because of the highly specialized nature of most construction projects, workers are likely to be employed on the job site only for as long as their skills are needed to complete a particular phase of the construction process. For those reasons, it is reasonable to assume that most construction workers would not relocate their households to work on proposed Master Plan development and improvement projects. Therefore, construction activities would not induce substantial population growth. Impacts would be less than significant.

The proposed Master Plan would include new and renovated facilities and could result in a net increase in the square footage of medical office, retail, and other building space. Given the net increase in square footage proposed in the 2014 Master Plan, it is estimated that the Master Plan could generate a net increase of 2,416 employees through 2040. The Master Plan may include the development of on-campus housing units to accommodate the biomedical research staff and temporary employees, thereby increasing the on-campus residential population.

One of the guiding principles of the Master Plan is to maximize access to LAC+USC Medical Center facilities. Accordingly, the project is likely to attract additional visitors and consequently may indirectly increase growth in the surrounding area. The increases in the employee population that could occur with anticipated development under the Master Plan would represent a relatively small percentage of the employment growth SCAG has projected in its regional and city forecasts. Additionally, the Master Plan does not include the extension of roads or other infrastructure improvements in undeveloped areas outside the boundaries of the campus that would indirectly induce substantial population growth in those areas. Therefore, growth impacts would be less than significant.

b) As mentioned above, all development and facilities proposed under the Master Plan would be constructed within the existing boundaries of the medical center campus. There are currently no permanent housing units on campus. Thus, no displacement of existing housing would occur as a result of anticipated development under the Master Plan.

c) See b) above.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) The proposed project includes two new residential care facilities that would provide 160 beds of temporary housing for recuperating medical patients. However, given these are temporary stay facilities and the proposed changes to the 2014 Master Plan would result in a slight reduction in the amount of new building square footage identified in the 2014 EIR (see Table 1), no new population and housing impacts would occur. Additionally, the induced growth as a result of the project changes would be less or similar to what was described in the 2014 EIR. The proposed changes are also within the existing boundaries of the medical center campus and therefore, would not displace any area residents or require the construction of replacement housing. The proposed project would not result in new population and housing impacts.

b) No housing would be displaced as a result of the proposed project changes.

c) No residents would be displaced as a result of the proposed project changes.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

XIV. 2014 EIR Impact Determination for PUBLIC SERVICES	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
i) Fire protection?	☐	☒	☐	☐
ii) Police protection?	☐	☒	☐	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

2014 EIR Impact Discussion

a) i) Master Plan development may result in intermittent access restrictions for emergency responders, including the Los Angeles Fire Department, Los Angeles Sheriff's Department, and the Los Angeles Police Department, during construction, a potentially significant impact. In order to ensure emergency access, traffic flow, and the emergency responders' ability to maintain adequate response times and other performance objectives, mitigation measure MM-PS-1 would be implemented.

It is unlikely that construction activities would result in the need for new or altered fire or police protection facilities to provide fire or police protection services to the campus during construction. Therefore, the temporary increased demand for these services during construction would be a less-than-significant impact.

Proposed development under the Master Plan would be generally consistent with current use(s) and is not planned to occur outside the existing campus boundaries. As a result, the Master Plan would not require the construction of new or altered fire facilities at Station 2 or any of the stations in the area that serve the surrounding communities. As part of the standard project approval process, the County of Los Angeles Fire Department would review and approve all project plans to ensure compliance with applicable fire codes and standards including ingress/access requirements, thereby minimizing the risk of increased operational fire hazards. Though LAFD is the primary emergency responder to the LAC_+USC Medical Center Campus, the plan check reviews will be done by the County of Los Angeles Fire Department's Engineering Section. Additionally, under the Master Plan, older vacant or underutilized buildings that pose an increased risk of fire hazard would be demolished. Additionally, the LAPD has indicated that proposed Master Plan development would not have a significant impact on police services in the Hollenbeck Area. As such, the Master Plan is not expected to require construction of new or altered facilities to maintain acceptable service ratios, response times, or other public facility performance objectives Therefore, operational impacts on fire protection and police services would be less than significant.

ii) See the response to a) i) above.

iii) Construction activities are not expected to result in the need for new or altered schools or school facilities to maintain acceptable personnel ratios or other performance and learning objectives, as construction employees are expected to draw from existing nearby communities. Construction impacts to educational facilities would be less than significant.

During operation, the projected development that could occur under the Master Plan could result in an increase of 2,416 employees on the campus. Given the campus' proximity to the freeway network and transit facilities, it's anticipated that these new employees would be dispersed over a wide geographic area within commuting distance of the campus. Thus, the new households formed by these new employees are not likely to result in significant increases in student enrollment at any one school in the region. The indirect impact of these employees on student enrollment is not expected to result in new or altered schools or school facilities to maintain acceptable personnel ratios or other performance and learning objectives. Operational impacts to educational facilities would be less than significant.

iv) Construction workers have limited opportunities to use local parks during the workday. Therefore, it's not anticipated that construction workers would result in a significant increase in demand for local park facilities. Construction impacts would be less than significant.

The Master Plan includes enhanced native grassland landscapes, lightly programmed terrain, and other developments intended to create accommodating open space for campus employees, patients, and visitors it is unlikely the proposed Master Plan would result in a significant increase in the use of and demand for local, off-campus park facilities. Thus, development that could occur under the Master Plan is not expected to require new or altered off-campus parks and recreation facilities to maintain acceptable service ratios or other performance objectives. Operational impacts to parks would be less than significant.

v) Similarly, given the large pool of construction workers within commuting distance of the project site, it is unlikely that construction workers would choose to permanently relocate to the area, and thereby increase the demand for local library services. Also, construction workers would have limited opportunities to use local libraries during the workday while working on campus. Thus, new or altered library facilities to maintain acceptable service ratios or other performance objectives are not anticipated and construction impacts to libraries would be less than significant.

The estimated increase in the campus employee population and increased visitors could result in an increased demand for local library services. However, this increase is not expected to be significant given the limited opportunity for employees to use local libraries during the work day and the fact that visitors to the campus are more likely to use campus facilities, than use the closest off-campus library, which is located approximately 1 mile from the medical center campus. Additionally, employees are likely to reside within a large geographic area within commuting distance of the campus, thus no one library in the surrounding region is expected to experience a significant increase in demand as a result of the proposed Master Plan. Therefore, operational impacts to libraries would be less than significant.

2014 Adopted Mitigation Measures

MM-PS-1: The Los Angeles County project manager and construction contractor shall regularly notify and coordinate with the LAFD, LASD and LAPD on project construction design, activities, and scheduling, including any on and off campus street or lane closures related to the proposed developments before construction begins.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) i) The proposed new facilities would be generally consistent with current use(s) and those described in the 2014 EIR and would occur within the existing campus boundaries. Additionally, the projected total building square footage that could occur under the Master Plan as a result of the project changes would be slightly less than what was forecast to occur in the 2014 EIR. Therefore, no new impacts to public services are anticipated and no further analysis is warranted.

ii) The proposed project changes would result in slightly less building square footage than what was analyzed in the 2014 EIR; therefore, fire protection services impacts would be slightly less than or similar to those described in the 2014 EIR. Also, see the response to a) i) above.

iii) See the response to a) i) above.

iv) See the response to a) i) above.

v) See the response to a) i) above.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measure MM-PS-1 would continue to apply to the proposed project.

XV. 2014 EIR Impact Determination for RECREATION		Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☒	☐
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☒	☐	☐	☐

2014 Recreation EIR Impact Determination and Discussion

a) The Master Plan is not expected to significantly increase the use of existing neighborhood parks or regional parks such that substantial physical deterioration of the facilities would occur or be accelerated. The proposed Master Plan includes the development of five new landscaped and open space areas on the campus to provide a variety of accessible outdoor experiences for public use and residents of adjacent communities. The provision of these additional active and passive recreational opportunities in the Northeast Los Angeles and Boyle Heights Community Plan areas would meet the needs of the residents in the community and be consistent with the goals and objectives outlined in the County and city general plans. Therefore, it is not expected that growth in on-campus patient, visitor, or employee populations would result in a significant increase in the use of existing local parks or substantial physical deterioration of park facilities. Additionally, the increase in the number of households associated with increased on-campus employee populations would most likely be dispersed over a wide geographic area within commuting distance of the campus; therefore, a concentrated or substantially intensified use of local parks is unlikely. Impacts would be less than significant.

b) Construction of new landscaped open space areas could result in noise and air quality impacts on nearby sensitive receptors (also see Air Quality and Noise and Vibration discussion above). Although mitigation is proposed to reduce these impacts, they would remain significant after mitigation.

During project operations, it is not expected that routine daily use of new landscaped and open space areas would result in significant operational impacts on the environment. However, noise generated by large organized events would have the potential to exceed applicable noise standards. Implementation of MM-NOI-5 would mitigate some of this impact related to noise. Demand got recreational facilities during project operations is not expected to significantly increase due to additional employees being dispersed over a wide geographic area.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) Since the proposed project changes would result in a slight reduction in the amount of new building square footage identified in the 2014 EIR, the increase in on-campus patient, visitor, or employee populations that could occur as a result of the project changes would be similar to or slightly less than those identified in the 2014 EIR. Therefore, no new impacts to recreational facilities beyond what were identified in the 2014 EIR are anticipated and no further analysis is warranted.

b) The proposed project changes do not include the construction of additional recreational facilities beyond what was described in the 2014 EIR. No new or substantially more severe significant impacts would occur.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

XVI.	**2014 EIR Impact Determination for TRANSPORTATION/TRAFFIC –** Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel, and relevant components of the circulation system, including intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b)	Conflict with an applicable congestion management program, including LOS and travel demand measures, or other standards established by the county Congestion Management Agency for designated roads or highways?	☒	☐	☐	☐
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that would result in substantial safety risks?	☐	☐	☐	☒
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e)	Result in inadequate emergency access?	☐	☐	☒	☐
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

2014 EIR Impact Discussion

a) Construction of facilities under the Master Plan would result in increased vehicle trips to the site and may alter access to the existing LAC+USC Medical Center campus. The extent of lane and sidewalk closures will not be known until individual development projects are proposed and project plans are developed. Under MM-TRAF-1, construction traffic control measures would be developed and implemented and would reduce construction impacts related to conflicts with applicable plans, ordinances, or policies to less than significant.

During project operations, the facilities proposed under the Master Plan would result in significant impacts on the following four intersections under existing baseline plus project conditions: (1) Daly Street and Main Street (PM), (2) State Street and Cesar E. Chavez Avenue (PM), (3) State Street and Marengo Street (AM and PM) and (3) Soto Street and Marengo Street (AM). Implementation of MM-TRAF-2 and MM-TRAF-3 would reduce significant impacts at the State Street/Marengo Street to a less-than-significant level. However, mitigation measure MM-TRAF-2 is subject to LADOT's acceptance and approval. If LADOT determines that one or more of the proposed improvements are not feasible, the impact at intersection 13 (State Street and Marengo Street) would remain significant and unavoidable.

b) See a) above.

c) The Master Plan would not include any components that would result in a change in air traffic patterns, including either an increase in air traffic levels or a change in location that would result in substantial safety risks. Impacts would be less than significant.

d) Construction activities would increase the mix of heavy construction vehicles and general purpose traffic and could result in an increase in safety hazards due to a higher proportion of heavy trucks. Additionally, the impact of construction-generated traffic on safety could be significant for projects that would require roadways restrictions, lane closures, and similar actions. However, implementation of mitigation measure MM-TRAF-1 would reduce any safety impacts to a less-than-significant level.

During operation of Master Plan facilities, upgrades to the campus would improve design features for campus visitors and employees. No sharp curves or dangerous intersections would be created, nor would incompatible uses be introduced. Therefore, operational traffic hazard impacts would be less than significant.

e) Construction could require temporary road or lane closures. This, in turn, would result in a decrease in roadway capacity and increased congestion. However, coordination with EMS providers that serve the campus and surrounding communities, as described in mitigation measure MM-TRAF-1, would ensure that impacts on emergency access during construction would be less than significant. Operation of Master Plan facilities would not affect emergency access to the campus, as described under the discussion above for public services. Therefore, impacts would be less than significant.

f) The Master Plan would improve pedestrian mobility within and to the project site. The Master Plan would not result in changes to the public transportation system that would conflict with adopted policies plans or programs, and would actually enhance connections to public transportation. However, construction of Master Plan facilities could involve intermittent lane and sidewalk closures. These closures would occur for limited periods of time during construction of individual projects proposed under the Master Plan. Traffic operations during these closures would deteriorate. The delays could be substantial for vehicular traffic, mass transit, bicycle riders, and pedestrians. Implementation of MM-TRAF-1 would mitigate potential construction traffic impacts and impacts related to policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities to a less than significant level.

During operation, no significant impacts on the transit system are anticipated. Given the frequency and density of existing bus transit service in proximity to the project site, the incremental increase in the number of transit riders (on average, 3 or fewer passengers per bus) resulting from the project is anticipated to result in a less-than-significant impact on the transit lines that serve the area. Furthermore, implementation of the Master Plan would be supportive of build out of the local and regional bicycle network.

Additional parking would also be provided under the Master Plan. Development of the Master Plan would result in a net increase in the number of parking spaces compared with what is currently available on the campus and the removal of existing parking would be coordinated to ensure that there would be adequate parking for employees, patients, and visitors throughout the construction period. Consequently, the impact on parking demand on the campus during construction would be minimized. Therefore, construction parking impacts would be less than significant.

2014 Adopted Mitigation Measures

MM-TRAF-1: The County shall develop and implement traffic control measures for Master Plan projects that would result in lane or sidewalk closures, removal of parking, or similar traffic disruptions. Temporary traffic control during construction shall meet the requirements of the California Manual on Traffic Control Devices (CA-MUTCD). Daytime closures shall be covered by the applications shown in Chapter 6 of the manual. Overnight closures, long-term closures, and detours shall require a Traffic Control Plan, which shall be prepared as part of the project design package according to CA-MUTCD requirements. The Traffic Control Plan may include, but is not limited to, the elements listed below. Note that some of these elements may not be feasible or appropriate in all circumstances. The project-level environmental analysis shall identify the appropriate measures for each project.

- Provide a roadway layout that shows the locations of construction activity and surrounding roadways to be used as detour routes, including special signage.
- Establish detour routes in coordination with the City of Los Angeles to minimize disturbances to local traffic conditions; review potential detour routes to make sure adequate capacity is available.
- Avoid creating additional delay at intersections that are currently operating under congested conditions either by choosing haul routes that avoid these locations (such as choosing haul routes that avoid the State

Street/Marengo Street and State Street/Cesar Chavez Avenue intersections) or constructing during non-peak times of day (peak periods are generally 7 a.m. to 9 a.m. and 4 p.m. to 6 p.m., Monday through Friday).

- Maintain access to existing residences at all times.
- Work with LADOT, LASD, LAFD, and LAPD to coordinate all construction-related plans and minimize disturbances to local EMS providers; ensure that alternative evacuation and emergency routes are designed to maintain response times during construction.
- Provide adequate off-street parking areas at designated staging areas for construction-related vehicles.
- Work with local and regional transit providers to maintain access and circulation routes to existing stops and stations during construction phases and identify appropriate detours to provide traffic rerouting during construction while minimizing disturbance to bus services.

Work with the City of Los Angeles to maintain continuity and operation of existing pedestrian and bicycle facilities during construction.

MM-TRAF-2: To mitigate the significant traffic impact at the intersection of State Street and Marengo Street (study intersection #13) during the AM and PM peak hours, the southbound approach on State Street (within the LAC+USC Medical Center) shall be widened and reconfigured to provide one left-turn lane, one through lane, and one shared through/right-turn lane. Traffic signal enhancements, such as additional closed-circuit television cameras, should also be considered. In addition, the existing westbound bus stop at this intersection on Marengo Street shall be relocated eastward to allow for the introduction of a separate westbound right-turn lane. The County shall consult with affected transit providers as well as LADOT to coordinate relocation of this bus stop. All elements of this mitigation measure need to be implemented to mitigate the significant impact.

MM-TRAF-3: The County shall explore implementation of the following TDM measures to further reduce vehicle trips:

- provide bicycle parking for new development that exceeds the County's code requirement;
- provide other bicycle-supportive amenities such as bicycle lockers;
- locate a station of a bicycle-sharing system on-site;
- expand the County-operated Wellness Center Shuttle to include more stops on or near the site; and,
- work cooperatively with other transit providers (Metro, LADOT, Metrolink, Foothill Transit, and USC) to establish new transit stops or stations or to upgrade existing transit stops adjacent to the Medical Center or in the local area.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) The proposed project changes would not result in new impacts that were not described in the 2014 EIR and would not result in substantially greater impacts than those identified in the EIR. The proposed changes to the 2014 Master Plan would result in a minor overall decrease of 409 fewer daily vehicle trips, including 17 fewer trips in the AM peak hour and 17 fewer trips in the PM peak hour (see 10/23/17 traffic memorandum attached to this Initial Study). Therefore, no new significant traffic impacts, or any change in impacts requiring revisions to the adopted mitigation measures MM-TRAF-1 through MM-TRAF-3 would occur. Further analysis is not warranted.

b) See the response to a) above.

c) The proposed project changes would result in no changes to air traffic patterns.

d) The proposed project changes would result in no changes to existing off-campus roadways. Minor changes to existing campus driveways and internal circulation may be required to accommodate the proposed new facilities. However, these changes are not expected to result in new roadway hazards or introduce incompatible uses that could result in new hazards.

e) The proposed new uses would be constructed within the campus on or in the immediate vicinity of the

sites proposed for redevelopment in the adopted Master Plan. Therefore, construction impacts on emergency vehicle access are expected to be similar to those described in the 2014 EIR. No new or substantially more severe significant impacts are anticipated.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measures MM-TRAF-1 to MM-TRAF-3 would continue to apply to the proposed project.

XVII.	**2014 EIR Impact Determination for TRIBAL CULTURAL RESOURCES** – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native America tribe, and that is:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 50201 (k), or	☐	☐	☐	☒
b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

2014 EIR Impact Discussion

a) The requirement to evaluate impacts to tribal cultural resources in CEQA documents was implemented subsequent to completion of the 2014 EIR. Nonetheless, no tribal cultural resources were identified as being present in the immediate vicinity (0.25 miles) of the campus during preparation of the 2014 EIR. Therefore, no impacts are anticipated.

b) See the response to a) above.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) The proposed project changes would occur within the boundaries of the campus. As a consequence and because no tribal cultural resources have been identified in the immediate vicinity of the campus, no impacts would occur as result of the proposed project changes. Further analysis is not warranted.

b) See the response to a) above.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

XVIII.	2014 EIR Impact Determination for UTILITIES AND SERVICE SYSTEMS – Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b)	Require or result in the construction of new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c)	Require or result in the construction of new stormwater drainage facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☒	☐	☐	☐
e)	Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to existing commitments?	☒	☐	☐	☐
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g)	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
h)	Result in inefficient, wasteful or unnecessary consumption of energy?	☐	☐	☒	☐

2014 EIR Impact Discussion

a) The Master Plan would introduce new multi-story structures onto the site, which would increase wastewater usage compared to existing conditions. The project site is located in an urban area that is currently served by wastewater infrastructure. During construction of individual projects implemented under the Master Plan, wastewater would be generated by construction workers. Implementation of the Master Plan could result in a net increase of 173,382 gpd of wastewater, which represents less than 0.06% of the average daily flows in the Hyperion Sewer System. The amount would be relatively small and substantially less than the 501,393 gallons per day of wastewater generated by existing uses on the campus and would not exceed the wastewater treatment requirements of the Los Angeles RWQCB or the capacities of the local sewer lines and wastewater treatment facilities that serve the project site (Bureau of Sanitation, 2014). Wastewater generated by future campus uses would be conveyed via sewer lines to the Hyperion Treatment Plant for treatment to full secondary standards. The treated wastewater, which is discharged via a 5-mile ocean outfall into Santa Monica Bay, is subject to state waste discharge requirements and federal NPDES permit requirements. Therefore, the Master Plan would not generate wastewater that would exceed Los Angeles RWQCB's wastewater treatment requirements. Therefore, construction and operation impacts related to wastewater treatment requirements would be less than significant.

b) See a) above.

c) During construction of individual projects, an SWPPP incorporating BMPs for erosion control, a conceptual grading plan and the proposed stormwater management system that was developed for the Master Plan

in accordance with Los Angeles County LID Standards would be implemented. New grading required to construct facilities under the Master Plan would closely follow existing contours and direct stormwater runoff toward the center of the west campus. Therefore, it is not expected that Master Plan construction activities would substantially increase stormwater runoff from the project site and require new or expanded off-campus stormwater drainage facilities. Potential construction impacts on stormwater facilities would be less than significant.

To ensure that proposed Master Plan development projects mitigate runoff in a manner that captures rainwater at its source, a large engineered wetland is proposed along the pedestrian spine at the lowest point on the campus. The wetland would serve as a stormwater treatment strategy and would be designed to be an accessible open space enhancement. As a result of the project and the incorporation of LID features, the amount of impervious cover, currently 95%, would decrease and landscaped areas would increase. Thus, impacts related to the construction of new off-campus stormwater drainage facilities or the expansion of existing facilities would be less than significant.

d) Proposed development under the Master Plan would increase the consumption of various utilities including water and natural gas. The Los Angeles Department of Water and Power's Urban Water Management Plan identifies future water supply and demand in their service area through the year 2035. Therefore, it's not known whether future water supplies beyond the year 2035 would be sufficient to meet the needs of the Master Plan projects constructed far in the future, i.e., beyond the year 2035. Therefore future water supply impacts, beyond the year 2035, are considered to be significant and unavoidable. Similarly, existing SoCalGas forecasts of future natural gas supplies and demand extend to the year 2030. If insufficient supplies exist for Master Plan projects beyond the year 2030, the impact would be significant and unavoidable.

e) See a) above.

f) There are several major landfills in the Los Angeles metropolitan area that serve the project site. Major landfills are defined as those facilities that receive more than 250,000 tons of solid waste per year. Given demolition debris and solid waste generated by other construction activities would be finite and limited to the construction periods, existing landfills have sufficient long-term permitted capacity to accommodate construction generated solid waste and impacts related to landfills would be less than significant. During operation, the proposed project would result in a net increase of 10,270 pounds of solid waste a day. Sunshine Canyon, the largest solid waste disposal facility in Los Angeles, has a remaining capacity of 74.37 millions of tons with a remaining life of 20 years. Therefore, it is expected that the project site would be served by a landfill that has sufficient permitted capacity to accommodate the project's solid waste disposal needs. Impacts related to solid waste disposal would be less than significant.

g) See f) above.

h) The threshold related to inefficient, wasteful or unnecessary consumption of energy was added to the CEQA checklist after approval of the 2014 EIR and thereby was not evaluated; however, given proposed construction BMPs and implementation of building measures to conserve resources, development of project facilities and improvements are not expected to result in the wasteful or inefficient consumption of energy.

2014 Adopted Mitigation Measures

MM-UTL-1: In conjunction with preparation of a subsequent CEQA environmental document for any future development project under the Master Plan proposed in 2035 and beyond that is defined as a "water-demand project" in Section 15155 of the CEQA Guidelines, the County shall request, pursuant to Section 15155, that the water provider determine whether the projected water demand associated with the project was included in the most recently adopted urban water management plan. If required pursuant to Section 15155 and SB 610, the County shall request that LADWP prepare a water assessment for the proposed project. The County shall determine, pursuant to Section 15155, whether projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses.

MM-UTL-2: Prior to issuance of a building permit for any future development project under the Master Plan that could result in an increase in wastewater generation, the County shall coordinate with the City of Los Angeles Bureau of Sanitation to conduct further detailed gauging and evaluation to identify a specific sewer connection point with sufficient capacity. If the public sewer has insufficient capacity, then the County shall be required to build a sewer line to a point in the sewer system with sufficient capacity.

2017 Project Changes Impact Discussion

1. Would the proposed project changes result in effects that were not examined in the 2014 EIR?

No.

a) Wastewater generated by on-campus and proposed new facilities would continue to be conveyed by local sewer lines to City of Los Angeles wastewater treatment plant facilities. The proposed project changes would not increase the quantity of wastewater projected to occur under the Master Plan or change the characteristics of the wastewater that would be generated by campus facilities. Consequently, new or substantially more severe significant impacts would not occur.

b) Given the proposed project changes would result in a slight decrease in total building square footage compared to the projected development identified in the 2014 EIR, and given the proposed new facilities would not differ substantially from those identified in the EIR, no new or substantially greater utility impacts than those described in the EIR would occur. Existing water supply and sewer infrastructure in streets surrounding the proposed project are still anticipated to have adequate capacity to serve the proposed project, and no new infrastructure would be required to extend water or sewer service or increase treatment capacity. Additionally, the proposed project would continue to be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

c) As discussed in the response to b) above, the proposed project changes are not expected to result in an increase in the demand for utilities or increase the need for utility infrastructure, including stormwater drainage facilities, beyond what was identified in the 2014 EIR.

d) See the response to a), b), and c) above.

e) See the response to a), b), and c) above.

f) See the response to b) and c) above.

g) The proposed project changes, and other development under the Master Plan, would comply with solid waste statutes and regulations. No new or substantially more severe significant impacts would occur.

h) See the response to b) above.

2. If Yes, are those effects significant or substantially more severe than the effects identified in the 2014 EIR?

Not applicable.

Mitigation Measures

Mitigation measures MM-UTL-1 and MM-UTL-2 would continue to apply to the proposed project.

XVIV.	2014 EIR - MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less-than-Significant Impact with Mitigation	Less-than-Significant Impact	No Impact
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? **2014 EIR Impact Discussion** As discussed in the responses to the checklist questions above, project construction could result in the removal of palm trees or other roosting sites for Western yellow bats, a potentially significant but mitigable impact. **2017 Project Changes Impact Discussion** The impacts that could occur as a result of the project changes would be similar to those described in the 2014 EIR.	☐	☒	☐	☒
b)	Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) **2014 EIR Impact Discussion** The 2014 EIR determined that the proposed Master Plan in conjunction with other past, present, and probable future projects could result in significant cumulative impacts, after mitigation, in the following areas: air quality, greenhouse gases, noise, traffic, and utilities. **2017 Project Changes Impact Discussion** Given the proposed project changes would result in a slight reduction in the projected total amount of building square footage under the Master Plan compared to what was identified in the 2014 EIR and because the proposed new facilities would be comparable to the uses proposed in the 2014 Master Plan EIR, the project changes would not result in new or substantially more severe cumulative impacts.	☒	☐	☐	☐
c)	Does the project have environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

2014 EIR Impact Discussion

The 2014 EIR determined that Master Plan development could result in air quality and noise impacts that could cause substantial adverse effects on human beings and that these impacts would still be significant after implementation of proposed mitigation measures.

2017 Project Changes Impact Discussion

With proposed project changes, the impacts would be similar to those described in the 2014 EIR. No new significant or substantially more severe impacts to human beings would occur that were not identified in the 2014 EIR.

CONCLUSION

Based on the analyses conducted above, it has been determined by the lead agency, the County of Los Angeles, that the proposed changes (i.e., activities) to the 2014 LAC+UCLA Medical Center Campus Master Plan are within the scope of the Master Plan approved in November of 2014 and the 2014 Program EIR for the Master Plan adequately described the activities for the purposes of CEQA.

.

Appendix A- Traffic Memorandum

FEHR PEERS

MEMORANDUM

Date: October 23, 2017

To: Lee Lisecki, ICF International

From: Netai Basu and Lauren Deaderick

Subject: Traffic Impact Anal Update for LAC+USC Medical Center Master Plan Revisions

LA17 - 2979

In November 2014 the Board of Supervisors of Los Angeles County approved the "LAC+USC Medical Center Campus Master Plan" and certified the environmental impact report (2014 EIR) for project. The master plan is intended to guide future development on the campus as well as improvements to existing facilities. Los Angeles County is now proposing to revise the mix of land uses on the campus and where they would be located. The purpose of this memorandum is to update the project trip generation estimates in the 2014 EIR to reflect the proposed changes to the approved master plan and to determine whether the changes may result in new significant traffic impacts.

Approved Master Plan – Land Uses and Trip Generation Estimates

The 2014 EIR analyzed the off-site traffic impacts associated with long-term development and redevelopment that would result in the mix of land uses listed below.

- 450 additional hospital beds;
- 85,000 square feet of wellness-oriented community meeting space and community-serving uses;
- 20,000 square feet of wellness-oriented community retail space;
- 40,000 square feet of new utility plant and facilities;
- 200,000 square feet of outpatient clinics;
- 265,000 square feet of professional and administration offices; and
- 635,000 square feet of biotech research and development space.

The existing child care facility and College of Nursing would be relocated on the campus but would maintain their current enrollment capacities. For reference, the 2014 Master Plan is illustrated in Figure 1.

The analysis in the 2014 EIR included trip generation estimates for the master plan at build-out that used rates found in the Institute of Transportation Engineers (ITE) *Trip Generation Handbook, 9th Edition* (2012). The trip generation estimates for the improved existing and new land uses, as approved, are presented in Table 1. This table is identical to Table 5 in Appendix G to the draft 2014 EIR. The net external daily trips are 3,944, including 711 AM trips and 502 PM trips. The 2014 EIR included traffic mitigation strategies to ensure the significant impacts from the added trip generation are reduced.

Proposed Revisions to the Master Plan – Land Uses and Trip Generation Estimates

The following revisions are currently proposed to the approved campus master plan:

1) Construction of a crisis residential care facility with 64 beds. The staffing would require 72 clinical staff from 8:00 AM to 5:00 PM, 8 residential staff from 7:00 AM to 3:30 PM, 50 employees from 3:00 PM to 11:00 AM and 20 employees from 11:00 PM to 7:30 AM.
2) Construction of a recuperative care facility with 96 beds. The staffing would require 25 to 30 employees from 8:00 AM to 4:30 PM, 10 to 15 employees from 4:00 PM to 12:30 AM and 10 to 15 employees from midnight to 8:30 AM.
3) A larger replacement childcare facility that would increase the capacity of the existing facility from 72 to 84 children (12 additional children). Two sites are under consideration.
4) A reduction of 127,000 square feet (20%) in the approved new biotech research and development space, resulting in 508,000 square feet of this land use.
5) A different location within the campus for the new utility plant.

The proposed location of the replacement utility plant is shown in Figure 2. Figure 3 shows the site of the proposed residential treatment facilities and two sites where the child care facility may be relocated.

Trip generation estimates for the proposed new residential care facilities are based primarily on planned staffing levels and shift change times because standard trip generation rates are not available for these uses. Data collected during the master plan process and subsequent environmental clearance showed that the campus has an average vehicle ridership factor of 1.37,

which accounts for ridesharing as well as commute trips by bicycle and transit. This factor was applied to the planned staffing levels and shift change times to develop estimates of inbound and outbound trips by time of day. These estimates are shown in Table 2, which graphically illustrates the methodology used to develop them. Together, the residential care facilities are estimated to generate 308 daily trips, including 90 trips in the AM peak hour and 75 trips in the PM peak hour.

Standard trip generation rates were used to estimate trips to and from the relocated child care facility, which would have a net capacity increase of 12 children. Information obtained in the earlier planning process is that approximately half of the children are from the community (new external trips) and approximately half are children of employees at the LAC+USC Medical Center. Standard trip generation rates were also used to estimate the reduction in trips, relative to the approved project analyzed in the 2014 EIR, due to the reduction in biotech research and development space.

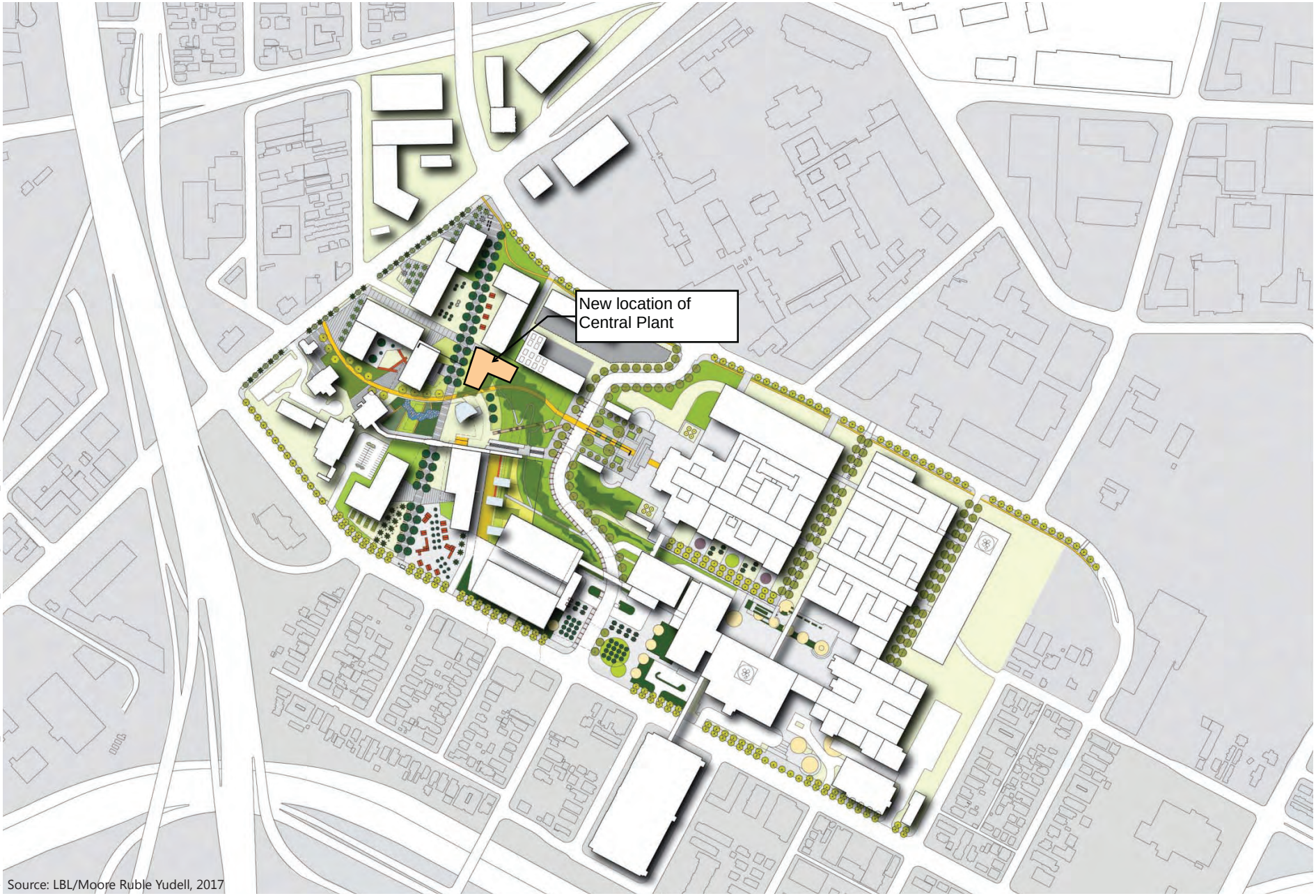
Table 3 presents updated trip generation estimates for the campus master plan with the proposed changes: 3,535 daily trips including 694 AM peak hour trips and 485 PM peak hour trips. When the trip generation estimates of the revised master plan are compared to those of the approved master plan, the proposed project would result in slightly fewer external vehicle trips. It is estimated there will be 409 less daily trips under the proposed project, including 17 fewer trips in the AM peak hour and 17 few trips in the PM peak hour.

Conclusion

The proposed revisions to the LAC+USC Medical Center master plan would result in a minor overall decrease in external vehicle trips, relative to the current master plan that was approved in 2014. For this reason it is concluded that the revised master plan would not result in new significant traffic impacts, or any change in impacts require revisions to the adopted mitigation measures for the traffic impacts identified in the 2014 EIR.

Figure 1

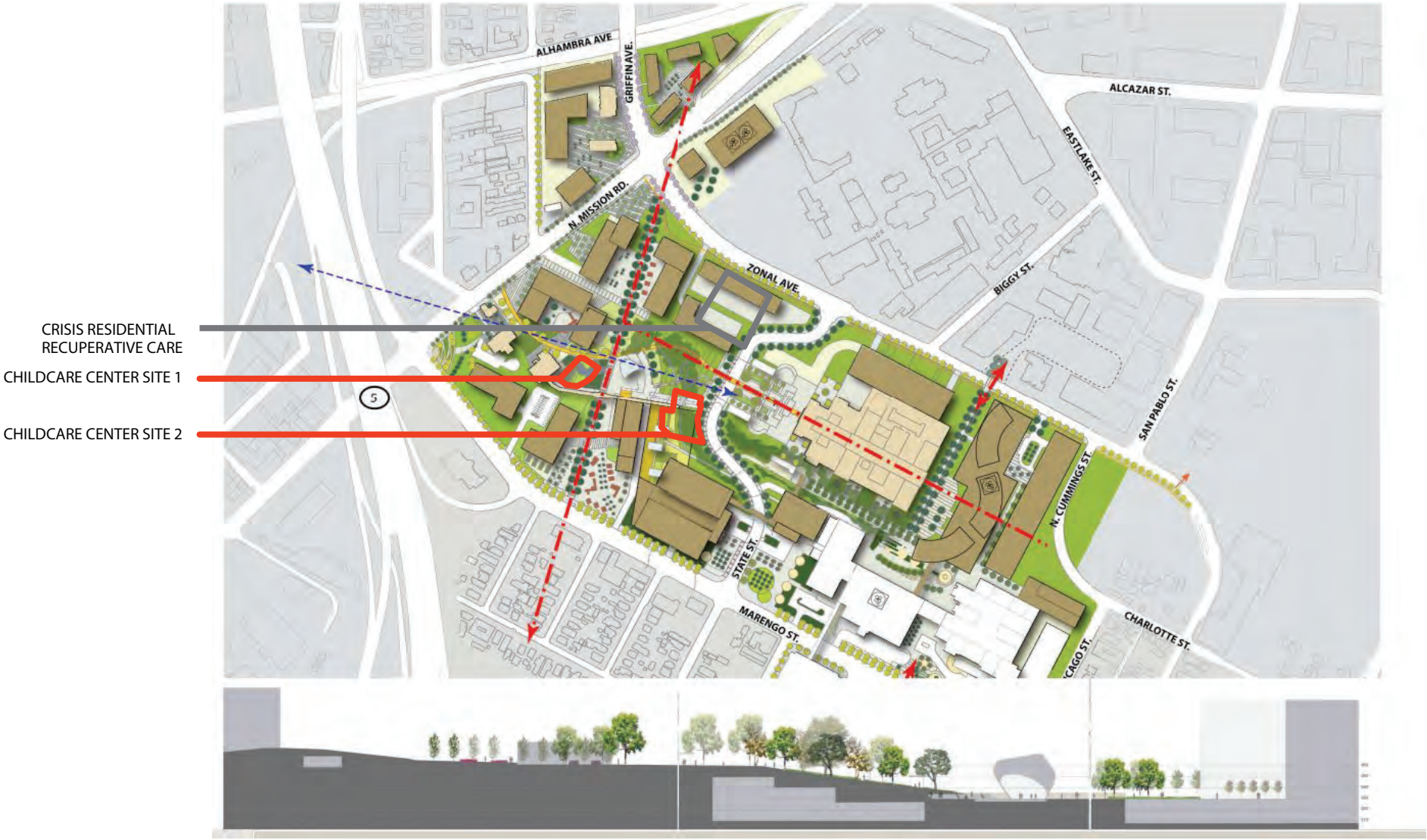
LAC+USC Illustrative Master Plan



Source: LBL/Moore Ruble Yudell, 2017

Figure 2

Proposed Location of Central Plant



Source: NAC Architecture, 2017

Figure 3

Proposed Location of Residential Treatment and Child Care Facilities

TABLE 1
PROJECT TRIP GENERATION ESTIMATES - LAC + USC MEDICAL CENTER CAMPUS MASTER PLAN (2014)

Land Use	Size	Trip Generation Rates [a]									Estimated Trip Generation						
		ITE Code	Daily Rate	AM Peak Hour Rate	AM In	AM Out	PM Peak Hour Rate	PM In	PM Out	Daily	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
Hospital Addition	450.000 beds	610	12.94	1.32	72%	28%	1.42	33%	67%	5,823	428	166	594	211	428	639
Less: Internal Trips credit	*-15% [b]*	*Hospital*								*(873)*	*(64)*	*(25)*	*(89)*	*(32)*	*(64)*	*(96)*
Less: Transit credit	*-15% [c]*									*(743)*	*(55)*	*(21)*	*(76)*	*(27)*	*(54)*	*(81)*
Net External Vehicle Trips										4,207	309	120	429	152	310	462
Wellness-Oriented Community Meeting Space & Community-Serving Uses	85.000 ksf	495	33.82	2.05	66%	34%	2.74	49%	51%	2,875	115	59	174	114	119	233
Less: Internal Trips credit	*-15% [b]*	*Recreational Community*								*(431)*	*(17)*	*(9)*	*(26)*	*(17)*	*(18)*	*(35)*
Less: Transit credit	*-15% [c]*	*Center*								*(367)*	*(14)*	*(8)*	*(22)*	*(15)*	*(15)*	*(30)*
Driveway Trips										2,077	84	42	126	82	86	168
Less: Pass-By credit	*-20% [d]*									*(415)*	*(17)*	*(8)*	*(25)*	*(17)*	*(17)*	*(34)*
Net External Vehicle Trips										1,662	67	34	101	65	69	134
Wellness-Oriented Community Retail Space [e]	20.000 ksf	826	44.32	0.70	62%	38%	2.71	44%	56%	886	9	5	14	24	30	54
Less: Internal Trips credit	*-15% [b]*	*Specialty Retail*								*(133)*	*(1)*	*(1)*	*(2)*	*(4)*	*(4)*	*(8)*
Less: Transit credit	*-15% [c]*									*(113)*	*(1)*	*(1)*	*(2)*	*(3)*	*(4)*	*(7)*
Driveway Trips										640	7	3	10	17	22	39
Less: Pass-By credit	*-10% [d]*									*(64)*	*(1)*	*0*	*(1)*	*(2)*	*(2)*	*(4)*
Net External Vehicle Trips										576	6	3	9	15	20	35
New Utility Plant and Facilities [f]	40.000 ksf	170	[f]	0.80	90%	10%	0.76	45%	55%	124	29	3	32	14	16	30
Less: Internal Trips credit	*-15% [b]*	*Utilities*								*(19)*	*(5)*	*0*	*(5)*	*(2)*	*(3)*	*(5)*
Less: Transit credit	*-15% [c]*									*(16)*	*(4)*	*0*	*(4)*	*(2)*	*(2)*	*(4)*
Net External Vehicle Trips										89	20	3	23	10	11	21
Outpatient Clinics	200.000 ksf	720	36.13	2.39	79%	21%	3.57	28%	72%	7,226	378	100	478	200	514	714
Less: Internal Trips credit	*-15% [b]*	*Medical Office Building*								*(1,084)*	*(57)*	*(15)*	*(72)*	*(30)*	*(77)*	*(107)*
Less: Transit credit	*-15% [c]*									*(921)*	*(48)*	*(13)*	*(61)*	*(25)*	*(66)*	*(91)*
Net External Vehicle Trips										5,221	273	72	345	145	371	516
Professional/Administrative Offices	265.000 ksf	710	11.03	[g]	88%	12%	[g]	17%	83%	2,923	367	50	417	64	311	375
Less: Internal Trips credit	*-15% [b]*	*General Office Building*								*(438)*	*(55)*	*(8)*	*(63)*	*(10)*	*(46)*	*(56)*
Less: Transit credit	*-15% [c]*									*(373)*	*(47)*	*(6)*	*(53)*	*(8)*	*(40)*	*(48)*
Net External Vehicle Trips										2,112	265	36	301	46	225	271
Partial Buildout (50%) of Biotech Research and Development [h]	635.000 ksf	760	8.11	1.22	83%	17%	1.07	15%	85%	5,150	643	132	775	102	577	679
Less: Internal Trips credit	*-15% [b]*	*Research & Development*								*(773)*	*(96)*	*(20)*	*(116)*	*(15)*	*(87)*	*(102)*
Less: Transit credit	*-15% [c]*									*(657)*	*(82)*	*(17)*	*(99)*	*(13)*	*(74)*	*(87)*
Net External Vehicle Trips										3,720	465	95	560	74	416	490
DRIVEWAY TRIPS										18,066	1,423	371	1,794	526	1,441	1,967
EXTERNAL VEHICLE TRIPS										**17,587**	**1,405**	**363**	**1,768**	**507**	**1,422**	**1,929**
EXISTING TRIPS TO BE REMOVED [i]																
General Office Space	197.288 ksf	710	11.03	[g]	88%	12%	[g]	17%	83%	*(2,176)*	*(290)*	*(40)*	*(330)*	*(51)*	*(248)*	*(299)*
Laboratory and Clinic Buildings	457.727 ksf	720	36.13	2.39	79%	21%	3.57	28%	72%	*(16,538)*	*(864)*	*(230)*	*(1,094)*	*(458)*	*(1,176)*	*(1,634)*
Carpenter's Mill [j]	31.000 ksf	120	1.50	0.51	88%	12%	0.68	12%	88%	*(47)*	*(14)*	*(2)*	*(16)*	*(3)*	*(18)*	*(21)*
Central Power Plant and Cooling Towers	20.938 ksf	170	[f]	0.80	90%	10%	0.76	45%	55%	*(66)*	*(15)*	*(2)*	*(17)*	*(7)*	*(9)*	*(16)*
Warehouse and Storage Trailers	15.756 ksf	150	3.56	0.30	79%	21%	0.32	25%	75%	*(56)*	*(4)*	*(1)*	*(5)*	*(1)*	*(4)*	*(5)*
Existing Trips To Be Removed										*(18,883)*	*(1,187)*	*(275)*	*(1,462)*	*(520)*	*(1,455)*	*(1,975)*
Less: Internal Trips credit	*-15% [b]*									*2,832*	*178*	*41*	*219*	*78*	*218*	*296*
Less: Transit credit	*-15% [c]*									*2,408*	*151*	*35*	*186*	*66*	*186*	*252*
TOTAL EXISTING VEHICLE TRIPS TO BE REMOVED										***(13,643)***	***(858)***	***(199)***	***(1,057)***	***(376)***	***(1,051)***	***(1,427)***
TOTAL NET EXTERNAL VEHICLE TRIPS										**3,944**	**547**	**164**	**711**	**131**	**371**	**502**

Notes:

This table is identical to Table 5 in Appendix G to the Final EIR for the LAC+USC Medical Center Campus Master Plan Project (ICF, November 2014).

[a] Source: *Trip Generation, 9th Edition* , Institute of Transportation Engineers (ITE), 2012.

[b] Internal capture represents the percentage of trips between the land uses that occur within the LAC+USC Medical Center. Due to the synergy between the land uses of the proposed Project, an internal trips credit has been applied to some of the proposed uses in order to provide conservative AM and PM peak hour project traffic volume forecasts, as well as daily project traffic volume forecast. A 15% internal capture trip reduction has been applied to all of the Project land use components.

[c] The transit credit is based on LADOT's Traffic Study Policies and Procedures, June 2013. The guidelines state that a 15% transit credit may be taken for projects within 1/4 mile of a transit station.

[d] The pass-by credit is based on Attachment I of LADOT's Traffic Study Policies and Procedures, June 2013.

[e] The ITE rates for the Specialty Retail Land Use 826 were used to estimate trip generation for the wellness-oriented community retail space. No information was provided for AM peak hour trip generation and so the AM peak hour trip rate was derived by applying the ratio between the Shopping Center Land Use 820 PM peak hour trip rate and the Specialty Retail Land Use 826 PM peak hour trip rate to the Shopping Center Land Use 820 AM peak hour trip rate. The AM directional distribution assumed is from the Shopping Center Land Use AM peak hour.

[f] The ITE rates for the Utilities Land Use 170 were used to estimate trip generation for the new utility plant, central power plant, and cooling towers. No information was provided for daily trip generation and so daily trips were estimated by doubling the summation of the AM and PM peak trips. The directional distribution for the trip generation per 1 KSF is unavailable for the AM peak hour, therefore the directional distribution for the trip generation per employee was assumed.

[g] ITE General Office trip generation equations used rather than the linear trip generation rate:

AM Peak Hour: Ln(T) = 0.80 * Ln(A) + 1.57, where T = trips, A = area in ksf

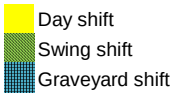
PM Peak Hour: T = 1.12 * A + 78.45, where T = trips, A = area in ksf

[h] The ITE rates for the Research & Development Center Land Use 760 were used to estimate trip generation for the medical offices, professional/administrative offices, and biotech research land uses proposed under Phase 2 and Phase 3. Additionally, the trip generation assumes that only 50% of the proposed medical offices, professional/administrative offices, and biotech research land uses would be built.

[i] Trip generated by existing LAC+USC Medical Center uses to be removed.

[j] The ITE rates for the General Heavy Industrial Land Use 120 were used to estimate trip generation for the carpenter's mill. Both the AM and PM peak hour directional distribution were unavailable and so General Light Industrial Land Use 110 directional distribution for the AM and PM peak hour were used respectively.

Table 2
Estimated Weekday Trip Generation of Residential Care Facilities at LAC+USC



Peak Hour	In	Out	Total
AM	*75*	*15*	*90*
PM	*0*	*75*	*75*

	In	Out	Total	Midnight	12:30	1:00	1:30	2:00	2:30	3:00	3:30	4:00	4:30	5:00	5:30	6:00	6:30	7:00	7:30	8:00	8:30	9:00	9:30	10:00	10:30	11:00	11:30	Noon	12:30	1:00	1:30	2:00	2:30	3:00	3:30	4:00	4:30	5:00	5:30	6:00	6:30	7:00	7:30	8:00	8:30	9:00	9:30	10:00	10:30	11:00	11:30
Crisis Resid. - Clinical	53	53	106															53																																
Crisis Resid. - Resid Care	6	6	12														6																																	
Crisis Residential	36	36	72																																															
Crisis Residential	15	15	30															15																																	
Recuperative Residential	22	22	44															22																																	
Recuperative Residential	11	11	22		11																																													
Recuperative Residential	11	11	22																11																																
Total Trips	**154**	**154**	**308**	0	11	0	0	0	0	0	0	0	0	0	0	0	6	0	90	0	11	0	0	0	0	0	0	0	0	0	0	0	36	0	17	0	0	75	0	0	0	0	0	0	0	0	15	36	11
Time Beginning				Midnight	12:30	1:00	1:30	2:00	2:30	3:00	3:30	4:00	4:30	5:00	5:30	6:00	6:30	7:00	7:30	8:00	8:30	9:00	9:30	10:00	10:30	11:00	11:30	Noon	12:30	1:00	1:30	2:00	2:30	3:00	3:30	4:00	4:30	5:00	5:30	6:00	6:30	7:00	7:30	8:00	8:30	9:00	9:30	10:00	10:30	11:00	11:30
																		Weekday Peak 7 - 10 AM																							Weekday Peak 3 - 6 PM															

Note: Average vehiicle ridership (AVR) for employees at the residential care facilities are assumed to be similar to the existing AVR of 1.37.

TABLE 3
PROJECT TRIP GENERATION ESTIMATES - LAC+USC MEDICAL CENTER CAMPUS MASTER PLAN (REVISED 2017)

Land Use	Size	Trip Generation Rates [a]									Estimated Trip Generation						
		ITE Code	Daily Rate	AM Peak Hour			PM Peak Hour				Daily	AM Peak Hour			PM Peak Hour		
				Rate	In	Out	Rate	In	Out			In	Out	Total	In	Out	Total
Hospital Addition	450 beds	610	12.94	1.32	72%	28%	1.42	33%	67%		5,823	428	166	594	211	428	639
Less: Internal Trips credit	*-15% [b]*	*Hospital*									*(873)*	*(64)*	*(25)*	*(89)*	*(32)*	*(64)*	*(96)*
Less: Transit credit	*-15% [c]*										*(743)*	*(55)*	*(21)*	*(76)*	*(27)*	*(54)*	*(81)*
Net External Vehicle Trips											4,207	309	120	429	152	310	462
Wellness-Oriented Comm. Meeting Space & Comm.-Serving Uses	85.000 ksf	495	33.82	2.05	66%	34%	2.74	49%	51%		2,875	115	59	174	114	119	233
Less: Internal Trips credit	*-15% [b]*	*Recreational Community*									*(431)*	*(17)*	*(9)*	*(26)*	*(17)*	*(18)*	*(35)*
Less: Transit credit	*-15% [c]*	*Center*									*(367)*	*(14)*	*(8)*	*(22)*	*(15)*	*(15)*	*(30)*
Driveway Trips											2,077	84	42	126	82	86	168
Less: Pass-By credit	*-20% [d]*										*(415)*	*(17)*	*(8)*	*(25)*	*(17)*	*(17)*	*(34)*
Net External Vehicle Trips											1,662	67	34	101	65	69	134
Wellness-Oriented Community Retail Space [e]	20.000 ksf	826	44.32	0.70	62%	38%	2.71	44%	56%		886	9	5	14	24	30	54
Less: Internal Trips credit	*-15% [b]*	*Specialty Retail*									*(133)*	*(1)*	*(1)*	*(2)*	*(4)*	*(4)*	*(8)*
Less: Transit credit	*-15% [c]*										*(113)*	*(1)*	*(1)*	*(2)*	*(3)*	*(4)*	*(7)*
Driveway Trips											640	7	3	10	17	22	39
Less: Pass-By credit	*-10% [d]*										*(64)*	*(1)*	*0*	*(1)*	*(2)*	*(2)*	*(4)*
Net External Vehicle Trips											576	6	3	9	15	20	35
New Utility Plant and Facilities [f]	40.000 ksf	170	[f]	0.80	90%	10%	0.76	45%	55%		124	29	3	32	14	16	30
Less: Internal Trips credit	*-15% [b]*	*Utilities*									*(19)*	*(5)*	*0*	*(5)*	*(2)*	*(3)*	*(5)*
Less: Transit credit	*-15% [c]*										*(16)*	*(4)*	*0*	*(4)*	*(2)*	*(2)*	*(4)*
Net External Vehicle Trips											89	20	3	23	10	11	21
Outpatient Clinics	200.000 ksf	720	36.13	2.39	79%	21%	3.57	28%	72%		7,226	378	100	478	200	514	714
Less: Internal Trips credit	*-15% [b]*	*Medical Office Building*									*(1,084)*	*(57)*	*(15)*	*(72)*	*(30)*	*(77)*	*(107)*
Less: Transit credit	*-15% [c]*										*(921)*	*(48)*	*(13)*	*(61)*	*(25)*	*(66)*	*(91)*
Net External Vehicle Trips											5,221	273	72	345	145	371	516
Professional/Administrative Offices	265.000 ksf	710	11.03	[g]	88%	12%	[g]	17%	83%		2,923	367	50	417	64	311	375
Less: Internal Trips credit	*-15% [b]*	*General Office Building*									*(438)*	*(55)*	*(8)*	*(63)*	*(10)*	*(46)*	*(56)*
Less: Transit credit	*-15% [c]*										*(373)*	*(47)*	*(6)*	*(53)*	*(8)*	*(40)*	*(48)*
Net External Vehicle Trips											2,112	265	36	301	46	225	271
Biotech Research and Development [h]	508.000 ksf	760	8.11	1.22	83%	17%	1.07	15%	85%		4,120	515	105	620	82	462	544
Less: Internal Trips credit	*-15% [b]*	*Research & Development*									*(618)*	*(77)*	*(16)*	*(93)*	*(12)*	*(70)*	*(82)*
Less: Transit credit	*-15% [c]*										*(525)*	*(66)*	*(13)*	*(79)*	*(11)*	*(59)*	*(69)*
Net External Vehicle Trips											2,977	372	76	448	59	333	393
LAC+USC Children's Center [k]	12 children	565	4.38	0.80	53%	47%	0.81	47%	53%		*53*	*5*	*5*	*10*	*9*	*1*	*10*
Less: Internal Trips credit	*-50% [b]*	*Child Care Center*									*(27)*	*(3)*	*(2)*	*(5)*	*(2)*	*(3)*	*(5)*
Net External Vehicle Trips											26	2	3	5	7	(2)	5
Crisis Residential Care Facility (64 beds) and Recuperative Care Facility (96 beds)	160 beds	see Table 2									308	75	15	90	0	75	75
DRIVEWAY TRIPS											17,657	1,407	370	1,777	518	1,431	1,950
EXTERNAL VEHICLE TRIPS											**17,178**	**1,389**	**362**	**1,751**	**499**	**1,412**	**1,912**
EXISTING TRIPS TO BE REMOVED [i]																	
General Office Space	197.288 ksf	710	11.03	[g]	88%	12%	[g]	17%	83%		*(2,176)*	*(290)*	*(40)*	*(330)*	*(51)*	*(248)*	*(299)*
Laboratory and Clinic Buildings	457.727 ksf	720	36.13	2.39	79%	21%	3.57	28%	72%		*(16,538)*	*(864)*	*(230)*	*(1,094)*	*(458)*	*(1,176)*	*(1,634)*
Carpenter's Mill [j]	31.000 ksf	120	1.50	0.51	88%	12%	0.68	12%	88%		*(47)*	*(14)*	*(2)*	*(16)*	*(3)*	*(18)*	*(21)*
Central Power Plant and Cooling Towers	20.938 ksf	170	[f]	0.80	90%	10%	0.76	45%	55%		*(66)*	*(15)*	*(2)*	*(17)*	*(7)*	*(9)*	*(16)*
Warehouse and Storage Trailers	15.756 ksf	150	3.56	0.30	79%	21%	0.32	25%	75%		*(56)*	*(4)*	*(1)*	*(5)*	*(1)*	*(4)*	*(5)*
Existing Trips To Be Removed											*(18,883)*	*(1,187)*	*(275)*	*(1,462)*	*(520)*	*(1,455)*	*(1,975)*
Less: Internal Trips credit	*-15% [b]*										*2,832*	*178*	*41*	*219*	*78*	*218*	*296*
Less: Transit credit	*-15% [c]*										*2,408*	*151*	*35*	*186*	*66*	*186*	*252*
TOTAL EXISTING VEHICLE TRIPS TO BE REMOVED											***(13,643)***	***(858)***	***(199)***	***(1,057)***	***(376)***	***(1,051)***	***(1,427)***
TOTAL NET EXTERNAL VEHICLE TRIPS											**3,535**	**531**	**163**	**694**	**123**	**361**	**485**

Notes:

[a] Source: *Trip Generation, 9th Edition* , Institute of Transportation Engineers (ITE), 2012.

[b] Internal capture represents the percentage of trips between the land uses that occur within the LAC+USC Medical Center. Due to the synergy between the land uses of the proposed Project, an internal trips credit has been applied to some of the proposed uses in order to provide conservative AM and PM peak hour project traffic volume forecasts, as well as daily project traffic volume forecast. A 15% internal capture trip reduction has been applied to all of the Project land use components.

[c] The transit credit is based on LADOT's Traffic Study Policies and Procedures, June 2013. The guidelines state that a 15% transit credit may be taken for projects within 1/4 mile of a transit station.

[d] The pass-by credit is based on Attachment I of LADOT's Traffic Study Policies and Procedures, June 2013.

[e] The ITE rates for the Specialty Retail Land Use 826 were used to estimate trip generation for the wellness-oriented community retail space. No information was provided for AM peak hour trip generation and so the AM peak hour trip rate was derived by applying the ratio between the Shopping Center Land Use 820 PM peak hour trip rate and the Specialty Retail Land Use 826 PM peak hour trip rate to the Shopping Center Land Use 820 AM peak hour trip rate. The AM directional distribution assumed is from the Shopping Center Land Use AM peak hour.

[f] The ITE rates for the Utilities Land Use 170 were used to estimate trip generation for the new utility plant, central power plant, and cooling towers. No information was provided for daily trip generation and so daily trips were estimated by doubling the summation of the AM and PM peak trips. The directional distribution for the trip generation per 1 KSF is unavailable for the AM peak hour, therefore the directional distribution for the trip generation per employee was assumed.

[g] ITE General Office trip generation equations used rather than the linear trip generation rate:
AM Peak Hour: Ln(T) = 0.80 * Ln(A) + 1.57, where T = trips, A = area in ksf
PM Peak Hour: T = 1.12 * A + 78.45, where T = trips, A = area in ksf

[h] The ITE rates for the Research & Development Center Land Use 760 were used to estimate trip generation for the medical offices, professional/administrative offices, and biotech research land uses proposed under latter phases of the Master Plan.

[i] Trip generated by existing LAC+USC Medical Center uses to be removed.

[j] The ITE rates for the General Heavy Industrial Land Use 120 were used to estimate trip generation for the carpenter's mill. Both the AM and PM peak hour directional distribution were unavailable and so General Light Industrial Land Use 110 directional distribution for the AM and PM peak hour were used respectively.

[k] Existing LAC+USC Children's Center licensed for 72 children. Future facility will be licensed for 84 children, an increase of 12 children. Assume that 50% are from the community and 50% are children of employees on-site.