FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

SCH# 2014051061

LAC+USC MEDICAL CENTER CAMPUS MASTER PLAN

PREPARED FOR:

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

PREPARED BY:

ICF INTERNATIONAL

NOVEMBER 2014

Contents

1. Introduction

This Findings of Fact (Findings) and the Statement of Overriding Considerations summarize the findings of environmental impacts of the *LAC+USC Medical Center Campus Master Plan Project Environmental Impact Report* (EIR) - (SCH No. 2014051061) and presents the Statement of Overriding Considerations. This section presents an overview of the purpose of this document, summarizes the proposed project and presents the organization of this document.

1.1 Purpose of Findings and the Statement of Overriding Considerations

Section 15091 of the California Environmental Quality Act (CEQA) Guidelines (and Section 21081 of the California Public Resources Code) require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more written findings for each such impact. According to Section 21081, "no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

(a) The public agency makes one or more of the following possible findings with respect to each significant effect:

1. Changes or alterations have been required in, or incorporated into, the project to mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(b) With respect to significant effects which were subject to a finding under paragraph(3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment."

Section 21081.6 of CEQA also requires public agencies to adopt a monitoring and reporting program for assessing and ensuring the implementation of proposed mitigation measures. The mitigation measures identified in the Mitigation Monitoring and Reporting Plan (MMRP) for the proposed project, which is provided under separate cover, are those identified within this Findings and the Statement of Overriding Considerations.

The Statement of Overriding Considerations is a written statement explaining the specific reasons why the social, economic, legal, technical or other beneficial aspects of the proposed project outweigh the unavoidable adverse environmental impacts and why the Lead Agency is willing to accept such impacts. This statement shall be based on the final EIR and/or other substantial evidence in the record.

1.2 Overview of the Proposed Project

The proposed LAC+USC Medical Center Campus Master Plan would guide future development of the campus and influence the delivery of health care services and health-related community programs over a period of approximately 25 years.

The objectives of the master plan are to:

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

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

The main elements of the proposed master plan are listed below:

1.3 Inpatient Facilities

1.4 Outpatient Facilities

- Medical Center Offices
- Central Utility Expansion
- Pedestrian Circulation and Access
- Biotech Research and On-campus Housing
- Parking Facilities
- Community Open Space and Landscape Conceptual Elements

1.5 Document Organization

This Findings and the Statement of Overriding Considerations are organized in the following way:

- Section 1.0, Introduction, provides background information of the purpose of Findings and the Statement of Overriding Considerations and presents the organization of this document and provides a brief overview of the proposed project.

- Section 2.0, Statement of Environmental Effects and Required Findings, identifies the issue areas for which the proposed project would have no impact or a less than significant impact, and presents a summary of the significant effects of the proposed project along with the one or more written findings made by the public agency explaining how it dealt with each of the significant effects and mitigation measures.
- Section 3.0, Alternatives Considered, describes the alternatives evaluated in the EIR, and the findings and rationale for selection of the proposed project.
- Section 4.0, Statement of Overriding Considerations, explains in detail why the social, economic, legal, technical or other beneficial aspects of the proposed project outweighs the unavoidable, adverse environmental impacts and why the agency is willing to accept such impacts.

2. Statement of Environmental Effects and Required Findings

This section discusses the impacts and mitigation measures identified for the proposed project, and makes findings for all areas of potential impact.

The EIR focused on those potential effects of the proposed project on the environment that the Lead Agency has determined may be significant. Chapter 6 of the EIR determined that the proposed Project would have either no impact or less than significant impacts regarding the following issue areas:

No Impacts

- Aesthetics
  - Scenic Vista (construction and operation)
  - Light and Glare (construction)
- Biological Resources
  - Local Policies (operation)
- Cultural Resources
  - Historical Resources (operation)
  - Archaeological Resources (operation)
  - Paleontological Resources (operation)
- Hydrology
  - Seiche, Tsunami (construction and operation)
- Land Use
  - Physical Division of an Established Community (operation)
- Population and Housing
  - Displacement of Housing and People (construction and operation)

Additionally, Los Angeles County, as the CEQA lead agency, determined in the NOP/IS (see Appendix A) that the proposed project would not result in impacts in the following areas and no further environmental review of those resource areas was conducted as part of this EIR.

- Agricultural and Forestry Resources
- Mineral Resources

Less than Significant Impacts

- Aesthetics
  - Scenic Resources (operation)
  - Visual Character (construction and operation)
  - Light and Glare (operation)
- Air Quality
  - Obstruct Implementation of the Applicable Air Quality Plan
  - Violate Air Quality Standard (operation)
  - Expose Sensitive Receptors to Substantial Pollutant Concentrations (operation)
  - Objectionable Odors (construction and operation)
- Biological Resources
  - Habitat Modification (construction and operation)
  - Species (construction and operation)
  - Wetlands (construction and operation)
- Hazards and Hazardous Material
  - Routine Transport (operation)
  - Upset and Accident conditions (construction and operation)
  - Hazards to Schools (operation)
  - Hazardous Materials Sites (operation)
  - Emergency response (operation)
- Hydrology
  - Water Quality Standards (construction and operation)
  - Groundwater Supplies (construction and operation)
  - Drainage and Flooding (construction and operation)
  - Stormwater Runoff (construction and operation)
- Land Use
  - Physical Division of an Established Community (construction)
  - Conflicts with Applicable Plans and Policies (construction and operation)
- Population and Housing
  - Population Growth (construction and operation)

- Public Services
  - Police and Fire services (operation)
  - Schools (construction and operation)
  - Parks (construction and operation)
- Recreation
  - Increased Use of Existing parks (construction and operation)
  - Require Construction of Recreational Facilities (construction and operation)
- Transportation/Traffic
  - Conflict with Congestion Management Agency (operation)
  - Increase Hazards due to Design Feature (operation)
  - Inadequate Emergency Access (operation)
  - Conflict with Adopted Plans Regarding Public Transit, Pedestrian Facilities (operation)
  - Inadequate Parking (construction and operation)
- Utilities
  - Exceed Wastewater Treatment Requirements (construction and operation)
  - Require Expansion of Existing Facilities (construction and operation)
  - Construction of New Stormwater Drainage Facilities (construction and operation)
  - Water Supplies (construction)
  - Adequate Capacity for Wastewater Treatment Provider (operation)
  - Landfill Capacity (construction and operation)
  - Compliance with Solid Waste Regulations (construction and operation)

As described in Section 15128 of the CEQA Guidelines, and detailed in the EIR, these issues have no potential for significant impacts and required no further environmental review or analysis beyond the discussion in the EIR.

Potentially Significant Impacts Requiring Mitigation

The following impacts were identified as potentially significant but would be reduced to less than significant with incorporation of proposed mitigation measures.

- Air Quality
  - Violate Air Quality Standard (construction)
  - Increase in a Criteria Pollutant
  - Biological Resources-
  - Migratory Wildlife and/Corridors (construction and operation)
  - Local Policies (operation)
- Cultural Resources
  - Archaeological Resources (construction)
  - Paleontological Resources (construction)
- Geology and Soils
- Hazards and Hazardous Materials

- Routine Transport (construction)
- Hazardous Materials Sites (construction)
- Emergency Response (construction)
- Schools (construction)

- Noise
  - Traffic Noise and Other Operational Sources
- Public Services
  - Police and fire services (construction)
- Transportation/Traffic
  - Increase Hazards due to Design Features (construction)
  - Inadequate Emergency Access (construction)
  - Conflict with Adopted Plans Regarding Public Transit, Pedestrian Facilities (construction)
- Utilities
  - Adequate Capacity for Wastewater Treatment Provider (construction)

Significant Unavoidable Impacts

Significant unavoidable impacts would occur as a result of the proposed LAC+USC Medical Center Campus Master Plan in the following resource areas:

- **Air Quality (only during construction)**

  The primary source of PM10 and PM2.5 emissions is fugitive dust from on-site clearing and demolition. As shown in Table 3.2-9, implementation of Mitigation Measures AQ -1 and AQ-2 would reduce emissions, but PM10 and PM2.5 levels would remain in excess of SCAQMD thresholds. Compliance with Rule 403 would reduce PM emissions, but not to a level below thresholds. Therefore, this impact would be considered significant and unavoidable.

- **Aesthetics (only during construction)**

  Demolition of the Women's and Children's Hospital building, which is aesthetically noteworthy because of its architectural design and is a historical resource, would be a significant unavoidable adverse visual impact of the proposed project.

- **Cultural Resources (only during construction)**

  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, would be an unavoidable significant adverse historical resources impact.

- **Greenhouse Gas Emissions (during construction and operation)**

  Because project emissions would exceed the 3,000 MT CO_2e annual threshold, project generated GHG emissions would be a significant and unavoidable cumulative impact.

- **Noise and Vibration (only during construction)**

While MM-NOI-1 would reduce construction noise levels, it would not eliminate the predicted noise impacts entirely; therefore, construction noise impacts are considered significant and unavoidable. Construction vibration impacts would be considered significant unavoidable after implementation of mitigation measure MM-NOI-6.

- **Recreation (only during construction)**

  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.

- **Transportation/Traffic (only during operation)**

  The proposed development under the master plan would generate additional vehicle trips that would result in significant traffic impacts at four study intersections (intersections 1, 9, 13, and 19) under the existing baseline plus-project scenario and four study intersections (intersections 9, 13, 19, and 20) under the cumulative year (2040) plus-project scenario. No feasible mitigation measures have been identified for intersections 1, 9, 19, and 20. As a consequence, the impacts to those intersections would be significant and unavoidable. The proposed mitigation measures at study intersection 13 would reduce the impact to less than significant. However, given the intersection is located within the City of Los Angeles and the mitigation is subject to approval by the City of Los Angeles Department of Transportation (LADOT), if LADOT does not approve the proposed mitigation, the impact at this intersection would be significant and unavoidable.

- **Utilities (only during operation)**

  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 potentially 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.

3. Required Findings

Each of the resource areas analyzed in the EIR is discussed in terms of:

- *Description of Potential Effects* are specific descriptions of the environmental effects identified in the EIR as significant or potentially significant.
- *Mitigation Measures* are the proposed mitigation measures for the impacts identified as significant or potentially significant.
- *Findings* are the findings made in accordance with Section 21081 of CEQA. One of the three possible findings is made for each significant or potentially significant impact, in response to

Section 15091 of the CEQA Guidelines. The significance of the environmental impacts after mitigation is also provided.

- *Rationale* is a summary of the reasons for the findings.
- *References* are notations on the specific section in the EIR or other information source that support the findings.

3.1 Aesthetics

3.1.1 Description of Potential Effects

The master plan does not propose new development near a scenic highway or within natural open space. No rock outcroppings were identified in the project area. Scenic resources on the campus include architectural/aesthetic resources such as Old County General Hospital and Administration Building, as well as the Women's and Children's Hospital, and mature landscaping and hardscape features that were installed as part of the circa 1933 Allied Architects architectural and landscape plans for the property. However, the Women's and Children's Hospital, which is historic resource and aesthetically noteworthy because of its architectural design, would be demolished to accommodate future master plan development. This visual impact would be significant and unavoidable.

The temporary presence of construction-related vehicles, equipment, barricading and cranes, etc., and construction-related excavation and grading, would not result in significant changes to visual character, nor would these result in a significant overall reduction in visual quality; thus, a less-than-significant impact on visual character and quality would result from project construction. 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. This would be considered a less than significant impact.

All shade-sensitive residential viewers are sufficient distances away from areas on the eastern and southern portions of the campus proposed for development that they are expected to be beyond the shadow impact zone.

3.1.2 Mitigation Measures

MM-CR-3 in Section 3.4.4.2 would partially mitigate the visual impact due to demolition of the Women's and Children's Hospital as described below:

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.

3.1.3 Findings

For the above impacts to aesthetics, the following finding is made:

☐ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential impacts to aesthetics from the operation of the proposed project are found to be

☒ Significant ☐ Not Significant

3.1.4 Rationale

No feasible mitigation measures were identified that would reduce the impact of demolition of the Women's and Children's hospital to a less-than-significant level. A Seismic Performance Evaluation was conducted in 2006 to identify structural upgrades that would be needed to use the building for office or laboratory space. The 2006 study determined that it would cost approximately $18 million to $31.8 million (construction hard costs only) to repair the building in accordance with the structural recommendations in the study. Because of the potential cost of repairs and the fact that retaining the structure would preclude proposed access and circulation improvements that would link the northwest campus to the main part of the campus and would leave less space for new parking, central utility plant, and community open space, an alternative that would re-use the Women's and Children's hospital was rejected as infeasible.

3.1.5 References

Section 3.1 of the EIR addresses the project's aesthetic impacts. Chapter 5 of the EIR discusses a Full Adaptive Re-Use Alternative that was rejected as infeasible.

3.2 Air Quality

3.2.1 Description of Potential Effects

The proposed project would be consistent with the City of Los Angeles' General Plan and regional planning documents and thus consistent with the region's air quality plan. During construction, estimated daily criteria pollutant emissions could exceed South Coast Air Quality Management District (SCAQMD) regional construction-period thresholds for volatile organic compounds (VOCs) and nitrogen oxides (NOx). However, mitigation to reduce construction-related emissions would eliminate this regional impact.

Construction emissions could exceed thresholds for precursors to a nonattainment pollutant; however, mitigation to reduce construction-related emissions would eliminate this impact.

Construction activities could expose nearby sensitive land uses to substantial pollutant concentrations. NOx, PM10, and PM2.5 emissions could exceed localized significance thresholds. Mitigation to reduce fugitive dust and exhaust emissions would reduce but not eliminate this impact.

No significant impacts would occur during operations because emissions would be below significance thresholds.

3.2.2 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 NO_X 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 NO_X 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.

3.2.3 Findings

For the above impacts to air quality, the following findings are made:

☒ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential air quality impacts due to the proposed project are found to be.

☒ Significant ☐ Not Significant

3.2.4 Rationale

Proposed mitigation measures would reduce construction emissions below SCAQMD regional construction-period thresholds. However, impacts to nearby sensitive land uses due to exposure to substantial pollutant emissions during construction could still exceed thresholds after implementation of proposed mitigation measures. No additional feasible mitigation measures have been identified that would reduce these potential localized construction emissions impacts to a less-than-significant level. Alternatives B and in particular Alternative C (see Chapter 5 of the EIR) could result in reduced air quality impacts compared to the proposed project. Alternative B, however, would not meet all of the project objectives or provide all of the benefits that could occur under the proposed master plan.

3.2.5 References

Section 3.2 of the EIR addresses the project's air quality impacts. Chapter 5 of the EIR describes the impacts of the alternatives to the proposed project.

3.3 Biological Resources

3.3.1 Description of Potential Effects

The proposed project could require the removal of palm trees or other potential roost sites for Western yellow bats, a potentially significant impact.

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. The destruction of an occupied nest would be a significant impact and a violation of the MBTA and the California Fish and Game Code. Therefore, this impact could be significant.

3.3.2 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 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.

3.3.3 Findings

For the above impacts to biological resources, the following finding is made:

☒ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☐ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential impacts to biological resources due to the proposed project are found to be.

☐ Significant ☒ Not Significant

3.3.4 Rationale

Impacts associated with project construction would be mitigated with implementation of the above listed mitigation measures.

3.3.5 References

Section 3.3 of the EIR addresses the project's biological resources impacts.

3.4 Cultural Resources

3.4.1 Description of Potential Effects

Historic Resources

General construction activities would include demolition of several structures, including the Women's and Children's Hospital, old Utility and Maintenance Facility, Outpatient Department Building, Interns and Residents Building, Parking Structure 12, several modular buildings, and storage and warehouse buildings.

Significant impacts on historical resources would occur when the resources are demolished or when the characteristics that convey the resources' historical significance are materially altered. Potential impacts on individual historical resources resulting from development under the master plan could include, but may not be limited to, the following:

Demolition of Women's and Children's Hospital: As part of the proposed master plan, one building that has been determined eligible for listing in the CRHR would be demolished: the Women's and Children's Hospital, determined eligible for the CRHR under Criteria 1 and 3. Demolition of a historical resource would be considered a significant impact.

Alterations to General Hospital Retaining Walls: Changes in pedestrian access and development of "the hill" may require retaining walls to be removed or altered. The retaining walls that support the west side of the hill below the historic General Hospital are considered character-defining features of the General Hospital setting. Demolition of, damage to, and/or alteration of these features has the potential to cause an adverse change in the setting of General Hospital, which is NRHP eligible.

Alterations to Setting of State Street: Any alterations to the overall setting of State Street, which is considered a character-defining feature of the General Hospital/Acute Unit setting, may have an adverse impact on the setting of General Hospital, which is NRHP eligible.

Impacts on Viaduct/Pedestrian Tunnel: Construction of the proposed Market Plaza, Community Garden, and Pedestrian Mall have the potential to affect the existing viaduct/pedestrian tunnel that connects the Service Building to the basement of General Hospital indirectly. Although direct impacts are not anticipated as a result of construction of the Market Plaza, Community Garden, or Pedestrian Mall, indirect impacts related to excavation and/or grading, along with temporary increases in vibration as a result of these actions, could occur. The viaduct/tunnel is one of the oldest elements of the hospital grounds, and although it has been expanded and altered over the years, the portion that was constructed in 1933 is considered a contributing element of the General Hospital setting. Any actions that would damage, alter, or demolish this structure may cause a substantial adverse change in the significance of the setting of the General Hospital/Acute Unit setting.

Impacts on Old Administration Building and Service Building: The proposed Artist Meadow would be located between two historical resources: the old Administration Building and the

Service Building; both buildings have been determined eligible for listing in the NRHP. Although direct impacts are not anticipated as a result of construction of the meadow, indirect impacts related to excavation and/or grading, along with temporary increases in vibration as a result of these actions, could occur.

Construction impacts on identified historical resources due to individual projects proposed under the master plan could be significant but would vary, depending on final plans, and would need to be analyzed in detail to confirm the level of impact and what type of mitigation, if any, would be required (see the proposed mitigation measures below). However, the proposed demolition of the Women's and Children's Hospital would be a significant and unavoidable impact of the master plan.

Archaeological Resources

Disturbance or destruction of archaeological resources resulting in a substantial adverse change in the significance of the resource would be a significant impact. 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. Mitigation measure MM-CR-8 would be carried out to mitigate potential impacts on archaeological resources.

Operation of the LAC+USC Medical Center campus under the proposed master plan would not affect archaeological resources.

Paleontological Resources

No fossils are known within the project site. However, late Pleistocene (50,000 to 11,000 years old) localities that produced mammoth, mastodon, giant ground sloth, and saber-toothed cat are known from nearby locations. In addition, Miocene (22 to 5 million years old) localities that produced extinct herring and other fishes are also known nearby. Consequently, structure demolition and grading and excavation for new foundations and access routes, as well as excavation for parking structures, have the potential to destroy paleontological resources, a potentially significant impact. Mitigation measure MM-CR-9, below, explains how potential impacts on paleontological resources would be mitigated.

Operation of the LAC+USC Medical Center campus under the proposed master plan would not affect paleontological resources.

3.4.2 Mitigation Measures

Historic Resources

The measures listed below are proposed to mitigate the potential construction impacts on historical resources described above. These measures would be implemented, as appropriate, as individual development projects are proposed and approved under the master plan. Please note that since this is a program EIR, the mitigation measures are by necessity broad in scope. Any subsequent environmental documents for individual projects under the proposed master plan may require additional specific 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.

Archaeological Resources

The following measure is proposed to mitigate impacts to archaeological resources:

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

Paleontological Resources

The following measure is proposed to mitigate impacts to paleontological resources:

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.

Human Remains

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.

3.4.3 Findings

For the above impacts to cultural resources, the following findings are made:

☒ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential impacts to cultural resources from the proposed project are found to be.

☒ Significant ☐ Not Significant

3.4.4 Rationale

Impacts associated with archaeological and paleontological resources would be mitigated with implementation of the above listed mitigation measures; however, the mitigation measures identified to reduce impacts to historic resources due to demolition of the Women's and Children's Hospital would not reduce the impact to a less-than-significant level. This would be considered a significant unavoidable impact. A Seismic Performance Evaluation was conducted in 2006 to identify structural upgrades that would be needed to use the building for office or laboratory space. The 2006 study determined that it would cost approximately $18 million to $31.8 million (construction hard costs only) to repair the building in accordance with the structural recommendations in the study. Because of the potential cost of repairs and the fact that retaining the structure would preclude proposed access and circulation improvements that would link the northwest campus to the main part of the campus and would leave less space for new parking, central utility plant, and community open space, an alternative that would re-use the Women's and Children's hospital was rejected as infeasible. Alternatives B and C and the proposed project would result in similar impacts to historic resources and could result in demolition of the Women's and Children's hospital.

3.4.5 References

Section 3.4 of the EIR addresses the project's cultural resources impacts. Chapter 5 of the EIR discusses alternatives to the proposed project including those alternatives that were considered but rejected as infeasible.

3.5 Geology and Soils

3.5.1 Description of Potential Effects

The proposed project would require demolition of some existing buildings on the campus and various site grading and construction activities. The geologic and seismic hazards including liquefaction hazards in the western portion of the project site, potential soil instability due to onsite groundwater, and the possible presence of expansive soils would be reduced by employing required standard engineering practices and compliance with California Building Code standards, in the design and construction of the proposed project. Proposed structures, including the optional tunnel, would be designed to meet all applicable design and building engineering practices. Nonetheless, due to the location of the project site within a seismically active region and potential onsite seismic and soil hazards, potential impacts prior to the mitigation would be significant.

3.5.2 Mitigation Measures

MM-GEO-1: All recommendations included in the preliminary geotechnical evaluation prepared for the proposed project (see Appendix D) 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.

- *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.

- *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.

3.5.3 Findings

For the above impacts to geology and soils, the following finding is made:

☒ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☐ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential geology and soils impacts due to the proposed project are found to be.

☐ Significant ☒ Not Significant

3.5.4 Rationale

The project site is located in a seismically active region, and risks posed by earthquakes generally apply to any structure located in southern California, in the event that a major seismic event or identification of onsite geologic or soil hazards, standard building practices and implementation of Mitigation Measures GEO-1 and GEO-2 would ensure that the proposed project is designed and constructed in accordance with appropriate seismic protections prescribed for the site's specific geotechnical characteristics.

3.5.5 References

Section 3.5 of the EIR addresses the project's geologic/soils impacts.

3.6 Greenhouse Gas Emissions

3.6.1 Description of Potential Effects

The projected level of development that could occur under the master plan could result in an estimated 37,281 metric tons (MT) of annual GHG emissions, which would exceed the 3,000 MT

CO_2e threshold. Implementation of the project-related design features described in Chapter 2 of the EIR, as well as statewide measures associated with implementing AB 32, would reduce GHG emissions. However, construction- and operations-related GHG emissions would be considered a significant and unavoidable cumulative impact.

By adopting all feasible project design and mitigation measures to reduce GHG emissions, the proposed project would be consistent with and not frustrate any AB 32 Scoping Plan measures, nor be inconsistent in any way with the AB 32 goal of reducing state-wide GHG emissions to 1990 levels by year 2020.

3.6.2 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.

3.6.3 Findings

For the above greenhouse gas emissions impacts, the following finding is made:

☐ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential greenhouse gas impacts due to the proposed project are found to be.

☒ Significant ☐ Not Significant

3.6.4 Rationale

Impacts associated with greenhouse gas emissions would be reduced with implementation of the above listed mitigation measures but not to a less-than-significant level. Because no feasible mitigation measures were identified beyond those identified above that would fully mitigate this impact, significant unavoidable cumulative greenhouse gas emissions impacts would occur as a result of the proposed project. Alternative B – Reduced Development Alternative would result in reduced greenhouse gas emissions impacts; however, this alternative would not meet all of the proposed project objectives and would not provide all of the benefits that would occur under the proposed project.

3.6.5 References

Section 3.6 of the EIR addresses the project's greenhouse gas emissions impacts. Chapter 5 discusses alternatives to the proposed project including Alternative B.

3.7 Hazards and Hazardous Materials

3.7.1 Description of Potential Effects

During the construction period, routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and caulking would occur, which would not pose a significant hazard. Asbestos-containing materials (ACM), lead-based paints (LBP), soils contaminated with hydrocarbons, and underground storage tanks may be encountered during construction, which could be accidentally released into the environment, a potentially significant impact.

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. Operation of future campus facilities would allow for adequate access within and around the project site.

Operation would involve the use and occasional transport of non-acutely hazardous chemicals for maintenance and cleaning, as well as the disposal of biomedical wastes. Operation of future

facilities and buildings on the campus would entail the use of solvents, cleaning agents, paints, pesticides, diesel, petroleum fuels, batteries, and the disposal of biomedical wastes.

The boundary of the campus is within 0.25 mile of Bravo Medical Magnet High School. The LAC+USC Children's Center is located on the western edge of the medical center campus. Demolition activities involving ACM and LBP or excavation activities in the vicinity of potential environmental conditions (PECs) may result in the release of hazardous materials, but such releases, if they occur, would be generally limited to the project site. Several underground storage tanks, an active oil well, petroleum tanks, and pumps are all PECs within the vicinity of the site and could potentially be disturbed by construction activities, a potentially significant impact. Operation of future campus facilities would not pose a risk of disturbing PECs.

3.7.2 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.

Also, see mitigation measures MM-PS-1 in Section 3.12, Public Services, and MM-TRAF-1 in Section 3.14, Transportation/Traffic of the EIR for measures to reduce impacts on emergency vehicle access and response times during the construction period.

3.7.3 Findings

For the above impacts to hazards and hazardous materials, the following finding is made:

☒ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☐ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential hazards and hazardous materials impacts due to the proposed project are found to be.

☐ Significant ☒ Not Significant

3.7.4 Rationale

While construction on the project site has potential to encounter hazardous materials in excavated soils, groundwater, or in the materials of the demolished buildings, Mitigation Measures HM-1 through HM-3 would ensure that, if encountered, these hazardous materials are handled appropriately to minimize the risk of exposure to construction workers and the general population. Mitigation measures PS-1 and TRAF-1 would mitigate impacts during construction on emergency vehicle access and response times.

3.7.5 References

Section 3.7 of the EIR addresses the project's hazardous waste and materials impacts.

3.8 Noise

3.8.1 Description of Potential Effects

Maximum construction noise levels would exceed the thresholds established for the project at on-site medical center buildings that house patients and at off-site residential properties. Construction vibration levels could exceed the threshold established for the project at both on-site medical center buildings that house patients and at off-site residential properties.

Proposed on-site non-residential buildings would be exposed to potentially significant exterior noise levels that would require exterior-to-interior noise mitigation per the California Green Building Standards Code (CALGreen) and County of Los Angeles Building Code.

Mechanical equipment at the project site (HVAC, ventilation fans, central plant, etc.) has the potential to exceed the applicable City of Los Angeles noise standards at off-site sensitive receptors. Large organized outdoor events at the project site have the potential to exceed the applicable City of Los Angeles noise standards at off-site sensitive receptors.

Activities associated with operation of proposed master plan facilities are not expected to expose sensitive receptors to excessive groundborne vibration or noise.

Aircraft operations associated with the two on-site helipads are not expected to change significantly as a result of the project and aircraft noise impacts would be less-than-significant.

3.8.2 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. Careless or improper operation or inappropriate use of equipment can increase noise and vibration levels. Poor loading, unloading, excavation, and hauling techniques are examples of how a lack of adequate guidance and training may lead to increased noise and vibration levels.
- 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 provided 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 provided 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 provided 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.

3.8.3 Findings

For the above impacts to noise, the following findings are made:

☒ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential impacts to noise from the proposed project are found to be.

☒ Significant ☐ Not Significant

3.8.4 Rationale

Operational noise impacts would be reduced to less than significant with implementation of the mitigation measures above. Construction noise and vibration impacts would be reduced but not to a less-than-significant level. Because no additional feasible mitigation measures were identified beyond those above, significant unavoidable construction noise and vibration impacts could occur as a result of the proposed project.

Alternative B would result in fewer and less intense impacts during construction and operation than the proposed project because of the reduced level of development. However, this alternative would not meet all of the project objectives or provide all of the benefits of the proposed project. Alternative C would result in less intensive construction noise and vibration impacts than the proposed project due to the fact that construction would be limited to one zone of the campus at a time.

3.8.5 References

Section 3.10 of the EIR addresses the project's noise impacts. Chapter 5 describes the impacts of the alternatives to the proposed project.

3.9 Public Services

3.9.1 Description of Potential Effects

Emergency access to the project site could be affected by construction. Temporary lane closures and construction related-traffic could delay or obstruct the movement of emergency vehicles, therefore resulting in a potentially significant impact. In order to ensure emergency access, traffic flow, and the LAFD's ability to maintain an adequate response time between four and six minutes, the County would implement mitigation measure MM-PS-1. Additionally, MM-PS-1 is required in order to ensure emergency access, traffic flow, and the LASD and LAPD's ability to maintain adequate response times and other performance objectives.

As part of the standard project approval process, LAFD would review and approve all project plans to ensure compliance with applicable fire codes and standards, thereby minimizing the risk of increased operational fire hazards. Additionally, under the proposed master plan, older vacant or underutilized buildings that pose an increased risk of fire hazard would be demolished. As a consequence, the proposed project 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 to fire services as a result of the proposed project would be less than significant.

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. 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.

3.9.2 Mitigation Measures

The following measure is proposed to mitigate the construction impacts described in Impact PS-1.

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 proposed development projects before construction begins.

3.9.3 Findings

For the above impacts to public services, the following finding is made:

☐ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential impacts to public services from the operation of the proposed project are found to be.

☐ Significant ☒ Not Significant

3.9.4 Rationale

In order to maintain emergency access during construction activities, LAFD, LASD, and LAPD would need to maintain adequate response times and other performance objectives. As described in Chapter 3.12, MM-PS-1would reduce impacts associated with emergency services to less than significant levels.

3.9.5 References

Section 3.12 of the EIR addresses the project's public services impacts.

3.10 Recreation

3.10.1 Description of Potential Effects

Construction activities in and of themselves would not significantly affect parks or recreational facilities surrounding the project site. Users of Hazard Park, the nearest park to the project site, would likely notice construction activities on the project site. Noticeable impacts to park users would include noise, dust, and traffic disruptions; however, none of these disruptions would result in the physical deterioration at Hazard Park or any of the other parks or recreational facilities listed in Table 3.13-1 of the EIR. Therefore, construction-period impacts would be less than significant.

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.

Staging for construction equipment and activities would not occur within any off-campus parkland or recreational facility. However, construction activities associated with new on-campus open space and recreational facilities could result in noise and air quality impacts on nearby sensitive receptors, including local residents, hospital patrons, or possibly users of local park and recreational facilities. These impacts could be potentially significant. Construction activities could also result in other impacts, such as traffic impacts. The reader is referred to DEIR Sections 3.2, Air Quality; 3.10, Noise; and 3.14, Traffic, for detailed descriptions of the proposed project's potential construction impacts as well as the BMPs and mitigation measures that are proposed to be implemented to minimize any adverse or potentially significant impacts. Construction impacts would be considered significant unavoidable.

The master plan is not expected to require construction of new or expanded recreational facilities to meet increased demand. Recreation impacts would be less than significant.

3.10.2 Mitigation Measures

For measures to mitigate the noise impacts from outdoor events held in proposed open space areas on the campus, please see MM-NOI-5 above and in Section 3.10 of the EIR. Please see Section 2.2.1 above and Section 3.2 of the EIR for proposed construction air quality mitigation measures.

3.10.3 Findings

For the above impacts to recreation, the following finding is made:

☐ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential impacts due to construction of on-campus open space and recreational facilities are found to be.

☒ Significant ☐ Not Significant

3.10.4 Rationale

Construction of proposed open space and recreational facilities on the campus could result in significant unavoidable air quality and noise impacts as there are no feasible mitigation measures beyond those identified in the sections above that would fully reduce impacts to less-than-significant levels. Alternatives B and C would potentially result in fewer or less intense construction impacts due to the reduced level of development under Alternative B and the limits on construction under Alternative C. However, Alternative B would not meet all of the project objectives and would not provide all of the benefits of the proposed project.

3.10.5 References

Section 3.13 of the EIR addresses the project's recreation impacts. Chapter 5 of the EIR discusses alternatives to the proposed project.

3.11 Transportation and Traffic

3.11.1 Description of Potential Effects

Construction may require temporary road or lane closures, which, in turn, would result in a decrease in roadway capacity and increased congestion. The extent of lane and sidewalk closures will not be known until individual development projects are proposed and project plans are developed. Nonetheless, to ensure construction transportation impacts due to projects proposed under the master plan would be minimized and reduced to a less-than-significant level, construction traffic control measures would be developed and implemented.

The impact of construction-generated traffic on safety could be significant for projects that would require roadways restrictions, lane closures, and similar actions.

Buildout of the master plan would result in significant impacts on the level of service at four intersections under the existing baseline plus-project scenario (study intersections 1, 9, 13, and 19) and cumulative year (2040) plus-project scenario (study intersections 9, 13, 19, and 20).

Because incremental project-related traffic in any direction during either peak hour is projected to be less than the criterion of 50 trips on CMP arterials and 150 trips in either direction during either the AM or PM peak hours, no further CMP arterial or freeway analysis is required, and the impacts on CMP facilities are considered to be less than significant.

3.11.2 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, USC) to establish new transit stops or stations or to upgrade existing transit stops adjacent to the Medical Center or in the local area.

3.11.3 Findings

For the above impacts to transportation and traffic, the following findings are made:

☒ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☒ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential impacts to transportation and traffic from the operation of the project are found to be.

☒ Significant ☐ Not Significant

3.11.4 Rationale

Significant and unavoidable traffic impacts under the existing baseline plus-project scenario (intersections 1, 9, and 19) and cumulative year (2040) plus-project scenario (intersections 9, 19, and 20) would occur. If LADOT does not approve proposed mitigation measures at intersection 13, then the impacts at that intersection would also be significant and unavoidable under both scenarios. There are no feasible mitigation measures to fully reduce impacts at the other significantly affected study intersections to a less than significant level.

Construction traffic impacts could be mitigated with implementation of MM-TRAF-1 above.

While Alternative B analyzed in the EIR would result in less development and therefore fewer traffic impacts than the proposed project, it would not meet all of the project objectives and would not provide all of the benefits of the proposed project.

3.11.5 References

Section 3.14 of the EIR addresses the project's transportation and traffic impacts. Chapter 5 of the EIR discusses the alternatives to the proposed project.

3.12 Utilities, Service Systems and Energy

3.12.1 Description of Potential Effects

Although new on-campus sewer lines may have to be constructed or existing campus sewer lines relocated to accommodate future master plan projects, no new or expanded offsite water or wastewater treatment facilities would be required as result of development under the master plan and therefore, impacts would be less than significant.

The potential increase in water consumption due to development under the master plan would be consistent with the Los Angeles Department of Water and Power's Urban Water Management Plan (UWMP). No new entitlements are anticipated through 2035, which is the horizon year for the UMWP's water demand forecasts. For master plan projects proposed beyond the year 2035, it's not known whether sufficient water supplies and entitlements would accommodate those projects' water demands; therefore, for the purposes of the EIR, the proposed long-term impacts (beyond 2035) are considered to be potentially significant.

Operation of proposed master plan facilities would not require or result in the construction of new off-campus stormwater drainage facilities or the expansion of existing facilities.

All wastewater generated on the campus would ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity to accommodate the project as well as existing commitments.[1] Consequently, significant impacts on the city's wastewater treatment system are not anticipated. Additionally, the local sewer system may have sufficient capacity to accommodate wastewater flows from master plan development. However, if the City of Los Angeles Bureau of Sanitation (BOS) determines that there is insufficient capacity in local sewer lines to accommodate project flows, the impact would be significant.

Construction activities and operation of projects under the master plan would not require additional energy capacity to meet the increased demand. The proposed master plan includes energy-efficient project design features and outlines plans to construct and implement sources of solar electric power, solar thermal and hot water, as well as ground-source heating for various facilities. These efforts, combined with compliance with Title 24's energy conservation standards for new construction would help to offset any additional energy consumption as a result of the proposed project. SoCalGas has projected natural gas supplies through the year 2030 and estimates that available capacity will exceed demand by 48%. Given projected natural gas supply and consumption trends, it is likely that there will be sufficient supply beyond 2030; however, SoCalGas has not made projections beyond that year. Therefore, for the purposes of this EIR, the impacts on natural gas supplies due to master plan projects constructed after 2030 are considered to be potentially significant. The net increase in the consumption of transportation fuels would represent an insignificant percentage of the anticipated amount of fuel that would be consumed statewide in the future (year 2030).

3.12.2 Mitigation Measures

MM-UTL-1: In conjunction with preparation of a subsequent CEQA environmental document for any future development project under the master plan 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.

[1] A. Poosti, Los Angeles Bureau of Sanitation, personal communication, July 16, 2014.

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.

No feasible mitigation measures have been identified to address long-term impacts on natural gas supplies due to master plan projects developed after 2030.

3.12.3 Findings

For the above impacts to transportation and traffic, the following finding is made:

☐ Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the final EIR.

☐ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency

☒ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The potential impacts to utilities from the operation of the project are found to be.

☒ Significant ☐ Not Significant

3.12.4 Rationale

If it's determined that future water supplies for master plan projects far in the future (beyond year 2035) would not be sufficient, the impact would be significant and unavoidable. No feasible measures have been identified to reduce these potential impacts to a less than significant level.

Impacts on natural gas supplies are considered to be potentially significant for master plan projects developed beyond the year 2030. No feasible mitigation measures have been identified beyond the energy conservation measures identified above to address long-term impacts on natural gas supplies due to master plan projects developed after 2030. Although Alternative B would result in less demand for water and natural gas due to the reduced level of development proposed under this alternative, Alternative B would not meet all of the project objectives or provide all of the benefits of the proposed project.

3.12.5 References

Section 3.15 of the EIR addresses the project's utilities impacts. Chapter 5 of the EIR discusses the proposed project alternatives.

4 Alternatives Considered and Proposed Project

Section 15126.6 of the CEQA Guidelines requires an evaluation of the comparative effects of a reasonable range of alternatives to the project that would feasibly attain most of the project's basic objectives and would avoid or substantially lessen any of the significant impacts of the project. A feasible alternative is one that can be accomplished successfully in a reasonable period of time, taking into consideration economic, legal, social, and technological factors. The range of alternatives is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasonable choice. Chapter 5, Comparison of Alternatives, of the EIR discusses two project alternatives and the No Project alternative that were carried forward in detailed analyses. Chapter 5 also discussed several alternatives that were considered but not carried forward.

The objectives of the master plan are to:

- Achieve a community-friendly campus
- Promote healthy lifestyles and wellness
- Maximize access to the medical center by the community
- Provide opportunities for appropriate education and job training
- Incorporate on-campus business opportunities
- Plan for future program development

4.1 Alternatives Considered but Not Analyzed in the EIR

Alternatives that were considered but not carried forward in the EIR included Full Adaptive Re-Use and Initial Master Plan Options, which included the following: Path and Place, Central Green, Urban Cross Axis, Green Ribbon. A detailed description of these alternatives and an explanation of why they were not carried forward are included in Chapter 5 of the EIR.

4.2 Alternatives Analyzed in the EIR

Two build alternatives and the No Project Alternative were analyzed in detail in the EIR. These alternatives represent conceptual designs and, therefore, some flexibility within each conceptual alternative is anticipated in order to meet the future needs of at the LAC+USC Medical Center Campus. The following discussion is a brief summary of each of the alternatives analyzed in this EIR.

Alternative A – No Project

Since no master plan development would occur under this alternative, none of the unavoidable significant adverse master plan impacts to aesthetics, air quality, cultural resources, transportation/traffic, greenhouse gas emissions, or noise and vibration would occur. However,

as described in the Building & Site Assessment Report prepared as part of the master plan process, existing utility infrastructure on the campus is in poor condition and needed upgrades or replacement (LBL Inc., 2013) would not occur under the No Project Alternative. In addition, the proposed improvements to hydrologic conditions through water quality BMPs and increased pervious surface area would not occur under the No Project Alternative. The addition of open spaces throughout the campus would also not be built under this alternative and other benefits to the community would not occur. None of the master plan objectives would be met with this alternative.

Alternative B – Reduced Development Alternative

Alternative B would be a reduced-development alternative to the proposed master plan and would include the following exceptions:

Alternative B would only include one of the proposed three new inpatient towers in the area now occupied by the Outpatient Department and Interns and Residents buildings.

Alternative B would only include the development of 1/3 of the Biotech Research or workforce housing buildings proposed for the west campus. This would result in approximately 211,667 square feet, as opposed to 635,000 square feet of biotech research development under the proposed master plan.

Under this alternative, four of the six objectives of the master plan would be met, such as increased open space, community space, parking, and improvements to wayfinding and circulation. However, this alternative would include the addition of less inpatient beds and less development of biotech research capabilities and facilities.

Alternative C – Individual Development Zone Construction Alternative

Alternative C identifies distinct development zones as part of the master plan that would be constructed individually, rather than developing elements of the master plan on multiple zones concurrently. The development zones consist of the Main Campus West, North of Mission Road, and Future Inpatient Bed Expansion zones.

Although this alternative would include the same project elements or component as the proposed master plan, the individual project components would be constructed in only one zone at a time . By limiting construction activity to one development zone at a time, this alternative would reduce the potentially significant construction-related impacts of the master plan, including construction impacts to air quality, greenhouse gas emissions, traffic, and noise. Construction activities, and thus construction impacts, would be less intense than if construction occurred concurrently at multiple sites and zones as could conceivably occur under the proposed master plan. However, it should be noted that this alternative would not reduce the potential for operational impacts due to increased traffic and noise, nor would it reduce the impacts to aesthetics and cultural resources due to the demolition of Women's and Children's Hospital. Additionally, limiting construction to only one zone of the campus at a time may potentially result in construction occurring over a longer period of time within the 25-year timeframe of the master plan and delay completion of facilities that are both needed by the community and necessary to fufill the master plan objectives. The delay in constructing proposed master plan facilities could also increase construction costs because of the escalating cost of construction over time. This alternative would also not allow the same level of flexibility as the proposed project for sequencing construction elements. For example, a situation may arise where funding becomes available for a limited time for two elements of the master plan, but because those individual

projects are located in different zones of the campus, they could not be constructed at the same time, under Alternative C, despite funding being available to do so. Additionally, this alternative is not recommended and could be impractical because it could restrict the County from proceeding with projects located in adjacent zones that would need to overlap or be constructed concurrently because the projects are related functionally or programmatically or would need to be completed in advance of a subsequent future project.

4.3 Proposed Project

This section presents the proposed project, including a discussion of the rationale for the selection.

The proposed LAC+USC Medical Center Campus Master Plan Project consists of a master plan, which is envisioned for a period of approximately 25 years, that would be used to guide future development of the campus and influence the delivery of health care services and health-related community programs.

The objectives of the master plan are to:

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

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

The main elements of the proposed master plan are listed below:

- Inpatient Facilities
- Outpatient Facilities
- Medical Center Offices
- Central Utility Expansion
- Pedestrian Circulation and Access
- Biotech Research and On-campus Housing
- Parking Facilities
- Community Open Space and Landscape Conceptual Elements

The proposed project would satisfy all six project objectives.

4.4 Environmentally Superior Alternative

Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be identified and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. In this case, the No Project Alternative would result in fewer impacts on the existing environment. However, Section 15126.6(e)(2) of the State CEQA Guidelines states if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. To determine which of the other alternatives would be environmentally superior, the analysis focused on those master plan impacts identified as significant and unavoidable. Alternative C would reduce the impacts during construction to air quality, biological resources, noise, and traffic, as it would restrict construction activities to only one zone of development at a time. However, similar to the proposed project, Alternative C would result in significant unavoidable impacts to aesthetics (scenic resources), historical resources, transportation/traffic, greenhouse gas emissions, and noise and vibration during operation of the master plan. Under Alternative B, it's possible all impacts could be reduced to less than significant with proposed mitigation, with the exception of significant unavoidable impacts to aesthetic and historic resources due to the demolition of the Women's and Children's Hospital. Therefore, Alternative B is the project alternative that would result in the fewest environmental impacts, and would be the environmentally superior alternative. However, Alternative B would not meet all of the project objectives or provide all of the benefits that could occur under the proposed master plan or under Alternative C.

5 Statement of Overriding Considerations

The proposed project would result in the following unavoidable significant adverse impacts after mitigation:

- **Air Quality**

  The primary source of PM10 and PM2.5 emissions is fugitive dust from on-site clearing and demolition. As shown in Table 3.2-9 in the EIR, implementation of Mitigation Measures AQ -1 and AQ-2 would reduce emissions, but PM10 and PM2.5 levels would remain in excess of SCAQMD thresholds. Compliance with Rule 403 would reduce PM emissions, but not to a level below thresholds. Therefore, this impact would be considered significant and unavoidable.

- **Aesthetics**

  Demolition of the Women's and Children's Hospital building, which is aesthetically noteworthy because of its architectural design and is a historical resource, would be a significant unavoidable adverse visual impact of the proposed project.

- **Cultural Resources**

  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, would be an unavoidable significant adverse historical resources impact.

- **Greenhouse Gas Emissions**

  Because project emissions would exceed the 3,000 MT CO_2e annual threshold, project generated GHG emissions would be a significant and unavoidable cumulative impact.

- **Noise and Vibration**

  While MM-NOI-1 would reduce construction noise levels, it would not eliminate the predicted noise impacts entirely; therefore, construction noise impacts are considered significant and unavoidable. Construction vibration impacts would be considered significant and unavoidable after implementation of mitigation measure MM-NOI-6.

- **Recreation**

  Construction of new on-campus landscaped open space areas and recreational facilities 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.

- **Transportation/Traffic**

  The proposed development under the master plan would generate additional vehicle trips that would result in significant traffic impacts at four study intersections (intersections 1, 9, 13, and 19) under the existing baseline plus-project scenario and four study intersections (intersections 9, 13, 19, and 20) under the cumulative year (2040) plus-project scenario. No feasible mitigation measures have been identified for intersections 1, 9, 19, and 20. As a consequence, the impacts to those intersections would be significant and unavoidable. The proposed mitigation measures at study intersection 13 would reduce the impact to less than significant. However, given the intersection is located within the City of Los Angeles and the mitigation is subject to approval by the City of Los Angeles Department of Transportation (LADOT), if LADOT does not approve the proposed mitigation, the impact at this intersection would be significant and unavoidable.

- **Utilities**

  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.

The benefits of the project are listed below. Any one of the overriding considerations of economic, social, and environmental benefits individually would be sufficient to outweigh the adverse environmental impacts of the proposed project and justify their adoption and certification of the final EIR.

1. Implementation of the proposed project would best meet the County's anticipated needs at the LAC+USC Medical Center campus.
2. Implementation of the proposed project would provide improved visual and physical connections between the LAC+USC Medical Center campus site and the surrounding community and would better integrate and make the campus more accessible to the surrounding community by enhancing access, campus identity signage and imagery, and maximizing community use of the Historic General Hospital Plaza and other similar spaces
3. Implementation of the proposed project would promote a campus orientation and environment that supports a culture of health and wellness by providing health-related activities like nutrition and life-style instruction, and providing connections to the outdoors with options for onsite outdoor activities.
4. Implementation of the proposed project would provide new recreational and open space areas on the campus, which would benefit on-campus employees, visitors, and members of the surrounding community and create a more lively and receptive pedestrian experience, provide easier access across changes in site elevation, provide active, visible, and participatory ground floor functions, and enhance safety and security for nighttime activities.
5. Implementation of the proposed project would restore the LAC+USC campus as a vibrant destination of choice, where residents and visitors can access improved healthcare facilities and programs including health education, wellness programs, and other services that promote healthier habits and lifestyles.
6. Implementation of the proposed project would replace buildings and underused space with new buildings and space that would meet seismic and fire safety requirements while also achieving sustainability initiatives.
7. Implementation of the proposed project would demonstrate sustainable design and development programs to enhance the long-term social value of the campus by designing for pragmatic long-term operations, promote efficient energy and water use, and implement LEED and CAL Green Program goals.
8. Construction of 1,245,000 square feet of new development and a 450-bed hospital addition would result in new construction jobs. Buildout of the proposed master plan would result in an increase in the number of employees on the campus. Increased short-term and long-term employment opportunities would provide economic benefits to the surrounding community and the region.

Accordingly, the County hereby concludes that the proposed project's benefits outweigh and override its unavoidable significant impacts for the reasons stated above. The County reached this decision after having done all of the following: (1) adopted all feasible mitigation measures, (2) rejected as infeasible alternatives to the project, (3) rejected alternatives that do not fully meet the project objectives (4) recognized all significant, unavoidable impacts, and (5) balanced the benefits of the proposed project against their significant and unavoidable impacts.