FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS SCH# 2016031090

OLIVE VIEW-UCLA MEDICAL CENTER CAMPUS MASTER PLAN EIR

PREPARED FOR:

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

PREPARED BY:

ICF

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Contents

1 Introduction

This document presents the findings required by the California Environmental Quality Act (CEQA) for each of the significant environmental effects identified in the Environmental Impact Report (EIR) (SCH No. 2016031090) that was prepared for the proposed Olive View-UCLA Medical Center Campus Master Plan (proposed project) and includes a Statement of Overriding Considerations, pursuant to CEQA, which states the reasons why the benefits of the project outweigh the project's unavoidable significant adverse effects. This document also describes the alternatives to the proposed project considered in the EIR, discusses whether the alternatives would avoid or minimize the significant impacts of the proposed project, identifies the environmentally superior alternative, and explains why the alternatives were rejected in favor of the proposed project.

1.1 Purpose of Findings and the Statement of Overriding Considerations

Section 21081 of the California Public Resources Code and Section 15091 of the CEQA Guidelines 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 Program (MMRP) for the proposed project, which is provided under separate cover, are those identified within this Findings and the Statement of Overriding Considerations. Pursuant to Section 21081.6, public agencies are required to provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures.

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 Olive View-UCLA Medical Center Campus Master Plan would guide development of the campus and influence the delivery of health care services and health-related community programs over a period of approximately 20+ years.

The objectives of the Master Plan are to:

1. Provide for development opportunities that are consistent with the goals and policies of the County's General Plan.
2. Reorganize, expand, and integrate outpatient services with the specific goal of meeting the community's health needs, providing patient-centered care, and improving the operational throughput to meet increasing demands.
3. Locate inpatient and outpatient services into dedicated buildings to optimize the quality of care and improve operational effectiveness, while reducing administrative, operational, and maintenance costs.
4. Comply with the Alfred E. Alquist Hospital Facilities Seismic Safety Act of 1983 (Senate Bill [SB] 1953) required by the Office of Statewide Health Planning and Development in order to ensure that the hospital can maintain its license as an inpatient care facility beyond the year 2030.
5. Identify feasible opportunities to exceed state energy requirements and pursue green building sustainable design to the maximum extent possible.
6. Develop resources that are consistent with the needs of the 2035 planning horizon.
7. Provide new medical facilities, including a new replacement hospital, to meet state standards and code requirements.
8. Provide integrated direct and coordinated care, including physical health, behavioral health, social, and other supportive services to the County's most vulnerable populations, such as those suffering from mental illness, addiction, or physical disabilities, in facilities located in a welcoming campus setting with green spaces to:
    a. ensure a seamless transition upon discharge to home or other housing options, and help patients avoid cycling in and out of emergency interventions and establish a sustainable functional life;
    b. reduce morbidity and costs, while restoring function and dignity; and
    c. improve the quality of life for the people and communities of Los Angeles County.

For the purposes of the EIR, two tiers of development have been defined and analyzed. Tier I entails near-term projects that are better defined and could be constructed subject to securing

the necessary approvals and funding, as well as other subsequent development that could occur over the next 17 years, through the year 2035. Tier I development could include the Restorative Care Village, which is composed of the Recuperative Care Center, Residential Treatment Program facility, Mental Health Wellness Center, and the new Mental Health Urgent Care Center, as well as the Ambulatory Care Center, Community Center, improvements to the existing hospital, new parking facilities, and other campus improvements that would be located predominantly in the eastern half of the current campus. Tier II development would occur beyond 2035 and could include the construction of a new inpatient hospital, Long Term Care facility, support services building, retail space, County department buildings, and the renovation and reuse of the existing inpatient hospital for other purposes. If build-out of the campus occurs as envisioned under the Master Plan, the net increase in building square footage would be approximately 1.3 million square feet, which would occur throughout the campus.

The main elements of the proposed Master Plan are listed below.

1.3 Tier I One Development

As identified above, for the purposes of this EIR, development under the Master Plan is described as occurring in two tiers, Tier I and Tier II.

Tier I Development includes:

- Recuperative Care Center
- Residential Treatment Program Facility
- Mental Health Urgent Care Center
- Mental Health Wellness Center
- Ambulatory Care Center
- Inpatient Services Improvements
- Community Center
- Central Utility Expansion
- Materials Management/Supply Services Building
- Administrative Services Building
- Community Open Space and Landscaping
- Parking, Vehicle and Pedestrian Circulation Improvements

1.4 Tier II Development

- Inpatient Services (Future Hospital)
- UCLA Faculty Offices and Medical Office Building, Educational Facilities, and Research Facilities
- Senior, Fitness, and Child Care Centers

- Long-Term Care Facility
- Retail Space
- Community Open Space and Landscaping Improvements
- Parking, Vehicle and Pedestrian Circulation Improvements
- County Fire Department, Agricultural Commissioner, and Sheriff's Buildings

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 significant impacts identified in the EIR for the proposed project.

The EIR focused on those potential effects of the proposed project on the environment that the Lead Agency has determined may be significant. Chapter 3 of the EIR determined that the proposed project would have either no impact or less than significant impacts regarding the following issue areas (please note that Chapter 3 of the EIR was organized according to the environmental categories and questions identified in the Environmental Checklist in Appendix G of the State CEQA Guidelines, which are referenced below):

No Impacts

- Biological Resources
  - Conservation Plan (Appendix G, Checklist Question IV,a)
    - Tiers I and II (construction and operational)

- Cultural Resources
  - Historical Resources (Appendix G, Checklist Question V,a)
    - Tiers I and II (construction and operational)
  - Archaeological Resources (Appendix G, Checklist Question V,b)
    - Tiers I and II (operational)
  - Human Remains Disturbance (Appendix G, Checklist Question V,c)
    - Tiers I and II (operational)
- Geology and Soils
  - Septic Tanks or Alternative Waste Disposal Systems (Appendix G, Checklist Question VII,e)
    - Tiers I and II (construction and operational)
  - Paleontological Resources (Appendix G, Checklist Question VII,f)
    - Tiers I and II (operational)
- Hazards and Hazardous Materials
  - Routine Transport, Use, or Disposal of Hazardous Materials (Appendix G, Checklist Question IX,a)
    - Tiers I and II (construction and operational)
  - Release of Hazardous Materials (Appendix G, Checklist Question IX,b)
    - Tiers I and II (operational)
  - Hazards to Schools (Appendix G, Checklist Question IX,c)
    - Tiers I and II (operational)
- Hydrology
  - Seiche, Tsunami (Appendix G, Checklist Question X,d)
    - Tiers I and II (construction and operational)
- Land Use and Planning
  - Conflicts with Applicable Plans and Policies (Appendix G, Checklist Question XI,b)
    - Tiers I and II (construction and operational)
  - Cumulative Impacts
- Noise
  - Groundborne Vibration or Groundborne Noise Levels (Appendix G, Checklist Question XIII,b)
    - Tiers I and II (operational)
  - Airstrip (Appendix G, Checklist Question XIII,c)
    - Tiers I and II (operational)
- Population and Housing
  - Displacement of Housing and People (Appendix G, Checklist Question XIV,b)
    - Tiers I and II (construction and operational)

Additionally, the County of Los Angeles, as the CEQA lead agency, determined in the NOP/IS (see Appendix A of the EIR) 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 (Appendix G, Checklist Questions X,a-e)
- Mineral Resources (Appendix G, Checklist Questions XII,a-b)

Less than Significant Impacts

The analyses presented in Chapter 3, *CEQA Environmental Impact Assessment*, of this EIR, concluded that the proposed project would result in less than significant impacts in the following categories, and therefore, no mitigation measures are required.

- Aesthetics
  - Scenic Resources (Appendix G, Checklist Question I,b)
    - Tiers I and II (construction and operational)
  - Visual Character (Appendix G, Checklist Question I,c)
    - Tiers I and II (construction and operational)
  - Light and Glare (Appendix G, Checklist Question I,d)
    - Tiers I and II (construction and operational)
  - Cumulative Impacts
- Air Quality
  - Obstruct Implementation of the Applicable Air Quality Plan (Appendix G, Checklist Question III,a)
    - Tiers I and II (construction and operational)
  - Violate Air Quality Standard (Appendix G, Checklist Question III,b)
    - Tiers I and II (operational)
  - Expose Sensitive Receptors to Substantial Pollutant Concentrations (Appendix G, Checklist Question III,c)
    - Tier I (construction and operational)
  - Objectionable Odors (construction and operation) (Appendix G, Checklist Question III,d)
    - Tiers I and II (construction and operational)
- Biological Resources
  - Species (Appendix G, Checklist Question IV,a)
    - Tiers I and II (operational)
  - Wetlands (Appendix G, Checklist Question IV,c)
    - Tiers I and II (construction and operational)
  - Wildlife Corridors and Movement (Appendix G, Checklist Question IV,d)
    - Tiers I and II (operational)
  - Local Policies or Ordinances
    - Tiers I and II (operational)
  - Riparian Habitat and Sensitive Natural Communities
    - Tiers I and II (operational)
  - Cumulative Impacts
- Energy
  - Consumption of Energy (Appendix G, Checklist Question VI,a)
    - Tiers I and II (construction and operational)
  - Local Plans (Appendix G, Checklist Question VI,b)
    - Tiers I and II (construction and operational)
  - Cumulative Impacts
- Geology and Soils
  - Soil Erosion or Loss of Top Soil (Appendix G, Checklist Question VII,b)
    - Tiers I and II (operational)
  - Use of Septic Tanks or Alternative Waste Disposal Systems (Appendix G, Checklist Question VII,e)

        - Tier I and II (construction and operational)
- Greenhouse Gas Emissions
    - Policies (Appendix G, Checklist Question VIII,b)
        - Tiers I and II (construction and operational)
- Hazards and Hazardous Materials
    - Routine Transport (Appendix G, Checklist Question IX,a)
        - Tiers I and II (construction and operational)
    - Upset and Accident conditions (Appendix G, Checklist Question IX,b)
        - Tiers I and II (operational)
    - Hazardous Materials Sites (Appendix G, Checklist Question IX,d)
        - Tiers I and II (operational)
    - Emergency response (Appendix G, Checklist Question IX,f)
        - Tier I (construction)
        - Tier II (construction and operational)
    - Cumulative Impacts
- Hydrology and Water Quality
    - Water Quality Standards (Appendix G, Checklist Question X,a)
        - Tiers I and II (operational)
    - Groundwater Supplies (Appendix G, Checklist Question X,b)
        - Tiers I and II (operational)
    - Drainage and Flooding (Appendix G, Checklist Question X,c)
        - Tiers I and II (construction and operational)
    - Stormwater Runoff (Appendix G, Checklist Question X,c)
        - Tiers I and II (construction and operational)
    - Cumulative Impacts
- Noise
    - Airstrip (Appendix G, Checklist Question XIII,c)
        - Tiers I and II (construction and operational)
    - Cumulative Impacts
- Population and Housing
    - Population Growth (Appendix G, Checklist Question XIV,a)
        - Tiers I and II (construction and operational)
    - Displace Substantial Numbers of Existing Housing Units (Appendix G, Checklist Question XIV,b)
        - Tiers I and II (construction and operational)
    - Cumulative Impacts
- Public Services
    - Police and Fire services (Appendix G, Checklist Question XV,a)
        - Tiers I and II (operational)
    - Schools (Appendix G, Checklist Question XV,a)
        - Tiers I and II (operational)
    - Parks (Appendix G, Checklist Question XV,a)
        - Tiers I and II (operational)
    - Cumulative Impacts
- Recreation
    - Increased Use of Existing Parks (Appendix G, Checklist Question XVI,a)
        - Tiers I and II (construction and operational)

    - Require Construction of Recreational Facilities (Appendix G, Checklist Question XVI,b)
        - Tiers I and II (construction and operational)
    - Cumulative Impacts
- Transportation/Traffic
    - Conflict with Transportation Program, Plan, Ordinance, or Policy (Appendix G, Checklist Question XVII,a)
        - Tier I (construction and operational)
    - Conflict with CEQA Guidelines Section 15064.3 subdivision (b) (Appendix G, Checklist Question XVII,b)
        - Tiers I and II (construction and operational)
    - Increase Hazards due to Geometric Design Feature (Appendix G, Checklist Question XVII,c)
        - Tiers I and II (operational)
    - Inadequate Emergency Access (Appendix G, Checklist Question XVII,d)
        - Tiers I and II (operational)
- Tribal Cultural Resources
    - Tribal Cultural Resources (Appendix G, Checklist Questions XVIII,a-b)
        - Tiers I and II (operational)
- Utilities
    - Exceed Water or Wastewater Treatment Stormwater Drainage, Electric Power, Natural Gas, or Telecommunications Facilities (Appendix G, Checklist Question XIX,a)
        - Tiers I and II (construction)
    - Water Supplies (Appendix G, Checklist Question XIX,b)
        - Tiers I and II (construction)
    - Adequate Capacity for Wastewater Treatment Provider (Appendix G, Checklist Question XIX,c)
        - Tiers I and II (construction)
    - Generation of Waste (Appendix G, Checklist Question XIX,d)
        - Tiers I and II (construction)
    - Compliance with Solid Waste Regulations (Appendix G, Checklist Question XIX,e)
        - Tiers I and II (construction and operational)
- Wildfire Hazards
    - Emergency Response Plan (Appendix G, Checklist Question XX)
        - Tiers I and II (operational)

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 (Appendix G, Checklist Question III,b)
        - Tier I (construction)
- Biological Resources
    - Species (Appendix G, Checklist Question IV,a)

        - Tiers I and II (construction)
    - Local Policies (Appendix G, Checklist Question VI,e)
        - Tiers I and II (construction)
- Cultural Resources
    - Archaeological Resources (Appendix G, Checklist Question VI,b)
        - Tiers I and II (construction)
    - Human Remains Disturbance (Appendix G, Checklist Question VI,c)
        - Tiers I and II (construction)
    - Cumulative Impacts
- Geology and Soils
    - Earthquake Fault Rupture, Seismic Shaking, Ground Failure, or Landslides (Appendix G, Checklist Question VII,a)
        - Tiers I and II (construction and operational)
    - Soil Erosion or the Loss of Topsoil (Appendix G, Checklist Question VII,b)
        - Tiers I and II (construction)
    - Liquefaction (Appendix G, Checklist Question VII,a)
        - Tiers I and II (construction and operational)
    - Expansive Soil (Appendix G, Checklist Question VII,d)
        - Tiers I and II (construction and operational)
    - Paleontological Resources (Appendix G, Checklist Question VII,f)
        - Tiers I and II (construction)
    - Cumulative Impacts
- Greenhouse Gas Emissions
    - Generate GHG Emissions (Appendix G, Checklist Question VIII,a)
        - Tiers I and II (construction and operational)
- Hazards and Hazardous Materials
    - Upset and Accident Conditions (Appendix G, Checklist Question IX,b)
        - Tiers I and II (construction)
    - Hazardous Materials Sites (Appendix G, Checklist Question IX,d)
        - Tiers I and II (construction)
- Hydrology
    - Water Quality Standards (Appendix G, Checklist Question X,a)
        - Tiers I and II (construction)
    - Groundwater Supplies (Appendix G, Checklist Question X,b)
        - Tiers I and II (operational)
    - Drainage (Appendix G, Checklist Question X,c)
        - Tiers I and II (construction)
    - Degrade Water Quality (Appendix G, Checklist Question X,a)
        - Tiers I and II (construction)
- Noise
    - Increased Ambient Noise (Appendix G, Checklist Question XIII,a)
        - Tiers I and II (operational)
- Public Services
    - Police and fire services (Appendix G, Checklist Question XIV,a)
        - Tiers I and II (construction)
- Transportation/Traffic
    - Inadequate Emergency Access (Appendix G, Checklist Question XVII,d)

    - Tiers I and II (construction)
- Tribal Cultural Resources (Appendix G, Checklist Question XVIII)
    - Cumulative Impacts
- Utilities
    - Water Supplies (Appendix G, Checklist Question XIX,a)
        - Tiers I and II (construction)
    - Adequate Capacity for Wastewater Treatment Provider (Appendix G, Checklist Question XIX,c)
        - Tiers I and II (operational)
- Wildfire Hazards (Appendix G, Checklist Question XX)
    - Cumulative Impacts

Significant Unavoidable Impacts

Significant unavoidable impacts would occur as a result of the proposed Olive View–UCLA Medical Center Campus Master Plan Project in the following resource areas:

- **Air Quality (only Tier II Construction, Operational, and Cumulative Impacts)** (Appendix G, Checklist Questions III,b-c)

  Tier II would result in the generation of air pollutant emissions from heavy-duty construction equipment, construction worker vehicle trips, material deliveries, trips by heavy-duty haul trucks, earthwork activities, and other construction activities. Such emissions could exceed construction thresholds for regional and localized pollutant emissions and expose sensitive receptors to substantial pollutant concentrations depending on the schedules, equipment used, and material movement required. Implementation of Mitigation measures MM-AQ-1, MM-AQ-2, MM-AQ-3, and MM-AQ-4 would reduce emissions, however, emissions from Tier II construction activities may still exceed South Coast Air Quality Management District (SCAQMD) thresholds. Therefore, this impact would be considered significant and unavoidable.

  Tier II operations would involve emissions of air pollutants from building natural gas use, stationary sources, worker and vehicle trips, and other sources that could exceed operational thresholds. Mitigation measures MM-AQ-5 would reduce operational emissions but may not reduce emissions to a less-than-significant level.

  Cumulative impacts on Basin air quality with respect to criteria pollutant emissions could exceed applicable thresholds under Tier II. Therefore, cumulative impacts would be considered significant and unavoidable.

- **Greenhouse Gas Emissions (both Tier I and Tier II Construction, Operational, and Cumulative Impacts)** (Appendix G, Checklist Question VIII,a)

  Greenhouse Gas Emissions generated during construction and operational activities for both Tier I and Tier II could exceed the 3,000 MT CO_2e annual threshold. While MM-GHG-01 would reduce the project's GHG emissions, it cannot be stated with certainty that emissions would be reduced to comply with the long-term GHG reduction targets and goals of applicable regulatory programs. As such, impacts would be significant and unavoidable.

GHG emissions and climate change are exclusively cumulative impacts. The project would be inconsistent with statewide targets in the post-2030 timeframe. Due to the lack of a details regarding buildout long-term, the proposed project's incremental contribution to cumulative impacts related to GHG emissions and reduction targets and plans would be cumulatively considerable even with implementation of MM-GHG-C1 and MM-GHG-O1. Therefore, it cannot be stated with certainty that the proposed project would result in emissions that would represent a fair share of the requisite reductions to achieve statewide reduction targets. As such, cumulative impacts would be significant and unavoidable.

- **Noise and Vibration (both Tier I and Tier II Construction and Operational Impacts)** (Appendix G, Checklist Questions XIII,a,b)

  While mitigation measure 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 could significantly affect nearby noise sensitive uses, while mitigation measure MM-NOI-C2 reduce construction vibration levels, it may not eliminate the predicted significant impacts entirely, therefore, construction vibration impacts would be considered significant and unavoidable after mitigation.

- **Transportation/Traffic (Tier II Operational and Cumulative Impacts)** (Appendix G, Checklist Question XVII,a)

  The increase in the number of project trips associated with full buildout of Tier II development and the expected increase in the number of ambient trips beyond 2035 could lead to significant impacts at some intersections in the vicinity. Tier II development could also result in significant traffic impacts on freeway mainline segments and freeway ramp queues. However, given that Tier II development would occur far in the future, beyond 2035, the extent of potential impacts on the local and regional transportation system have not been quantified and consequently mitigation measures have not been identified, but for the purposes of this EIR, the Tier II traffic impacts are considered to be significant and unavoidable.

- **Utilities (both Tier I and Tier II Operation and Cumulative Impacts)** (Appendix G, Checklist Questions XIX,b-c)

  Proposed development under the Master Plan would increase the consumption of water. The Water Supply Assessment prepared for the proposed project concluded that projected water supply during normal, single-dry, and multiple-dry water years, as included in the 25-year projection contained in the city of Los Angeles's *Urban Water Management Plan*, can accommodate the projected maximum water demand associated with Tier I and Tier II development. However, it should be noted that the UWMP projections end in 2040, while the Master Plan is intended to provide a framework and vision for development on the campus that could occur beyond 2040. For projects constructed in Tier II of the Master Plan, if it is determined that the water supplies are insufficient, and new offsite water infrastructure is required, there could potentially be significant and unavoidable impacts. Similarly, development under the Master Plan would also increase wastewater flows from the campus that would be conveyed to local sewer lines. The city of Los Angeles Bureau of Sanitation (BOS) conducted a preliminary evaluation of the project's potential impacts on

existing wastewater flows, which found that based on the current approximate flow levels, the sewer system may be able to accommodate the additional wastewater flow that could occur due to new development under the Master Plan for Tiers I and II. However, further evaluation would be needed as part of the permit process to identify a specific sewer connection point. If BOS determines that there is insufficient capacity in the local sewer lines that would serve an individual future project, then the impact would be considered to be significant. Since the County cannot compel BOS to conduct further gauging and evaluation, for the purposes of the EIR, the impacts on local sewer lines are considered to be potentially significant and unavoidable.

The cumulative increases in regional and local study area populations would increase the demand for utilities services. Because the service areas for the various utility providers (water, sewer and wastewater, stormwater, solid waste, natural gas, and electricity) varies widely, and, in some cases, covers large geographic areas (e.g., SoCalGas or LADWP), it is possible that increased demand due to future cumulative development within the service areas could require additional utility capacity and supplies to meet projected future demand and maintain adequate levels of service, notwithstanding future savings resulting from increased energy efficiencies. As such, cumulative impacts would be considered 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 Air Quality

3.1.1 Description of Potential Effects (Appendix G, Checklist Questions III,b-c)

Tier I

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). However, implementation of proposed mitigation measures would reduce construction-related emissions to a less-than-significant level.

Emissions from Tier I construction activities that overlap with Tier I development operational emissions could exceed SCAQMD thresholds for VOCs and NOx, a significant impact. However, implementation of proposed mitigation measures would reduce potential impacts to less than significant.

Tier II

Construction and operational emissions under Tier II could exceed, depending on specific project details including construction schedule and activities, the applicable air quality thresholds. Because Tier II projects are expected to occur far in the future, and specific details about Tier II are unknown, emissions associated with construction and operational activities under Tier II have not been quantified. Although the mitigation measures identified below would be implemented, Tier II could potentially result in emissions that still exceed regional or localized standards and would be a significant impact.

Cumulative Impacts

As stated above, the project is consistent with City of Los Angeles' General Plan and regional planning documents and thus consistent with the region's air quality plan. However, emissions associated with construction and operation of Tier II of the proposed project have not been quantified as details have not been fully developed, and are therefore considered significant and unavoidable. Cumulative impacts on Basin air quality with respect to criteria pollutant emissions could exceed applicable thresholds under Tier II. As a consequence, Tier II development could result in a cumulatively considerable contribution to a significant cumulative air quality impact.

3.1.2 Mitigation Measures

Tiers I and II

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 minimize particulate matter and NO_X emissions during construction of Tier I projects, the County (or its contractors) will use off-road equipment that meets or exceeds U.S. Environmental Protection Agency (EPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, CARB-certified Level 3 Diesel Particulate Filter (DPFs) or equivalent.

Tier II

MM-AQ-3: In the event that construction-period emissions under Tier II exceed regional or localized emissions standards in effect at the time that Tier II project details are known, the County (or its contractors) will implement the following or more effective measures to achieve emissions reductions:

1. For exceedances of particulate matter or NO_X regional or localized significance thresholds, the County (or its contractors) will:

    a. Use off-road equipment that meets or exceeds U.S. Environmental Protection Agency Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during all phases of construction;

    b. Outfit all off-road equipment with Best Available Control Technology (BACT) devices including, but not be limited to, CARB certified Level 3 Diesel Particulate Filters (DPFs); and

    c. Require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer trucks (e.g., material delivery trucks and soil and aggregate import/export) that meet CARB's 2010 engine emission standards of 0.01 gram per brake horsepower-hour (g/bhp-hr) of PM and 0.20 g/bhp-hr of NO_X emissions or newer, cleaner trucks.

    d. The aforementioned off-road and on-road requirements will be included in the County's applicable bid documents, and the awarded construction contractor must demonstrate the ability to successfully supply compliant equipment prior to commencement of any construction activities. A copy of each equipment unit's certified tier specification and, where applicable, CARB or SCAQMD operating permits, will be made available to the Construction Monitor upon request at the time of mobilization of each applicable unit of equipment. All construction contractors supplying off-road equipment greater than 50 hp to the campus will be encouraged to apply for SCAQMD SOON funds, and SCAQMD's website containing information about the program will be provided to each contractor.

    e. In recognition that the Tier II developments would occur after 2035 and that more effective measures would likely be available at that time to reduce pollution emissions, the County (or its contractors) will implement all other current and feasible mitigation that are readily available for deployment at the time a Tier II project's details are known, which may include, but is not limited to, the use of construction equipment with the latest emission control systems/technologies that would result in emission reductions exceeding those

achieved by presently available technologies (e.g., Tier 4 off-road equipment and 2010 model year or newer trucks). Such technologies may include zero-emission or near-zero off-road and on-road equipment that is readily available in the South Coast Air Basin. To stay abreast of the latest available mitigation, the County will conduct a review of SCAQMD's Air Quality Analysis Handbook website on an annual basis to ensure that recommended mitigation measures by the District are considered for each future discretionary project.

MM-AQ-4: Prior to issuance of a grading permit for new individual projects occurring under the Tier II development phase that are 1 acre or larger, the County will conduct an air quality analysis of the localized emissions (NO_X, CO, PM_{10}, and $PM_{2.5}$) associated with the maximum daily grading activities for the proposed development. If the localized air quality analysis shows that emissions would exceed SCAQMD's air quality CEQA localized thresholds for those emissions, mitigation identified in **MM-AQ-3** will be implemented and/or the maximum-daily grading activities of the proposed development will be limited to the extent feasible.

MM-AQ-5: In the event that operational emissions under Tier II exceed regional or localized emissions standards in effect at the time that Tier II project details are known, the County (or its contractors) will implement the following to achieve emissions reductions upon construction:

1. Increase energy efficiency by at least 10 percent beyond the Title 24 standard in place at the time of construction, unless demonstrated to be infeasible.
2. Utilize low VOC coatings (VOC content less than or equal to 25 grams per liter) for periodic painting and facility upkeep.
3. Install solar water heaters.
4. Maximize interior day light and utilize high efficiency lighting.
5. Increase roof/ceiling insulation beyond the American Society of Heating, Refrigeration and Air Conditioning Engineers Standard 90.1-2010.
6. Install weather-based irrigation controllers to reduce outdoor water consumption.
7. Implement travel demand reduction measures (TDM) for employees, including, but not necessarily limited to measures such as:
    - Providing bicycle parking for at least five percent of full-time-equivalent campus employees.
    - Providing preferential carpool spaces within proposed parking structures on the campus.
    - Provide shuttles for visitors and employees from Metrolink and/or Metro Rail stations to reduce vehicle trips.
8. Incorporate onsite renewable energy production, including installation of photovoltaic cells or other options.

9. The County will give preference to vendors that use zero-emission and near-zero emission on-road haul trucks in their vehicle fleet as opposed to diesel-powered trucks.

3.1.3 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

3.1.4 Rationale

Tier I

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.

Alternative B (see Chapter 5 of the EIR and Section 4 below) could result in reduced air quality impacts compared to the proposed project. However, Alternative B would not redevelop the campus to the same extent as could occur under the Master Plan and consequently, campus improvements including landscaping, pedestrian and equestrian trails, and infrastructure improvements may be more limited than would occur under the proposed Master Plan.

Tier II

Although mitigation measures identified above would reduce potential construction and operational air quality impacts, because Tier II projects are expected to occur far in the future, beyond the year 2035, specific project details are not and cannot be known at present and accordingly, to avoid speculation, impacts have not been quantified. Nonetheless, it's possible that impacts could be significant after mitigation given the amount of Tier II development that could occur.

Although it is likely Alternative B (see Section 4 below for a discussion of this alternative) could avoid the potentially significant air quality impacts that could occur under Tier II because of the substantial reduction in Tier II development, it would not redevelop the campus to the same extent as could occur under the Master Plan and consequently, campus improvements including landscaping, pedestrian and equestrian trails, and infrastructure improvements may be more limited than would occur under the proposed Master Plan..

3.1.5 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.

3.2 Biological Resources

3.2.1 Description of Potential Effects (Appendix G, Checklist Questions IV,a,e)

Tier I

The project site and biological study area include two sensitive vegetation communities: California sagebrush scrub and coast live oak woodland, if project construction requires the removal of either of these sensitive vegetation communities, the impact could be significant. Lighting, noise, traffic, or other operational impacts from new Master Plan development and activities may affect California gnatcatcher, if present, in the suitable California sagebrush habitat at the eastern end of the campus.

The removal or modification of abandoned buildings that provide suitable roosting habitat within the project area may result in impacts on two bat species: pallid bat and Townsend's big-eared bat. Construction activities may also affect other special-status species, including coast horned lizard, silvery legless lizard, and San Diego woodrat; these species occur throughout Southern California.

Tier I improvements at the eastern end of the campus that are less clearly defined (e.g., recreational trails and facilities) may result in some permanent loss of suitable California sagebrush habitat that may be used by coastal California gnatcatcher.

Construction activities for Tier I may also result in direct and indirect impacts to nesting birds protected under the Migratory Bird Treaty Act and temporarily cause portions of the site to be inaccessible to bird species in the area. Furthermore, construction activities could affect a small amount of potential jurisdictional waters on the campus, including two blue line concrete box culverts and nine blue line and non-blue line features. These features have limited functions and values and are ephemeral in nature.

Tier II

Tier II impacts would be similar to those under Tier I above with the exception of the impacts to California sagebrush habitat on the eastern end of the campus, which would likely not be affected by Tier II improvements.

3.2.2 Mitigation Measures

Tiers I and II

MM-BIO-1: Prior to the commencement of construction activities, a habitat assessment will be done by a qualified bat biologist to identify buildings within the project area that are suitable roosting habitat for bats. The following measures would apply to structures with bat roost potential, as determined by a qualified biologist:

- To avoid impacts to roosting bats, preconstruction surveys will be conducted prior to work occurring within the vicinity of, or removal of, vacant buildings. A qualified bat biologist will be retained to conduct bat and bat roosting site surveys between May 1 and July 30, prior to commencement of construction activities. This pre-construction survey will be conducted at the non-vacant and vacant buildings determined to be potentially suitable for roosting bats. The survey must occur during maternity season to confirm whether Townsend's big-eared bat is present in the vacant buildings, the only locations with potential for this species. The survey at the buildings will involve exit counts and acoustic surveys to determine whether a structure supports a nursery or roost and by which species. For the non-vacant buildings, a structure inspection will be performed by a bat biologist to look for bat sign (e.g., guano, wall streaking).
- Preconstruction bat surveys will include evening emergence surveys performed at dusk using active full-spectrum acoustic monitoring. Work will be performed by qualified biologists, who have knowledge of the natural history of the bat species that could occur in the project area and experience conducting surveys, using full spectrum acoustic equipment. During surveys, biologists will avoid unnecessary disturbance of occupied roosts. Evening (i.e., dusk) emergence surveys will consist of at least one biologist stationed on at different vantage points from the structure, watching for emerging bats from a half hour before sunset to 1–2 hours after sunset or until visibility is no longer optimal. Full-spectrum acoustic detectors will be used during emergence surveys to assist in species identification. All emergence surveys will be conducted during favorable weather conditions (i.e., calm nights with temperatures conducive to bat activity [55°F and above] and no precipitation predicted).
- If roosting sites or bats are not found, a report confirming their absence will be sent to the CDFW, and no further action will be required.
- If it is determined that structures in the project area are being used by bats as roost sites, the following protective measures will be implemented:
    - Disturbance of maternity roosting structures or trees (e.g., structure removal, construction equipment operation near roosts, tree trimming or removal) will not occur between April 15 and the following September 15 (i.e., the maternity period) to avoid impacts on reproductively active females and active maternity roosts, whether colonial or solitary. The maternity roost will 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 will 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 (i.e., between September 16 and April 14) to preclude bats from occupying buildings during construction. Exclusionary devices will only be installed by or under the supervision of an experienced bat biologist.
- A Bat Management Plan (see **MM-BIO-2**) will be developed if a bat maternity roost, including Townsend's big-eared bat, is found in the vacant building(s), and no construction work within a 250-foot-wide buffer zone (or an alternative width, as determined in consultation with CDFW) will occur between April 1 and September 30.

MM-BIO-2: A Bat Management Plan will be developed to ensure mortality to bats does not occur. The following items will be included in the plan, at a minimum:

- For each location confirmed to be occupied by bats, the plan will detail, both in text and graphics, where exclusion devices will be placed, type(s) of exclusion material to be used, the timing for exclusion work, and the timeline and methodology needed to exclude the bats.
- Monitoring activities and schedules will be included, including frequency of monitoring, identification of structures that need to be monitored, and reporting requirements.
- The plan will be reviewed and approved by CDFW.

MM-BIO-3: Prior to construction of individual Master Plan projects, a jurisdictional delineation will be conducted within the project site for jurisdictional features, including wetlands. If jurisdictional features are not present, there is no potential for impacts to occur, and no further action will be needed. If a jurisdictional feature is found within the project disturbance limits, then the following measures would be triggered:

- **Full avoidance**: This may be possible if the jurisdictional feature is found in portions of the project site that can be avoided. In this instance, environmentally sensitive area fencing will be placed between the work area and the location of the feature. A biologist will be present during the placement of the fencing.
- **Impact**: If avoidance of jurisdictional features is not feasible, permits/agreements will be obtained from appropriate agencies (i.e., RWQCB, USACE, CDFW) prior to work within the features.

MM-BIO-4: The nesting season for birds will be avoided, or preconstruction nesting bird surveys will be conducted if construction activities are carried out during the nesting season. To ensure compliance with the MBTA and similar provisions under Sections 3503, 3503.5, 3505, 3800, and 3801.6 et seq.of the California Fish and Game Code, the County of Los Angeles, through the general contractor, will 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 proponent or construction contractor will retain a qualified biologist experienced with conducting nesting bird surveys who will conduct a nesting bird survey prior to the start of vegetation removal, building demolition, or noise-generating construction activities within any potential nesting habitat (i.e., all vegetation, buildings, etc.). The size of the nesting bird survey area will be determined by a qualified biologist at the time of the survey and include the entire limits of disturbance. It will also include a buffer area, if deemed necessary by the biologist. The

preconstruction nesting bird survey will be conducted no more than seven days prior to initiation of vegetation removal, building demolition activities, or noise-generating construction activities. If no active nests are detected during these surveys, no restrictions on project activities will be necessary.

- If active nests are not found, then no potential for impact to nesting birds (or raptors) will occur and no further action will be needed.
- If an active nest(s) is observed, then an appropriate buffer (no-construction activity buffer) will be established by the biologist to ensure that nest abandonment does not occur due to the construction activities. All no-construction activity buffer areas will be clearly demarcated in the field with stakes and flagging that are visible to construction personnel.

MM-BIO-5: Prior to construction of Master Plan projects that could result in tree removal or pruning, a qualified arborist will inventory native oak trees on the project site in support of an Oak Tree Permit, if required. 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 will include information about the protection of oak trees that may be adjacent to construction activities that are to remain. The Oak Tree Report will also include the proposed replanting plan, in accordance with the required replacement ratio, for any oak trees that are to be removed.

MM-BIO-6: Prior to construction within the eastern portion of the project site that could temporarily affect California sagebrush scrub as identified in Figure 3.3-3 of the Master Plan EIR, a Habitat Mitigation Monitoring Plan (HHMP) will be created. The Plan will include, at a minimum, the following requirements:

- Vegetation monitoring will be performed in the spring-summer, or as specified in the HMMP, within California sagebrush scrub habitat proposed for temporary impact. A list of native species present will be compiled, and the absolute percent cover of each species will be estimated. This information will set the performance standards and success criteria for the HMMP.
- The HMMP will provide a map showing the location of each area proposed for impact and the absolute percent cover of each native species within the impact area.
- Restoration monitoring will be performed for 5 years or until success criteria are met with monitoring every quarter for the first 2 years and annually thereafter.
- The monitoring will include annual vegetation sampling beginning after the first year. The sampling will occur in the window of March to June, or as specified within the HMMP. The sampling will provide absolute percent cover of native shrubs and forbs/grasses.

3.2.3 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

3.2.4 Rationale

Impacts associated with project construction would be reduced to less than significant with implementation of the above listed mitigation measures.

3.2.5 References

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

3.3 Cultural Resources

3.3.1 Description of Potential Effects (Appendix G, Checklist Questions IV,b,c)

Archaeological Resources

Tiers I and II

Surface disturbances over the past 130 years have probably destroyed intact archaeological resources on the campus. Therefore, the likelihood of encountering prehistoric and historical archaeological resources is low. However, based on consultation with a tribal representative of the Fernandeño Tataviam Band of Mission Indians in 2017 (see Section 3.16, Tribal Cultural Resources, of this EIR), it has been determined that the campus is within the known use radius of two tribal cultural resources, as well the vicinity of natural springs and mature oak trees. As a consequence, and given the campus' location along the foothills, there is increased potential for subsurface tribal cultural resources in the vicinity of the campus. Therefore, the possibility exists that during construction structural demolition, grading, and excavation for new building foundations, new internal roadways, and utility infrastructure, as well as parking structures, could affect unknown buried archaeological resources for Tiers I and II. Disturbance or destruction of archaeological resources, resulting in a substantial adverse change in the significance of the resource, would be a significant impact for Tiers I and II. Construction impacts would vary, depending on final plans, and need to be analyzed in detail to determine what level of monitoring, if any, would be required.

Cumulative Impacts

The study area for the cumulative impacts analysis of prehistoric archaeological resources consists of the traditional tribal territory of the Tongva nation. The study area for the cumulative impacts analysis of historic archaeological resources consists of the Los Angeles metropolitan region. Growth and development in the cumulative impacts study areas could result in significant impacts if prehistoric or historic archaeological resources are encountered and disturbed or damaged during construction activities. In addition, although the potential for an individual cumulative project to affect significant cultural resources is unknown, given the geographic extent of the cumulative impacts study areas, it is probable for cumulative growth and development to affect significant prehistoric or historical archaeological resources. Although the likelihood of encountering prehistoric or historic archaeological resources on the Olive View–UCLA Medical Center Campus is low, the possibility remains for project excavation to affect unknown archaeological resources, a potentially significant project impact.

3.3.2 Mitigation Measures

Archaeological Resources

Tiers I and II

The following measures are proposed to mitigate impacts to archaeological resources:

MM-CR-1: Train Construction Personnel. Prior to any ground disturbance, all construction personnel will be trained to recognize possible buried cultural and tribal cultural resources during construction. Training will inform construction personnel of the procedures to be followed upon discovery of cultural and tribal cultural resources, including Native American burials. Training will make construction personnel aware that unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order and violators will be subject to prosecution under appropriate state and federal laws. Violations will be grounds for removal from the project.

MM CR-2: **Cultural Resources Monitoring.** Cultural resources monitoring of ground-disturbing activities within undisturbed native soils will be conducted by a qualified archaeologist who is familiar with the types of cultural and tribal cultural resources that could be encountered in the project area. The monitor will be under the direct supervision of an archaeologist who meets the national standards for archaeology, as set by the Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation. Ground-disturbing activities include, but are not limited to, auguring, excavation, geotechnical investigations, vegetation clearing, ground-surface leveling, trenching, and conventional mass grading. A single monitor will be assigned to observe two or more simultaneous ground-disturbing activities that occur less than 50 feet away from each other. Additional monitors will be assigned if two or more simultaneous ground-disturbing activities occur more than 50 feet away from each other. Monitors will complete a daily activity log.

MM-CR-3: Native American Tribal Monitoring. If intact prehistoric cultural resource deposits, as determined by the project archaeologist, and/or tribal cultural resources, as determined in consultation between the Fernandeño Tataviam Band of Mission Indians and the County, are

identified during ground-disturbing activities within native soils, Native American tribal monitoring will be conducted by a Native American monitor from the Fernandeño Tataviam Band of Mission Indians. A single tribal monitor will be assigned to observe two or more simultaneous ground-disturbing activities that occur less than 50 feet away from each other. Additional tribal monitors will be assigned if two or more simultaneous ground-disturbing activities occur more than 50 feet away from each other. The tribal monitors will represent the tribe's interests and follow the NAHC's Guidelines for Tribal Monitors. Monitors will complete a daily activity log.

MM-CR-4: **Discovery of Cultural and Tribal Cultural Resources**. If cultural resources or tribal cultural resources are encountered during ground-disturbing activities, cultural and tribal monitors will be empowered to divert ground-disturbing activities within 50 feet of the discovery until a qualified archaeologist can determine whether the resource is a unique archaeological resource or historical resource, as defined in PRC Section 21083.2 and/or 14 California Code of Regulations Section 15064.5, or tribal cultural resource, as defined in PRC Section 21074 and determined in consultation with the tribe. Work may continue in other areas. Tribal monitors will cooperate with the qualified archaeologist to locate all cultural materials exposed during ground-disturbing activities. All cultural resources recovered will be documented on DPR Series 523 forms.

MM-CR-5: Treatment of Cultural and Tribal Cultural Resources. If the qualified archaeologist determines that a discovery is a historical resource (as defined in **MM-CR-4**) of an archaeological nature or, as determined in consultation between the tribe and the County, a tribal cultural resource, then the mitigation standards of 14 California Code of Regulations Section 15126.4(b), which specifies that preservation in place will be the preferred manner of mitigation, will be implemented.

If preservation in place is not feasible, a cultural and/or tribal cultural resources treatment plan will be prepared, pursuant to 14 California Code of Regulations Section 15126.4(b) and the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation. The treatment plan will include provisions for (i) assessing and treating the identified resources, (ii) reporting results in a timely manner, (iii) providing an opportunity for the tribe to recover the material, and (iv) providing comments on the draft report. The tribe will be afforded an opportunity to review the plan prior to implementation. The plan will be submitted to the Los Angeles County Department of Public Works prior to treatment of the historical resource, unique archaeological resource, or tribal cultural resource.

A preliminary draft monitoring compliance report will be submitted within 3 months of the end of project construction activity. The report, which will be prepared by a qualified archaeologist, will include documentation and interpretation regarding the identified or recovered resources. Interpretation will include full evaluation of the eligibility of the resources identified for listing in the CRHR. All surface and subsurface artifacts and features will be mapped and described in the report. The tribe will be afforded an opportunity to provide comments for inclusion in the final report. The final report will be filed at the South Central Coastal Information Center at California State University, Fullerton. One copy of the final report will be provided to the tribe.

Human Remains

Tiers I and II

MM-CR-6: Human Remains. In accordance with California Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance will occur within 50 feet of the find(s) until the Los Angeles County Coroner has made the necessary findings as to origin. Furthermore, pursuant to PRC Section 5097.98(b), remains will be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Los Angeles County Coroner determines that the remains are Native American, the NAHC will be contacted within 24 hours. The NAHC will identify the Most Likely Descendant, who will make recommendations concerning treatment of the remains within 48 hours, as provided in PRC Section 5097.98. If the County cannot come to an agreement with the Most Likely Descendant, PRC Section 5097.98(e) requires the County to "reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance."

3.3.3 Findings

For the above impacts to cultural 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 cultural resources from the proposed project are found to be.

☐ Significant ☒ Not Significant

3.3.4 Rationale

Tiers I and II

Project impacts to archaeological resources would be less than significant with implementation of the above listed mitigation measures.

Cumulative Impacts

Cumulative impacts to cultural resources would be less than significant with implementation of the above listed mitigation measures.

3.3.5 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.

3.4 Geology and Soils

3.4.1 Description of Potential Effects (Appendix G, Checklist Questions VII, a,b,d,f)

Geological Hazards

Tiers I and II

The campus is located within the vicinity of known active earthquake faults, including the Santa Susana Fault less than 0.1 mile from the site, the Northbridge Blind Thrust 0.5 miles from the site, and the Sierra Madre (San Fernando) fault 1.7 miles from the site. Moreover, the project site was previously subjected to substantial surface rupture resulting from the 1971 Sylmar Earthquake. The geologic and seismic hazards including liquefaction hazards in the northeastern portion of the project site, potential soil instability due to onsite groundwater, undeveloped areas on the campus that are subject to potential water and wild soil erosion, and the possible presence of expansive soils would be reduced by employing required standard engineering practices and compliance with the California Building Code Standards. Proposed structures would be designed to meet all applicable design and building engineering practices.

Paleontological Resources

Tiers I and II

Construction related structural demolition and grading and excavation for new foundations and access routes, as well as excavation for parking structures, have the potential to affect paleontological resources. Surface grading or shallow excavations in the uppermost few feet of the younger Quaternary alluvium in the proposed project area are unlikely to uncover significant fossil vertebrate remains. However, deeper excavations in the proposed project area that extend down into older sedimentary deposits, as well as any excavations in the Pacoima Formation in the northern portion of the campus may well encounter and consequently, could damage or destroy significant vertebrate fossils, which would be considered a significant impact for Tiers I and II.

Cumulative Impacts

Cumulative impacts could occur in three areas: soil erosion, subsidence, and unstable soils. Cumulative soil erosion impacts could occur when multiple projects disturb and expose soils during construction, resulting in erosion and the cumulative loss of topsoil. Wind or water transport of eroded soils could also result in cumulative adverse impacts on the water quality of local water bodies. Cumulative subsidence impacts could occur when multiple projects result

in the withdrawal of groundwater from the same water source or result in withdrawals, such as oil and natural gas, from local sources, thereby increasing the potential for subsidence to occur. Cumulative soil stability impacts could occur if two or more projects are in very close proximity; excavation or earthmoving activities could cumulatively increase the instability of the local geologic unit or project area slopes. Cumulative impacts to paleontological resources could occur due to construction of related projects that would cumulatively contribute to the progressive loss of paleontological resources in the region. These cumulative impacts are considered to be potentially significant.

3.4.2 Mitigation Measures

Geological Hazards

Tiers I and II

MM-GEO-C1: All recommendations included in the preliminary Geotechnical Evaluation prepared for the proposed project (see Appendix F.1 of this EIR) will be followed. A detailed subsurface geotechnical evaluation will 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 will include the following measures to mitigate potential fault rupture, seismic ground shaking, ground failure, and liquefaction hazards identified under Impacts GEO-1 and GEO-2.

- **Fault Rupture:** Future geologic investigations to evaluate the location and relative activity of potentially active fault splays at the project site and the feasibility of locating future site improvements will be conducted by geologic consultants prior to design of structure locations. Fault investigations will be conducted by a California State Certified Engineering Geologist and reviewed by the CGS. Appropriate building setback zones will be established in locations deemed not feasible for construction of occupied structures.

- **Seismic Ground Shaking:** Structural elements of future improvements will be designed to resist or accommodate appropriate site-specific ground motions and conform to the current seismic design standards, including those set forth by the 2013 California Building Code (CBC) and the County of Los Angeles building regulations.

- **Ground Failure:** Assessment of liquefaction potential at the project site will be evaluated by subsurface geotechnical exploration prior to detailed design and construction of project improvements and will be incorporated into the design, as appropriate. Structural design will be developed to reduce the potential impacts of liquefaction, including the incorporation of techniques such as structural design, in-situ ground modification, or supporting foundations with piles at depths designed specifically for seismically induced settlement.

- **Landslides:** A detailed assessment of the landslide and mudflow potential in areas of project improvements will be performed prior to design and construction of improvements and incorporated into the design, as appropriate. Methods for construction in areas with a potential liquefaction hazard may include excavation of potentially unstable material for a

more stable slope configuration; reduction of landslide driving forces by removal of earth materials at the top of the landslide; construction of a buttress and/or stabilization fills; construction of retailing walls, installation of rock bolts on the face of the slope, or installation of protective wire mesh on the slope face; the construction of debris impact walls at the toe of the slope to contain rock fall debris; and/or supporting foundations with piles at depths designed specifically for seismically induced settlement. Graded slopes created for future project site developments will also be designed to reduce the potential for landslides or mudflows.

The geotechnical evaluation will 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 adjacent improvements and provide access for construction. All recommendations included in the preliminary geotechnical evaluation pertaining to groundwater will be followed. Onsite infiltration of storm water related to Low Impact Development guidelines will be evaluated during the detailed design phase of the project. Further study, including subsurface exploration, will also be performed during the detailed design phase of planned improvements to evaluate the presence of seepage and/or perched groundwater, and to evaluate the potential for stormwater infiltration at the site, and the potential impacts on design and construction of project improvements. Techniques such as casing, shoring, and/or construction dewatering will be incorporated.

- **Collapsible Soils/Settlement:** Assessment of soil settlement will be performed prior to detailed design and construction or project improvements and techniques will be developed, as appropriate, to reduce impacts related to settlement. Surface reconnaissance and subsurface evaluation will be performed. Site-specific geotechnical evaluations will also be performed to assess the settlement potential of onsite natural soils and undocumented fill, which may include drilling of exploratory borings or test pits and laboratory testing of soils, where appropriate, to evaluate site conditions.

Examples of possible mitigation measures for soils with the potential for settlement could include 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 of new fills, and specialized foundation design, including the use of deep foundation systems to support structures. Various in-situ soil improvement techniques are also available, such as dynamic compaction (heaving tamping) or compaction grouting.

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

- **Expansive Soils:** Assessment of the potential for expansive soils will be performed during the design phase of the project through subsurface exploration and mitigation techniques such as over-excavation and replacement with non-expansive soils, soil treatment, moisture management, and/or specific structural design for expansive soil conditions will be developed, as appropriate, to reduce impacts to expansive soils.

MM-GEO-C2: A Storm Water Pollution Prevention Program incorporating BMPs for erosion control will be prepared prior to the start of construction in accordance with governing agencies. Long-term erosion management practices and drainage provisions will also be incorporated into the design and maintenance of the project following development of site improvements. BMPs may include surface drainage measures for erosion due to water, such as the use of erosion prevention mats or geofabrics, silt fencing, sandbags and plastic sheeting, and temporary drainage devices. Positive surface drainage will be accommodated at project construction sites to allow surface runoff to flow away from site improvements or areas susceptible to erosion. Wetting of soil surfaces and/or covering exposed ground areas and soil stockpiles will also be considered during construction operations, as appropriate, to reduce wind-related erosion (see air quality impacts and mitigation measures). Project design will address reducing concentrated run-off conditions that could cause erosion and affect the stability of the project.

Paleontological Resources

Tiers I and II

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

MM-GEO-C3: Due to the moderate paleontological potential of the Pacoima Formation, monitoring will be conducted during all earthmoving activities that affect native sediments to reduce potential impacts to a less-than-significant level. Excavations will be monitored on a by a qualified paleontological monitor under the supervision of a qualified paleontologist.

Additionally, when initial excavation exceeds depths of 5 feet into areas mapped as Quaternary alluvium, periodic paleontological spot checks should be conducted to determine if older, paleontologically sensitive sediments are present. If present, full-time monitoring will be implemented.

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 will 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 will have the 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 will be made. To prevent construction delays, paleontological monitors will be equipped with the necessary tools for the rapid removal of fossils and retrieval of associated data, including 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 will be used to record pertinent geologic data, stratigraphic sections will be measured, and appropriate sediment samples will be collected and submitted for analysis.

Fossils collected, if any, will be transported to a paleontological laboratory for processing where they will 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 will 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, will signify completion of the program to mitigate impacts on paleontological resources.

3.4.3 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

3.4.4 Rationale

Tiers I and II

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 **MM-GEO-C1** and **MM-GEO-C2** would ensure that the proposed project is designed and constructed in accordance with appropriate seismic protections prescribed for the site's specific geotechnical characteristics. Furthermore, implementation of mitigation measure **MM-GEO-C3** would reduce impacts on paleontological resources for Tiers I and II, if any are found, to a level of less than significant.

Cumulative Impacts

With respect to cumulative soil erosion impacts, projects requiring grading of more than 1 acre would be required to apply for a National Pollutant Discharge Elimination System permit and implement an SWPPP that incorporates BMPs for erosion control. Development on the medical center campus under the Master Plan would be subject to permit requirements and the specific measures identified in **MM-GEO-2.** With respect to cumulative subsidence impacts, the proposed project would not require groundwater, oil, or gas withdrawals from local sources, and therefore would not contribute to any potential subsidence impacts. With respect to unstable soil impacts, none of the 14 related projects shown in Table 2-2 of Chapter 2, *Project Description,* are located adjacent or in very close proximity to the campus. The nearest related

project is located 0.5 miles from the campus at 13530 Glenoaks Boulevard; therefore, none of the related projects would contribute to cumulative slope stability impacts in the immediate vicinity of the campus. However, multiple projects could be developed within the campus under the Master Plan over time, and some of those projects may be constructed simultaneously and in close proximity to each other. The measures identified in **MM-GEO-C1** would minimize landslide hazards; therefore, development on the campus is not expected to result in cumulatively considerable contribution to significant cumulative landslide hazard impacts on or in the immediate vicinity of the campus.

Cumulative impacts associated with geology and soils would be less than significant with implementation of the above listed mitigation measures.

3.4.5 References

Section 3.6 of the EIR addresses the project's geologic/soils and paleontological resources impacts.

3.5 Greenhouse Gas Emissions

3.5.1 Description of Potential Effects (Appendix G, Checklist Question, VIII,a)

Tiers I and II

Construction of the proposed project would generate emissions of CO2, CH4, and N2O associated with mobile and stationary construction equipment exhaust as well as employee and haul truck vehicle exhaust, which would contribute to cumulatively significant GHG impacts for Tiers I and II and would therefore be a significant impact.

Operation of the proposed project would generate long-term emissions of CO2, CH4, and N2O associated with area sources, energy consumption, motor vehicles, waste generation, and water consumption, which would contribute to cumulatively significant GHG impacts for Tiers I and II and would therefore be a significant impact.

Cumulative Impacts

As stated above, construction and operation of the proposed project would contribute to cumulatively significant GHG impacts. Due to the lack of a details regarding buildout long-term, the proposed project's incremental contribution to cumulative impacts related to GHG emissions and reduction targets and plans would be cumulatively considerable.

3.5.2 Mitigation Measures

Tiers I and II

MM-GHG-C1: The County (or its contractors) will implement the following diesel emission-reduction measures during project construction:

- All equipment and delivery truck idling times will be limited by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. Clear signage will be installed at all delivery driveways and loading areas regarding the limitation on idling time.
- All construction equipment will be maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction activities using diesel-powered vehicles or equipment, the County's construction contractors will verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into the project site. A report by the certified mechanic of the condition of the construction and operations vehicles and equipment will be submitted to the County prior to their use.
- Alternative-fuel (e.g., biodiesel, electric, compressed natural gas) construction vehicles/equipment (comprising at least 15 percent of the fleet) will be used, to the extent feasible.
- Renewable diesel fuel will be used for all diesel-powered heavy construction equipment and on-road vehicles to the extent that it is readily available from a local supplier in the Southern California region.
- Local building materials (at least 10 percent) and recycled products, including cement and concrete made with recycled products, will be used, to the extent feasible.
- A construction waste management plan will be implemented to divert landfilled waste by requiring the recycling of a minimum of 65 percent of all non-hazardous construction waste.

MM-GHG-O1: The County will implement the following GHG reduction measures for all new development within the campus:

- The County (or its contractors) will implement the following water conservation measures, which are in addition to those required by codes and ordinances:
    - Install public bathroom faucet aerators (non-residential & residential over 6 stories) with a flow rate of 0.4 gallons per minute (gpm),
    - Install cooling tower conductivity controllers or cooling tower pH conductivity controllers,
    - Install rotating sprinkler nozzles for landscape irrigation 0.5 to 1.0 gpm,
    - Install drip/subsurface irrigation (i.e., micro-irrigation),
    - Implement proper hydro-zoning (i.e., groups plants with similar water requirements together),
    - Install zoned irrigation,
    - Contour landscaping to minimize precipitation runoff,
    - Install drought tolerant plants in 50 percent of total new landscaping,
    - Install water conserving turf in 100 percent of new turf added to landscaping, and

  - Use recycled water for stationary equipment that requires water cooling, to the extent feasible.

- Install a stormwater retention and filtration system.
- Pursue a net zero water building design for new campus buildings, to the extent feasible.
- Develop a recycled water strategy and implementation plan that increases the campus's use of alternative water sources, such as rainwater, greywater, stormwater, and recycled water.
- Achieve a minimum solid waste diversion rate of 85 percent by 2035 by implementing measures including, but not necessarily limited, to:
  - Installing a food waste diversion program at the campus.
  - Installing an onsite recycling program at the campus.
- Incentivize the use of recycled materials in new and renovated campus buildings.
- Prioritize the use of food vendors with certifications for sustainable agricultural practices related to water and energy use, to the extent feasible.
- Provide plant-based menu options at new and existing campus food facilities, to the extent feasible.
- Pursue zero waste certification requirements for the campus, to the extent feasible.
- Install Energy Star-rated appliances.
- Install electric-only appliances and HVAC (e.g., no natural gas heating or cooling) systems, to the extent feasible. Where natural gas appliances need to be installed, these appliances will meet high-efficiency standards.
- Establish an energy and water use data collection program to benchmark and report energy and water use at the campus, demonstrating an increase in energy and water efficiency over the lifetime of the project.
- Implement travel demand reduction measures (TDM) for employees, including, but not necessarily limited to measures such as:
  - Providing bicycle parking for at least 5 percent of full-time-equivalent campus employees.
  - Providing preferential carpool spaces within proposed parking structures on the campus.
- Dedicate 5 percent of new parking spaces for clean-air vehicles and equip those spaces with electric vehicle charging equipment.
- Purchase new zero-emission passenger vehicles for use by the campus.
- Install a high-efficiency lighting system that takes advantage of natural daylighting, augmented by daylighting controls and occupancy sensors that turn off the lights in unoccupied spaces.

- Maximize the installation of solar systems on new and renovated buildings to the extent these systems are cost-effective.
- Install, in proposed new buildings containing more than 10,000 gsf of space, high-performance glazing with a low solar heat gain coefficient value that reduces the amount of solar heat allowed into the building, without compromising natural illumination.
- Install cool roofs with an R value (i.e., the measurement of the effectiveness of thermal insulating materials) of 30 or better on proposed new buildings, to the extent feasible.
- Implement a net zero carbon building design for all new building developments and building renovations at the campus, to the extent feasible.
- Develop an urban heat island mitigation strategy and implementation plan to guide all future development of the campus.
- Increase urban tree canopy cover to provide shade to a minimum of 40 percent of the length of sidewalks on all campus streets.
- Use electric powered landscaping equipment, rather than fossil-fuel powered landscaping equipment, to the extent feasible.
- Focus selection on native plants and trees to provide new, water-wise landscaping that blends the campus with the ecology of the surrounding natural environment.
- Provide ongoing sustainability education and training for campus employees.

3.5.3 Findings

For the above greenhouse gas emissions impacts, 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 greenhouse gas impacts due to the proposed project are found to be.

☒ Significant ☐ Not Significant

3.5.4 Rationale

Tiers I and II

Impacts associated with greenhouse gas emissions would be reduced with implementation of the above listed mitigation measures; however, impacts may still be significant after mitigation.

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.

Cumulative Impacts

Due to the lack of a details regarding buildout long-term, it cannot be stated with certainty that the proposed project would result in emissions that would represent a fair share of the requisite reductions to achieve statewide reduction targets. The proposed project's incremental contribution to cumulative impacts related to GHG emissions and reduction targets and plans would be cumulatively considerable.

3.5.5 References

Section 3.7 of the EIR addresses the project's greenhouse gas emissions impacts.

3.6 Hazards and Hazardous Materials

3.6.1 Description of Potential Effects (Appendix G, Checklist Questions IX,b,d)

Tiers I and II

During the construction period for Tiers I and II, routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and fuels would occur. Such transport, use, and disposal must be compliant with applicable regulations and with construction BMPs implemented in accordance with a site specific SWPPP required as part of the NPDES General Construction Permit.

For both tiers, 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.

The old Los Angeles County Fire Station #04, located within the proposed project footprint, was listed on the LUST database with contaminated soil, which was identified as a Potential Environmental Concern (PEC). The old fire station was decommissioned shortly after 1995, but is currently used for hazardous materials management purposes and office space. The presence of USTs in the hospital loading lock and the presence of a paint and solvent spray booth were also identified as PECs. Demolition of structures built prior to 1980 may result in the exposure of the public and/or the environment to lead based paint (LBP) and/or asbestos containing materials (ACMs) in buildings.

3.6.2 Mitigation Measures

Tiers I and II

MM-HAZ-1: Encountering Contaminated Soils. If odiferous, stained, or discolored soil is encountered near the fire station, USTs, or spray booth a professional environmental consultant specializing in the identification and handling of hazardous materials will be retained by the County to assess the site. Identification of possible hazardous materials would typically involve soil samples and laboratory analysis. The suspect soil will be isolated, covered, and avoided by construction personnel until analytical results are reviewed by qualified personnel. Soils identified as hazardous or contaminated will be handled, transported, and treated in accordance with all federal, state, and local existing hazardous materials regulations (as mentioned under Section 3.7.2, Regulatory Setting, of this EIR) and based on the professional environmental consultant's recommendations. Only when the site has been released by the professional environmental consultant and the applicable oversight agencies (such as the Los Angeles County Fire Department's Health Hazardous Materials Division) will construction activities be allowed to continue on the affected site.

MM-HAZ-2: Engineering Controls and Best Management Practices During Construction. To minimize human exposure to potentially contaminated soils during construction, contractors will employ the use of engineering controls and BMPs. Engineering controls and construction BMPs will include, but are not limited to, the following.

- Contractor employees working on site handling potentially contaminated media will be certified in the Occupational Health and Safety Administration's 40-hour Hazardous Waste Operations and Emergency Response training.
- Contractors will water or mist soil as it is being excavated and stockpiled or loaded onto transportation trucks.
- Contractors will place any stockpiled soil in areas shielded from prevailing winds or cover stockpiles with staked and/or anchored sheeting.

MM-HAZ-3: Encountering Asbestos-Containing Materials and Lead Based Paint. In order to minimize exposure, prior to demolition activities, a Hazardous Building Materials Survey (HBMS) and evaluations for asbestos-containing materials and lead-based paint will be conducted in buildings that are to be demolished or renovated. Abatement measures will be implemented in accordance with the recommendations of these evaluations. Asbestos surveys will 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 will 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-4: Project-Level Hazardous Materials Sites Assessment Prior to Construction Activities. To avoid exposure of construction workers, the public, or the environment to contaminated media, prior to any ground-disturbing activities, contractors will be required to retain a professional environmental consultant specializing in hazardous materials impact assessment to conduct a project-level analysis to determine if there are existing hazardous materials conditions in the vicinity of the construction site and potential for existing hazardous

materials conditions to affect construction. This assessment will consist of a search for environmental-related information present in publicly accessible databases. The information will be reviewed to determine if the construction footprint or adjacent properties are listed in the databases. If the construction footprint or adjacent properties are listed in the databases, the professional environmental consultant will determine the potential risk to construction workers, the public, or the environment from rehabilitation activities and identify all necessary avoidance, abatement, remediation, cleanup, disposal, monitoring, reporting, notifications, and/or other measures to prevent significant impacts. The contractor will implement all measures as directed by the professional environmental consultant.

3.6.3 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

3.6.4 Rationale

Tiers I and II

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 would ensure that, if encountered, these hazardous materials are handled appropriately to minimize the risk of exposure to construction workers and the general population. Furthermore, mitigation measures **MM-PS-1** and **MM-TRAF-1** would mitigate impacts during construction on emergency vehicle access and response times.

3.6.5 References

Section 3.8 of the EIR addresses the project's hazardous waste and materials impacts.

3.7 Noise

3.7.1 Description of Potential Effects (Appendix G, Checklist Questions XIII,a,b)

Tiers I and II

Noise from construction activities could exceed established thresholds and adversely affect noise-sensitive uses residential uses in the vicinity of the campus for Tiers I and II. Heavy construction equipment has the potential to produce groundborne vibration levels that are perceptible to people in the surrounding area. Estimated groundborne vibration levels due to construction of Master Plan facilities could exceed established thresholds at offsite sensitive residential uses. If pile driving occurs during construction, the number of offsite noise-sensitive uses adversely affected by construction activities would increase.

Project operational noise sources for Tiers I and II would include traffic on the surrounding streets and onsite noise sources such as mechanical equipment, parking lot activities, deliveries, and activities at proposed outdoor spaces such as trails and gardens. Because the final type, location, and configuration of mechanical equipment is unknown, the possibility exists that some onsite mechanical equipment would increase ambient noise levels and exceed the applicable noise standards at offsite sensitive receptors, a potentially significant impact.

3.7.2 Mitigation Measures

MM-NOI-C1: Reduce Construction Noise to the Extent Possible. The County will implement the following noise reduction measures during construction:

- Construction activities will be limited to between the hours of 7:00 a.m. to 7:00 p.m. on Monday through Friday or 8 a.m. to 6 p.m. on Saturdays, and will not occur at any time on Sundays or legal holidays. Construction personnel will not be permitted on the job site, and material or equipment deliveries and collections will not be permitted outside of these hours.
- To the fullest extent practicable, the quietest available type of construction equipment will be used. Newer equipment is generally quieter than older equipment. The use of electric powered equipment typically is quieter than diesel or gasoline powered equipment, and hydraulic powered equipment typically is quieter than pneumatic power.
- Where possible, impact pile driving will be replaced with other piling techniques, such as vibratory pile driving, or vibration–and percussive-free methods (examples include hydraulic press-in piles or cast-in-drilled-hole 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 will comply with such regulation while in the course of project activity.
- All construction equipment will be properly maintained. Poor maintenance of equipment can cause excessive noise levels.
- All construction equipment, stationary and mobile, will 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) will be equipped with shrouds and noise-control features that are readily available for that type of equipment.

- All noisy equipment will be operated only when necessary and will be switched off when not in use.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, will be for safety warning purposes only. To the extent practicable, temporary barriers will be employed around the project site and/or around noisy construction equipment. For barriers to be effective they will 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 (i.e., the sound absorptive faces of the panels will face the construction equipment).
    - From common construction materials such as plywood and lined with sound absorptive material (i.e., the sound absorptive material will face the construction equipment).
    - From acoustical blankets hung over or from a supporting frame. The blankets will provide a minimum sound transmission class (STC) rating of 28 and a minimum noise reduction coefficient (NRC) of 0.80 and will be firmly secured to the framework with the sound absorptive side of the blankets oriented toward the construction equipment. The blankets will be overlapped by at least 6 inches at seams and taped so that no gaps exist. The largest blankets available will be used in order to minimize the number of seams. The blankets will be draped to the ground to eliminate any gaps at the base of the barrier.
- Construction contractors will ensure that construction employees are trained in the proper operation and use of the equipment.
- Storage, staging, parking, and maintenance areas will be located away from sensitive receptors. Where this is not possible, the storage of waste materials, earth, and other supplies will 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, will be positioned as far away as possible from noise-sensitive areas.
- Construction equipment will 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-O1: 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, 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 will retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to ensure that the mechanical equipment complies with Chapter XI of the city of Los Angeles Municipal Code. Such recommendations may include, but are not limited to: changes in equipment locations, upgrades to central plant buildings, rooftop parapet walls, acoustical louvers or screens, or intake and exhaust silencers.

MM-NOI-C2: Reduce Construction-Generated Groundborne Vibration to the Extent Possible. The County will implement the following vibration reduction measures during construction:
Where possible, impact pile driving will be replaced with other piling techniques, such as vibratory pile driving or, preferably, vibration–and percussive-free methods (examples include hydraulic press-in piles or cast-in-drilled-hole piles).
To the extent possible, heavy construction equipment will not be operated within 140 feet of onsite or offsite sensitive receptors.

3.7.3 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

3.7.4 Rationale

Tiers I and II

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, it may still result in unavoidable significant construction noise and vibration impacts. Additionally, Alternative B would not redevelop the campus to the same extent as could occur under the Master Plan and consequently, campus improvements including landscaping, pedestrian and equestrian trails, and infrastructure improvements may be more limited than would occur under the proposed Master Plan.

3.7.5 References

Section 3.11 of the EIR addresses the project's noise impacts.

3.8 Public Services

3.8.1 Description of Potential Effects (Appendix G, Checklist Question XV, a)

Tiers I and II

Emergency access to the project site could be affected by Master Plan construction activities. Temporary lane closures and construction related-traffic could delay or obstruct the movement of emergency vehicles, a potentially significant impact.

3.8.2 Mitigation Measures

Tiers I and II

The following measures are proposed to mitigate the construction impacts described in Impact PS-1.

MM-PS-1: The Los Angeles County project manager and construction contractor will 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.

MM-PS-2: The Los Angeles County project manager and construction contractor will continue to coordinate with LASD on project design and development under the Master Plan, to ensure LASD is able to plan and staff adequate resources to continue to serve the campus for police protection services.

3.8.3 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

3.8.4 Rationale

Tiers I and II

Mitigation measures will be implemented to ensure adequate emergency access is maintained during construction activities. As described in Chapter 3.13, MM-PS-1would reduce construction impacts to emergency services to less-than-significant levels.

3.8.5 References

Section 3.13 of the EIR addresses the project's public services impacts.

3.9 Transportation and Traffic

3.9.1 Description of Potential Effects (Appendix G, Checklist Question XVII,a,d)

Tiers I and II

Construction could require temporary road or lane closures that could affect emergency vehicle access, a potentially significant impact.

Tier II

The increase in the number of project trips associated with full buildout of Tier II development and the expected increase in the number of ambient trips beyond 2035 could lead to impacts at some intersections in the vicinity. Estimated trip generation at full buildout of the Master Plan would be approximately 190 percent to 280 percent higher than that of Tier I development in each of the analyzed peak hours. Based on projected cumulative-plus-project LOS and applicable threshold criteria, the increased traffic with full development could potentially result in significant impacts at two study intersections: Polk Street and the I-210 eastbound ramps (Intersection 13) and Polk Street and Foothill Boulevard (Intersection 14). Overall, the level of the project-related increase in traffic at the other analyzed intersections would be higher than it would be with Tier I development only. Other locations could also be significantly affected.

Tier II development could also result in significant traffic impacts on freeway mainline segments and freeway ramp queues.

Cumulative Impacts

The projected cumulative-plus-project conditions presented in Section 3.15 *Traffic/Transportation*, of the EIR depict the impacts of traffic generated by cumulative development and related projects combined with project-generated traffic in 2035 on the study area intersections. Under existing conditions, none of the study intersections would operate at LOS E or F; however, three intersections would operate at an unacceptable LOS of E or F in the a.m. or p.m. peak hour under cumulative-plus-project conditions. Therefore, the proposed Tier I development and cumulative development would result in significant cumulative traffic impacts.

In addition, traffic from the proposed Tier I development, related projects, and other cumulative development could also result in significant cumulative impacts on freeway mainline segments and freeway ramps. Similarly, Tier II development could also contribute to significant cumulative traffic impacts.

3.9.2 Mitigation Measures

Tiers I and II

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.

3.9.3 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

3.9.4 Rationale

Tiers I and II

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

Tier II

The traffic generated by Tier II development could result in significant traffic impacts at study intersections. However, the level of service and operational traffic impacts of Tier II development at the study intersections in the project area were not quantified because development would occur far in the future, beyond 2035, and it would, therefore, be speculative to determine the extent of potential impacts on the local and regional transportation system and whether any feasible mitigation measures could be implemented to reduce potential impacts. Additionally, as stated in the EIR, when individual projects under Tier II of the Master Plan are proposed, additional environmental analysis and documentation would be required, in compliance with CEQA regulations, to determine the significance of Tier II project impacts and identify measures to mitigate any significant impacts. If that future analysis determines that there are significant impacts to the City of Los Angeles street system and feasible measures are identified to mitigate those impacts, then those mitigation measures would be need to approved by the City and their implementation would be the responsibility of the City.

Cumulative Impacts

Proposed mitigation measures would reduce transportation/traffic impacts, however the proposed Tier I development and cumulative development would result in significant cumulative traffic impacts. In addition, traffic from the proposed Tier I development, related projects, and other cumulative development could also result in significant cumulative impacts on freeway mainline segments and freeway ramps.

3.9.5 References

Section 3.15 of the EIR addresses the project's transportation and traffic impacts. Chapter 5 of the EIR discusses the alternatives to the proposed project.

3.10 Tribal Cultural Resources (Appendix G, Checklist Question, XVIII,a,b)

3.10.1 Description of Potential Effects

In consultation with Fernandeño/Tataviam Band of Mission Indians pursuant to AB 52, the Fernandeño have provided detailed information about three TCRs, including two villages in the vicinity of the campus. While the proposed project is not directly located within the village habitation areas, it is within the use area for each village, which extends 3 miles from the village center. In addition, the proposed project's location near natural springs, California oak woodland, and known traditional and historic trails indicates a moderate sensitivity for subsurface TCRs. The proposed project has a moderate potential to affect TCRs in areas on the campus not previously disturbed. If TCRs are encountered and disturbed during construction, the impact would be significant under CEQA.

Cumulative Impacts

The project and the related projects are located within a semi-urbanized area that has been disturbed and developed over time. Cumulative growth and development in the cumulative impacts study areas could result in significant impacts if tribal cultural resources (TCRs) are encountered and disturbed or damaged during construction activities. Additionally, although the potential for an individual cumulative project to affect TCRs is unknown, given the geographic extent of the cumulative impacts study areas, it is probable that cumulative growth and development would have impacts on TCRs.

3.10.2 Mitigation Measures

CR-1 through **CR-6**, as presented in Section 3.4, *Cultural Resources*, would mitigate or reduce potential impacts to TCRs, archaeological resources, and human remains, respectively, to a level that is less than significant.

3.10.3 Findings

For the above impacts to tribal 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 tribal cultural resources from the operation of the project are found to be.

☐ Significant ☒ Not Significant

3.10.4 Rationale

Tiers I and II

Mitigation measure will be implemented to reduce potential impacts to TCRs, archaeological resources, and human remains, respectively, to a level that is less than significant

Cumulative Impacts

While project excavation activities has the potential to affect unknown TCRs, compliance with applicable regulatory requirements and the City's standard condition of approval in the event of inadvertent discovery would ensure that the cumulative impacts to tribal cultural resources would be reduced. In addition, related projects would be required to comply with the consultation requirements of AB 52 to determine and mitigate any potential impacts to tribal cultural resources. Therefore, cumulative impacts to tribal cultural resources would be less than significant and would not be cumulatively considered.

3.10.5 References

Section 3.16 of the EIR addresses the project's tribal cultural resources impacts. Chapter 5 of the EIR discusses the proposed project alternatives.

3.11 Utilities/ Service Systems

3.11.1 Description of Potential Effects

Tiers I and II

During construction of individual projects implemented under the Master Plan, water would be used by construction workers and activities, e.g., cement mixing and dust suppression, wastewater would be generated by construction workers, and electricity and fuels would be consumed. Construction of new development and facilities under Tier I would require new on-campus infrastructure to accommodate that development, including new water or sewer lines to new on-campus buildings. If construction of new water lines occurs at depths where undisturbed native soils would be encountered, the potential exists that unknown buried archaeological or paleontological resources could be encountered and damaged or destroyed.

Implementation of the Master Plan could result in a net increase of 173,382 gpd of wastewater during operation. The City of Los Angeles Bureau of Sanitation (BOS) has concluded the sewer

system might be able to accommodate the total flow for the proposed project, but that further detail gauging and evaluation may be needed as part of the permit process for individual projects to identify a specific sewer connection point. A final approval for sewer capacity and connection permit shall be made at that time. If BOS determines that there is insufficient capacity in the local sewer lines that would serve an individual future project, then the impact would be considered to be significant.

Tier II

The construction and operation of proposed Master Plan facilities would increase the consumption of utilities. Future water supplies, based on a Water Supply Assessment prepared for the proposed project, are expected to be adequate and can accommodate future demand under the Master Plan. However, the increase in water supply consumption for projects that could be developed far into the future under Tier II of the Master Plan is not accounted for in the Urban Water Management Plan projections, which end in 2040. When future projects (i.e., Tier II development projects that would occur beyond the year 2040), are proposed and building plans are developed, LACDPW will be required to coordinate with the water provider, LADWP, to confirm that adequate water supplies exist to serve these future Master Plan projects. If it's determined the water supplies are insufficient, the impact would be significant.

Cumulative Impacts

The cumulative increases in regional and local study area populations would increase the demand for utilities services. Because the service areas for the various utility providers (water, sewer and wastewater, stormwater, solid waste, natural gas, and electricity) varies widely, and, in some cases, covers large geographic areas (e.g., SoCalGas or LADWP), it is possible that increased demand due to future cumulative development within the service areas could require additional utility capacity and supplies to meet projected future demand and maintain adequate levels of service, notwithstanding future savings resulting from increased energy efficiencies.

3.11.2 Mitigation Measures

Tiers I and II

MM-UTL-1: 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 will 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 will be required to build a sewer line to a point in the sewer system with sufficient capacity.

Also see the mitigation measures identified above for archaeological and paleontological resources.

Tier II

MM-UTL-2: In conjunction with preparation of a subsequent CEQA environmental document for any future individual development project under the Master Plan that is proposed in the year 2040 or beyond that is defined as a "water-demand project" in Section 15155 of the CEQA

Guidelines, the County will 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 will request that LADWP prepare a water assessment for the proposed project. The County will 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.

3.11.3 Findings

For the above impacts to utilities/service systems, 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 utilities from the operation of the project are found to be.

☒ Significant ☐ Not Significant

3.11.4 Rationale

Tiers I and II

Since the County cannot compel another public entity that has jurisdiction over the services, in this case BOS for wastewater/sewer impacts, to conduct further gauging and evaluation to determine whether local sewer lines have sufficient capacity to accommodate future wastewater flows, for the purposes of this EIR, the impacts on local sewer lines are considered to be significant and unavoidable.

While Alternative B analyzed in the EIR would result in less development and therefore less wastewater than the proposed project, it may still generate wastewater flows that exceed the capacity of local sewer lines, and given local sewer lines are under the jurisdiction and are the responsibility of BOS, impacts are considered to be potentially unavoidable and significant.

Tier II

If it's determined that future water supplies for Master Plan projects far in the future (beyond year 2040) 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.

While Alternative B analyzed in the EIR would result in less development and therefore less wastewater than the proposed project, it may still generate wastewater flows that exceed the

capacity of local sewer lines, and given local sewer lines are under the jurisdiction and are the responsibility of BOS, impacts are considered to be potentially unavoidable and significant.

Cumulative Impacts

Although mitigation measures identified above would reduce potential construction and operational utilities impacts, because the planning horizon for the Master Plan extends well into the future (beyond year 2040), it is possible that yet unidentified improvements to the regional providers utility infrastructure may also be required over the life of the Master Plan. Therefore, it is anticipated that the proposed project and other regional development would result in significant cumulative impacts on utilities and energy.

3.11.5 References

Section 3.17 of the EIR addresses the project's utilities impacts. Chapter 5 of the EIR discusses the proposed project alternatives.

3.12 Wildfire Hazards

3.12.1 Description of Potential Effects

Cumulative Impacts

Growth and development in the cumulative impacts study areas could result in significant impacts to wildfire hazards if cumulative impacts substantially impair an adopted emergency response plan or emergency evacuation plan.

3.12.2 Mitigation Measures

The following measure is proposed to mitigate wildfire hazards:

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

3.12.3 Findings

For the above impacts to wildfire hazards, 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

3.12.4 Rationale

Cumulative impacts associated with wildfire hazards would be less than significant with implementation of the above listed mitigation measure.

3.12.5 References

Section 3.18 of the EIR addresses the project's wildfire hazards impacts. Chapter 5 of the EIR discusses the proposed project alternatives.

4 Alternative 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 describes the impacts of the Alternative A - No Project Alternative (No-Build and Limited Development scenarios), which is required by CEQA, and Alternative B – Reduced Development. Chapter 5 also discusses four alternatives that were eliminated from detailed consideration in the EIR.

4.1 Alternatives Considered but Not Analyzed in the EIR

Alternatives that were considered but not carried forward in the EIR include the Boulevard Site Plan Option, Compact Site Plan Option, Terrace Site Plan Option, and Wilson Canyon Site Plan Option. These alternatives were not carried forward into the EIR because they would not avoid or substantially lessen the proposed Master Plan's significant impacts. It was also determined by the County that the proposed Master Plan would best meet the objectives of the Master Plan, the community, and the County's needs and would result in fewer impacts to the environment and the community, in comparison to these other alternatives. 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

Alternative A – No Project and No Project/Limited Development

For the purposes of this EIR, two No-Project scenarios were defined. Under both scenarios, the Master Plan would not be implemented. However, the first scenario, No Project/No Build, assumes that no new development would occur on the campus other than those projects already approved and, consequently, that environmental conditions on the Olive View–UCLA Medical Center Campus would remain largely unchanged. Although this No Project scenario would result in no or few adverse impacts, it would not provide new and upgraded Olive View–UCLA Medical Center Campus facilities, improved wayfinding, better access/circulation, and open space for visitors, employees, and area residents to the extent or in the manner that could occur under the proposed Master Plan. Therefore, this No Project scenario would not meet any of the Master Plan project objectives.

The second No Project scenario considers what is more likely and could reasonably occur in the future if the proposed Master Plan is not approved: individual projects would be proposed, approved, and then implemented on an ad hoc basis similar to how development has occurred on the campus in the past. As a consequence, development on the campus under this scenario would be greater than the No Project/No Build scenario, but more limited in scope and extent than the development that could occur under the proposed Master Plan or Reduced Development Alternative (Alternative B, below). Given those assumptions, it is likely this No Project scenario would not result in the unavoidable significant adverse impacts that would occur under the Master Plan. Although some changes and impacts to the environment (e.g., construction, noise, and air quality impacts, impacts to archaeological and paleontological resources) could occur under this scenario that may not occur under the No Project/No Build scenario, the scope and extent of the impacts would still likely be substantially less than what could occur with implementation of the proposed Master Plan. However, the No Project/Limited Development Alternative would not provide the benefits to the community that could occur under the proposed Master Plan, nor would it provide a framework to guide development on the campus in a comprehensive and coordinated manner to meet the Olive View–UCLA Medical Center's and County's needs. None or few 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:

There would be a reduction in size of the administrative services building. This component of the proposed Master Plan would be reduced in size from the 96,000-square-foot facility under the Master Plan to approximately 38,600 square feet. The reduction in the size of this building could be achieved by relocating several offices or departments that would be located in this building under the proposed Master Plan to other existing or proposed new buildings.

Alternative B would consolidate the East and West Central Utility Plants. Under this alternative, one large consolidated central utility plant would be constructed in place of the two proposed under the Master Plan (Central Utility Plant East under Tier I and Central Utility Plant West under Tier II). This consolidated central utility plant would also contain materials management/supply services operations eliminating the need for the separate 68,100-square-foot building proposed under Tier I of the Master Plan.

Alternative B would eliminate the new Materials Management/Supply Services Building. The new 68,100-square-foot Materials Management/Supply Services Building under the proposed Master Plan would be eliminated under this alternative, and instead materials management functions would be co-located with and share large delivery truck tarmac and dock facilities with the consolidated central plant.

Other projects proposed under Tier I, including the Restorative Care Village, Ambulatory Care Center, existing inpatient hospital, and Community Center would be similar to those under the proposed Master Plan. This alternative would also include other Tier I improvements proposed under the Master Plan, including new community open space and landscaping, parking, vehicular circulation, and pedestrian circulation improvements, and utility infrastructure improvements.

Changes in Tier II under Alternative B include constructing a new hospital and repurposing the existing hospital building for other uses defined under the proposed Master Plan, providing an opportunity to use the existing hospital to accommodate several proposed Tier II facilities, rather than constructing new buildings in the western half of the campus, as would occur under the proposed Master Plan. These facilities would include the Long Term Care facility, UCLA medical office and research and development buildings, child care center, fitness center, and retail uses. Accommodating these facilities and uses in the repurposed existing hospital would reduce the Tier II building square footage by approximately 315,000 square feet. Other Tier II Master Plan improvements, including new community open space and landscaping, parking, vehicular circulation, and pedestrian circulation improvements, and utility infrastructure improvements on the western half of the campus would also be implemented under this alternative, but potentially to a lesser extent than would occur under the proposed Master Plan.

4.3 Proposed Project

The proposed project is intended to guide development of the campus over a period of more than 20 years, including the expansion of health care delivery services and health related community programs. The Master Plan provides alternate paths for that development and flexibility to allow the Master Plan to adapt to changes over time. The Master Plan also includes an analysis and assessment of existing campus infrastructure and buildings, future considerations and recommendations for the campus's land use, and a series of design criteria that guide building placement, form, and materials.

For the purposes of the EIR, two tiers of development have been defined and analyzed. Tier I entails near-term projects that are better defined and could be constructed subject to securing the necessary approvals and funding, as well as other subsequent development that could occur over the next 17 years, through the year 2035. Tier I development, which is described in greater detail below, could include the Restorative Care Village, which is composed of the Recuperative Care Center, Residential Treatment Program facility, Mental Health Wellness Center, and the new Mental Health Urgent Care Center, as well as the Ambulatory Care Center, Community Center,

improvements to the existing hospital, new parking facilities, and other campus improvements that would be located predominantly in the eastern half of the current campus. Tier II development would occur beyond 2035 and could include the construction of a new inpatient hospital, Long-Term Care facility, support services building, retail space, County department buildings, and the renovation and reuse of the existing inpatient hospital for other purposes. If build-out of the campus occurs as envisioned under the Master Plan, the net increase in building square footage would be approximately 1.3 million square feet, which would occur throughout the campus.

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 B would reduce the impacts during construction to air quality, greenhouse gas emissions, noise, and traffic, as it would reduce development on the campus. However, similar to the proposed project, Alternative B could result in significant unavoidable impacts to utilities and service systems. 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.

3 Statement of Overriding Considerations

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

- **Air Quality (Tier II) (Appendix G, Checklist Questions III,b,c)**

  Construction and operational emissions under Tier II could exceed, depending on specific project details including construction schedule and activities, the applicable air quality thresholds. Because Tier II projects are expected to occur far in the future, and specific details about Tier II are unknown, emissions associated with construction and operational activities under Tier II have not been quantified. Although mitigation measures would be implemented, Tier II could potentially result in construction or operational emissions that still exceed regional or localized standards. Therefore, Tier II air quality impacts are considered to be potentially significant and unavoidable.

- **Greenhouse Gas Emissions (Tier I and Tier II) (Appendix G, Checklist Question VIII,a)**

Greenhouse Gas Emissions generated during construction and operational activities for both Tier I and Tier II could exceed the 3,000 MT CO_2e annual threshold. While MM-GHG-01 would reduce the project's GHG emissions, it cannot be stated with certainty that emissions would be reduced to comply with the long-term GHG reduction targets and goals of applicable regulatory programs. As such, impacts would be significant and unavoidable.

- **Noise and Vibration (Tier I and Tier II)**

  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 could significantly affect nearby noise-sensitive uses, while mitigation measure MM-NOI-C2 reduce construction vibration levels, it may not eliminate the predicted significant impacts entirely, therefore, construction vibration impacts would be considered significant and unavoidable after mitigation.

- **Utilities (potential operational impacts under Tiers I and II) (Appendix G, Checklist Question XIX,b,c)**

  Proposed development under the Master Plan would increase the consumption of water. The Water Supply Assessment prepared for the proposed project concluded that projected water supply during normal, single-dry, and multiple-dry water years, as included in the 25-year projection contained in the city of Los Angeles's Urban Water Management Plan, can accommodate the projected maximum water demand associated with Tier I and Tier II development. However, it should be noted that the UWMP projections end in 2040, while the Master Plan is intended to provide a framework and vision for development on the campus that could occur beyond 2040. For projects constructed in Tier II of the Master Plan, if it is determined that the water supplies are insufficient, and new offsite water infrastructure is required, there could potentially be significant and unavoidable impacts.

  Similarly, development under the Master Plan would also increase wastewater flows from the campus that would be conveyed to local sewer lines. The city of Los Angeles Bureau of Sanitation (BOS) conducted a preliminary evaluation of the project's potential impacts on existing wastewater flows, which found that based on the current approximate flow levels, the sewer system may be able to accommodate the additional wastewater flow that could occur due to new development under the Master Plan for Tiers I and II. However, further evaluation would be needed as part of the permit process to identify a specific sewer connection point. If BOS determines that there is insufficient capacity in the local sewer lines that would serve an individual future project, then the impact would be considered to be significant. Since the County cannot compel BOS to conduct further gauging and evaluation, for the purposes of the EIR, the impacts on local sewer lines are considered to be potentially 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 Olive View – UCLA Medical Center campus.
2. Implementation of the proposed project would provide the facilities and campus infrastructure necessary to meet the community's increasing health needs and demands, optimize the quality of care, and improve operational effectiveness, including reducing administrative, operational, and maintenance costs.
3. Implementation of the proposed project would result in the development of urgently needed facilities and supportive services to the County's most vulnerable populations, such as those suffering from mental illness, addiction, or physical disabilities, to ensure a seamless transition upon discharge to home or other housing options and help patients avoid cycling in and out of emergency interventions, while reducing morbidity and costs.
4. Adherence to the Master Plan's building, landscaping, lighting, and signage design guidelines during development of projects under the Master Plan would improve the visual appearance of the campus, improve wayfinding for visitors and employees, and would make the campus more accessible to the surrounding community.
5. Implementation of the proposed project would provide new recreational and open space areas on the campus, including pedestrian and equestrian trails, which would benefit on-campus employees, visitors, and members of the surrounding community.
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 new development and campus infrastructure improvements under the proposed project would result in new construction jobs and 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.