2ND ADDENDUM
FINAL ENVIRONMENTAL IMPACT REPORT
LAC+USC MEDICAL CENTER CAMPUS MASTER PLAN
(SCH NO. 2014051061)

2023 MASTER PLAN REVISIONS
PSYCHIATRIC SUBACUTE FACILITY
MENTAL HEALTH URGENT CARE CENTER
RESIDENTIAL WITHDRAWAL MANAGEMENT FACILITY

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October 2023

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1. INTRODUCTION

A. BACKGROUND

History

The original LAC+USC Medical Center was once one of the largest public hospitals in the country, playing an active and integral role in the health of Los Angeles County since the mid-1800s. The hospital increased its presence and services as the need for quality health care grew with the County's population. In 1998, the County of Los Angeles (County) embarked on a replacement for the General Hospital, which called for a 600-bed facility and associated modifications. Changes in medical delivery and technology, infrastructure demands, code and fire life/safety requirements, and changing patient expectations were some of the factors driving the need for a replacement facility. A significant amount of funding for the replacement facility came from the Federal Emergency Management Agency (FEMA) after General Hospital suffered building damage during the 1994 Northridge earthquake. Completed in 2008, the new LAC+USC Medical Center provides trauma, inpatient, and primary and specialty outpatient care services. Specifically, the replacement medical center project resulted in a new 600-bed Inpatient Tower, Clinic Tower, Diagnostic and Treatment Building, Central Plant, and Parking Structure (Marengo Structure, PS #9).

The introduction of the Affordable Care Act (ACA) influenced services and operational priorities at the LAC+USC Medical Center. In October 2013, the County began preparing the LAC+USC Medical Center Campus Master Plan Report.

Final EIR

The Los Angeles County Board of Supervisors (Board), acting on behalf of the County, certified on November 18, 2014, the LAC+USC Medical Center Campus Master Plan Final Environmental Impact Report (Final EIR), State Clearinghouse Number 2014051061.

The name of the medical center and associated project has since been changed to the Los Angeles General Medical Center Campus. However, this Addendum continues to use the original name so that continuity of environmental documentation is clear.

The Final EIR includes a revised version of the Draft EIR, Appendices, Comments and Responses to Comments. The Board approval package for the Final EIR included a Mitigation Monitoring and Reporting Program (MMRP), the CEQA Findings and Facts in Support of Findings for the Final EIR (Findings), and a Statement of Overriding Considerations (see below for further discussion of the MMRP, Findings and Statement of Overriding Considerations).

In taking action on the LAC+USC Medical Center Campus Master Plan (2014 Master Plan) in November 2014, the Board did the following:

- Determined that the Final EIR was completed in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000, et seq.), pursuant to Section 15090 of the *State CEQA Guidelines*;
- Made Findings for each of the significant effects identified in the EIR;
- Adopted the MMRP pursuant to Section 15091, determined in a statement of overriding considerations that the project benefits outweigh the project's unavoidable adverse environmental impacts; and
- Approved the project (i.e., LAC+USC Medical Center Campus Master Plan) pursuant to Sections 15092 and 15093 of the *State CEQA Guidelines.*

A Notice of Determination for the 2014 Master Plan and EIR was filed with the County Clerk and State Clearinghouse on November 19, 2014, and November 20, 2014, respectively.

The Final EIR analyzed the LAC+USC Medical Center Campus Master Plan that was dated November 2014, herein referred to as "2014 Master Plan," after meetings with stakeholders, community leaders, residents, and businesses surrounding the LAC+USC Medical Center Campus (Medical Center Campus or Campus). The 76-acre LAC+USC Medical Center Campus (project site) is surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles, in Los Angeles County. The main Campus site is generally bounded by Zonal Avenue, Mission Road, Marengo Street, and Chicago Street. State Street bisects the project site. In addition, the project site extends to parcels on each side of Mission Road north of Zonal Avenue and on both sides of Griffin Avenue west of Mission Road and includes the parking structure south of Marengo Street.

The 2014 Master Plan project was envisioned to be undertaken over a period of approximately 25 years and was designed to guide future development of the Campus and influence the delivery of health care services and health-related community programs. The Final EIR evaluated proposed development including construction of new and renovated medically related office, retail, open space, and parking uses and demolition of existing buildings and structures to accommodate new development. Full build out of the 2014 Master Plan was anticipated to result in a total of approximately 1,725,000 square feet of development throughout the Campus (removal of 722,709 square feet of existing uses; development of 1,245,000 square feet of new uses plus 450-bed hospital addition). The 2014 Master Plan is discussed in more detail in Section 2 of this Addendum.

The Board determined, based on the Final EIR, that the 2014 Master Plan would have the following types of impacts:

- No impacts: Aesthetics (construction and operation – scenic vistas, construction -- light and glare), Biological Resources (operation -- local policies), Hydrology (seiche/tsunami), Land Use (operation -- division of community), Population and Housing (displacement of housing and people). [The NOP/IS identified the project would no impact on the following resource areas: Agriculture and Forestry Resources and Mineral Resources.]

- Less than significant impacts: Aesthetics (operation -- scenic resources, light and glare; construction and operation – visual character), Air Quality (obstruct Air Quality Plan, odors; operation -- violate standards and sensitive receptors), Biological Resources (habitat modification, species, wetlands), Hazards and Hazardous Materials (operation -- routine transport, schools, emergency response; construction and operation – upset and accident), Hydrology (water quality standards, groundwater supplies, drainage and flooding, stormwater runoff), Land Use (construction -- physical division of community; construction and operation – conflict with plans), Population and Housing (population growth), Public Services (operation – police and fire; construction and operation – schools and parks), Recreation (increase use of existing, require construction of new), Transportation/Traffic (inadequate parking; operation – conflict with congestion agency, design feature hazards, emergency access, conflict with plans), Utilities (exceed wastewater treatment requirements, require expansion of facilities, construct new stormwater drainage, landfill capacity, compliance with solid waste regulations; construction – water supplies; operation – adequacy of wastewater treatment provider capacity).

- Impacts for which mitigation measures will reduce project-specific impacts to less-than-significant levels: air quality (construction -- violation of standards), Biological Resources (migratory wildlife, local policies), Cultural Resources (archaeology and paleontology), Geology and Soils, Hazards and Hazardous Materials (construction - routine transport, hazardous materials sites, emergency response, schools), Noise (operation), Public Services (police and fire), Transportation/Traffic (construction -- design feature hazards, emergency access, conflict with plans), Utilities (construction - wastewater treatment provider capacity).

- Impacts for which mitigation measures will reduce impacts, but not feasibly or effectively to less-than-significant levels (significant and unavoidable): air quality (construction), aesthetics (construction – demolition of Women's and Children's Hospital), Cultural Resources (demolition of Women's and Children's Hospital a building eligible for the California Register), Greenhouse Gas emissions, Noise

and Vibration (construction), Recreation (construction), Transportation/Traffic (operation – delay at intersections), Utilities (demand for utilities including water and natural gas).

Mitigation Monitoring and Reporting Plan

The adopted MMRP, identified the party responsible for implementing each mitigation measure (the County of Los Angeles for all, and in addition its contractors for some), the implementation phase (pre-construction, construction, design, etc.); the party responsible for monitoring (in all cases, the County of Los Angeles); and the monitoring activity/period/frequency.

CEQA Findings and Facts

The 2014 Board approval included the Findings, pursuant to PRC Section 21081 and *State CEQA Guidelines* Section 15091 and provided specific information regarding the significant environmental effects associated with the 2014 Master Plan. The document identified three possible findings, as follows, and rationale for each finding:

1. Changes or alterations were required in, or incorporated into, the project that avoided or substantially lessened the significant environmental effect as identified in the Final EIR.

2. Such changes or alterations were within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes were adopted by such other agency or could and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision for employment opportunities for highly trained workers, made infeasible the mitigation measures or project alternatives identified in the Final EIR.

The Findings provided evidence to support the findings, identified significant effects that cannot be mitigated to below the level of significance, and provided findings for each of the alternatives considered in the Final EIR. The Findings identified potentially significant impacts for Air Quality (construction -- violation of standards), Biological Resources (migratory wildlife, local policies), Cultural Resources (archaeology and paleontology), Geology and Soils, Hazards and Hazardous Materials (construction - routine transport, hazardous materials sites, emergency response, schools), Noise (operation), Public Services (police and fire), Transportation/Traffic (construction -- design feature hazards, emergency access, conflict with plans), and Utilities (construction – wastewater treatment provider capacity). Feasible mitigation was identified to reduce these effects to levels considered less than significant. The Findings identified the following impacts as remaining significant even after mitigation: Air Quality (construction),

Aesthetics (construction – demolition of Women's and Children's Hospital), Cultural Resources (demolition of Women's and Children's Hospital a building eligible for the California Register), Greenhouse Gas emissions, Noise and Vibration (construction), Recreation (construction), Transportation/Traffic (operation – delay at intersections), and Utilities (demand for utilities including water and natural gas).

Statement of Overriding Considerations

Effects that could not be reduced to less-than-significant levels were addressed in the Statement of Overriding Considerations. For these significant and unavoidable impacts identified in the Findings, the Board determined that economic, legal, social, technological, and other considerations for the 2014 Master Plan outweighed the significant and unavoidable impacts. The Statement of Overriding Considerations identified the following specific benefits the Board considered in its decision to approve the project:

1. Implementation of the proposed project would best meet the County's anticipated needs at the LAC+USC Medical Center Campus.

2. Implementation of the proposed project would provide improved visual and physical connections between the LAC+USC Medical Center Campus site and the surrounding community and would better integrate and make the Campus more accessible to the surrounding community by enhancing access, Campus identity signage and imagery, and maximizing community use of the Historic General Hospital Plaza and other similar spaces.

3. Implementation of the proposed project would promote a Campus orientation and environment that supports a culture of health and wellness by providing health-related activities like nutrition and life-style instruction and providing connections to the outdoors with options for onsite outdoor activities.

4. Implementation of the proposed project would provide new recreational and open space areas on the Campus, which would benefit on-Campus employees, visitors, and members of the surrounding community and create a more lively and receptive pedestrian experience, provide easier access across changes in site elevation, provide active, visible, and participatory ground floor functions, and enhance safety and security for nighttime activities.

5. Implementation of the proposed project would restore the LAC+USC Campus as a vibrant destination of choice, where residents and visitors can access improved healthcare facilities and programs including health education, wellness programs, and other services that promote healthier habits and lifestyles.

6. Implementation of the proposed project would replace buildings and underused space with new buildings and space that would meet seismic and fire safety requirements while also achieving sustainability initiatives.

7. Implementation of the proposed project would demonstrate sustainable design and development programs to enhance the long-term social value of the Campus by designing for pragmatic long-term operations, promote efficient energy and water use, and implement LEED and CAL Green Program goals.

8. Construction of 1,245,000 square feet of new development and a 450-bed hospital addition would result in new construction jobs. Buildout of the proposed master plan would result in an increase in the number of employees on the Campus. Increased short-term and long-term employment opportunities would provide economic benefits to the surrounding community and the region.

Previous Master Plan Changes and Prior Addendum

On December 19, 2017, the County Board of Supervisors certified an Addendum to the Final EIR that served as the CEQA documentation for the following changes to the 2014 Master Plan: addition of a 64-bed Crisis Residential Treatment Plant (CRTP) facility; addition of a 96-bed Recuperative Care (RCC) facility, provided for a replacement childcare facility (with capacity for 12 additional children), reduced biotech research and development space by 127,000 square feet (20%), provided for a different location within the Campus for the new utility plant. In total, these changes resulted in a net reduction of 46,658 square feet compared to what was approved under the 2014 Master Plan. These collective changes are referred to in this Addendum as the 2017 Master Plan Revisions. Approval of the different components of the 2017 Master Plan Revisions is occurring over time. The CRTP and RCC were approved November 12, 2019, and the childcare facility was approved March 31, 2020.

The 2017 Addendum concluded:

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

B. PURPOSE OF THIS ADDENDUM

The purpose of this second Addendum is to provide environmental analysis and to document that the currently proposed revisions to the LAC+USC Medical Center Campus Master Plan ("2023 Master Plan

Revisions") would not result in substantial changes to the project or to the circumstances under which is being undertaken due to any significant environmental impacts that were not identified in the original Final EIR (or 2017 Addendum), or result in substantially more severe environmental effects. This document has been prepared in accordance with CEQA, specifically *State CEQA Guidelines* (Title 14, Cal. Code Regs., 15000 et seq.) Sections 15162 and 15164. The 2023 Master Plan Revisions are limited to proposed new uses on the 4.5-acre former site of the Women's and Children's Hospital; the remainder of the Campus would continue to be developed as described in the 2014 Master Plan as updated by the 2017 Master Plan Revisions. It is anticipated that other components of the Master Plan on the remainder of the Campus (i.e., other than the Women's and Children's Hospital site) will be refined as part of the design process for each building and County-determined need, however, only the 2023 Master Plan Revisions are addressed in this Addendum.

C. CEQA REQUIREMENTS

An Addendum to a previously certified EIR is the appropriate document evaluate the environmental effects associated with changes or additions consisting of *minor modifications* to previously approved projects. It is appropriate when modifications would not result in new or increased significant adverse impacts.

According to Section 15164(a) of the *State CEQA Guidelines*, "the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." An addendum may be prepared if only minor technical changes or additions are necessary. A brief explanation of the decision not to prepare a subsequent EIR must also be provided in the addendum, findings or the public record.

Section 15162 of the *State CEQA Guidelines* lists the conditions that would require the preparation of a subsequent EIR or negative declaration rather than an addendum. These include the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance which was not known and could not have been known

with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

I. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

II. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

III. Mitigation measures or alternatives previously determined not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternative; or

IV. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Unlike a subsequent EIR, per Section 15162, a supplement to an EIR may be prepared per Section 15163 under the following conditions.

(a) The Lead or Responsible Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

(1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and

(2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

The proposed revisions to the previously approved Master Plan ("2023 Master Plan Revisions") are described in **Section 2** of this Addendum. As described in **Section 2**, the 2023 Master Plan Revisions would be within the construction and operation assumptions analyzed in the Final EIR and 2017 Addendum. The 2023 Master Plan Revisions have been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the *State CEQA Guidelines*. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified LAC+USC Medical Center Master Plan Final EIR is the appropriate environmental documentation under CEQA for the 2023 Master Plan Revisions. **Section 3** discusses issue-by-issue how the impacts anticipated for the 2023 Master Plan Revisions would be within the previously identified impacts analyzed in the Final EIR.

The Mitigation Monitoring and Reporting Program (MMRP) adopted with the Final EIR would continue to apply to the 2023 Master Plan Revisions to ensure that all significant impacts remain less than significant where it is feasible to mitigate such impacts.

D. REVISIONS TO STATE CEQA GUIDELINES

The California Natural Resources Agency adopted revisions to the *State CEQA Guidelines* that became effective on December 28, 2018, which occurred after preparation of the Final EIR. These revisions are reflected in the discussion of each topic in this Addendum (see Chapter 3). The updated *State CEQA Guidelines* Appendix G is used in this document as it is the latest checklist reflecting a clearer organization of issues; the changes did not add topics compared to what was evaluated in the Final EIR, rather topics are reorganized and clarified.

E. MITIGATION MEASURES

The Final EIR identifies mitigation measures that would reduce the potentially significant impacts of the 2014 Master Plan These mitigation measures were adopted as part of the 2014 Master Plan approval process and are listed in **Table 1.** No changes are necessary or are proposed to the measures as adopted. These mitigation measures will continue to be implemented as applicable and appropriate to the revised activities that are the subject of this Addendum.

Table 1
Adopted Mitigation Measures

Aesthetics	**MM-AES-1:** All new development proposed under the master plan shall be sited and designed to ensure that those views identified as important by the County are not obstructed.
Air Quality	**MM-AQ-1**: To reduce VOC emissions during construction, the County (or its contractors) shall use low-VOC coatings that go beyond the requirements of SCAQMD Rule 1113 and have a VOC content of 10 g/L or less during construction. **MM-AQ-2:** To reduce NOX emissions during construction, the County (or its contractors) shall ensure that all off-road diesel-powered equipment used during construction will be equipped with an EPA Tier 4 Interim engine, except for specialized construction equipment in which an EPA Tier 4 Interim engine is not available. The use of Tier 4 Interim engines will also act to reduce ROG and PM emissions from construction equipment. **MM-AQ-3:** To reduce NOX and PM emissions during construction, the County (or its contractors) shall implement the following measures during construction. • Haul and delivery truck idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to less than 3 minutes (beyond that required by the California airborne toxics control measure, 13 California Code of Regulations [CCR] 2485). Clear signage shall be provided for construction workers and construction vehicles at all access points. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • A traffic control plan shall be prepared.

	• A carpool program for construction workers, including incentivizing carpooling as well as providing bus service for crew members, shall be implemented. • Truck deliveries shall be consolidated when possible.
Biological Resources	**MM-BIO-1:** To avoid impacts on roosting bats, preconstruction surveys shall be conducted prior to the on-set of work within the vicinity of vacant buildings and prior to tree removal. During surveys, biologists shall avoid unnecessary disturbance of potentially occupied roosts. Full-spectrum acoustic detectors shall be used during emergence surveys to assist in species identification. If it is determined that trees or structures in the project area are being used by bats as roost sites, the following protective measures shall be implemented: • Disturbance of maternity roosting structures or trees (e.g., structure removal, construction equipment operation near roosts, tree trimming or removal) shall not occur during the maternity period (April 15 to September 15) to avoid impacts on reproductively active females and active maternity roosts (whether colonial or solitary). The maternity roost shall remain undisturbed from the time it is located until the following September 15 or until a qualified biologist has determined the roost is no longer active. No construction work shall occur at the roost or within a 100-foot-wide buffer zone (or an alternative width, as determined in consultation with CDFW) until September 15. • Exclusion devices may be installed outside of the maternity period (September 16 to April 14) to preclude bats from occupying buildings during, or prior to the on-set of, construction. Exclusionary devices shall be installed only by or under the supervision of an experienced bat biologist. Eviction of bats roosting in trees outside the maternity season shall be done in favorable weather under the supervision of a qualified bat biologist and adhering to the following two-step removal process: o On Day 1, for trees with cavities, crevices, and exfoliating bark, and that are determined to support roosting bats, Step 1 would be the removal of branches and limbs with no cavities. These limbs shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree, which may not have been detected during the preconstruction survey, will either abandon the roost immediately (rarely) or, after emergence, will avoid returning to the roost. For foliage roosting bats, Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. On Day 2, under the supervision of a qualified biological monitor familiar with the life history of subject bat species, the tree may be removed. o Qualified biologists should search all downed roost trees for dead and injured bats. The presence of dead or injured bats that are species of special concern shall be reported to CDFW. • Non-maternity roost trees should ideally be removed or trimmed in the fall between September 16 and October 31. If the removal of non-maternity roost trees cannot be timed to occur within this period, tree trimming and removal of non- maternity roost trees shall be timed to avoid periods of inclement or unseasonably cold weather to avoid impacts on bats in torpor (a period of seasonal inactivity). In all circumstances, qualified biologists shall monitor non- maternity tree removal. **MM-BIO-2:** The County shall avoid the nesting season for birds or conduct preconstruction nesting bird surveys if construction activities are carried out during the nesting season. To ensure compliance with the MBTA and similar provisions under Sections 1600–1616 of the California Fish and Game Code, the County of Los Angeles, through the general contractor, shall conduct all vegetation removal during the non- breeding season, between September 1 and February 14, or implement the following: • If the removal of vegetation, demolition of buildings, or noise-generating construction activities are scheduled between February 15 and August 31, the County of Los Angeles Department of Public Works or the construction contractor shall retain a qualified biologist (i.e., experienced with conducting nesting bird surveys) who shall conduct a focused nesting bird survey prior to the start of vegetation removal, building demolition, or noise-generating activities within any potential nesting habitat (i.e., all vegetation, buildings, eaves on buildings, etc.). The size of the nesting bird survey area shall be determined by a qualified biologist at the time of the survey and include the entire limits of disturbance. It may also include a buffer area if deemed necessary by the biologist. The preconstruction nesting bird surveys shall be conducted no more than 7 days prior to initiation of vegetation removal, building demolition, or noise-generating construction activities. If no active nests are detected during these surveys, no restrictions on project activities shall be necessary. • If active nests are found, a qualified biologist shall identify and flag an appropriate buffer around the nest, and no construction activities shall occur within the buffer until the qualified biologist has determined that the young have fledged or the nest is no longer active. The specific buffer width shall be determined

	by a qualified biologist at the time of discovery and vary according to the bird species, site conditions, and the type of work activities to be conducted. The survey results shall be submitted to County of Los Angeles Department of Public Works for review and approval of the recommended nest buffer areas, if any, prior to the commencement of any vegetation removal, building demolition, or noise-generating construction activities on the project site. **MM BIO-3:** Prior to the removal of any trees, a qualified arborist shall inventory native oak trees on the project site to support the application regarding the impacts on oak trees. Oak tree permit requests require a property owner to file an application with the Department of Regional Planning and provide a filing fee, an oak tree report, site plans for the property, and maps of the surrounding area. The oak tree report shall include information about the protection of oak trees that may be adjacent to construction activities that are to remain. The oak tree report shall also include the proposed replanting plan, in accordance with the required replacement ratio, for any oak trees that are to be removed.
Cultural Resources	**MM-CR-1:** Prior to the removal of or alterations to the 1933 retaining walls or the overall setting of State Street, which are considered character-defining features of the General Hospital/Acute Unit setting, documentation of these features of the General Hospital setting in a manner that meets Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) standards shall be prepared. This shall include photographs and drawings of the current conditions, including State Street, the retaining walls, the forecourt, and the ancillary buildings. Preservation of the character-defining features shall be attempted. **MM-CR-2:** Prior to demolition of the Women's and Children's Hospital, documentation of this property to HABS/HAER standards shall be prepared. Character-defining features shall be called out, and a historic context for this building shall be prepared. **MM-CR-3:** A protection plan for the viaduct/tunnel shall be prepared prior to the construction of any master plan project that would occur in the immediate vicinity of the viaduct/tunnel. This protection plan shall be prepared by a qualified historic preservation specialist who shall document the current condition of this structure before any construction begins and monitor the structure during construction. **MM-CR-4:** A historic structures report shall be prepared that identifies the character- defining features of the old Administration Building and the Pharmacy/Service Building, which will provide the basis for preparation of a protection and preservation plan for these buildings. The preservation and protection plan shall be prepared by a qualified historic preservation consultant who will document the current condition of the buildings and monitor the condition of the buildings during any construction activities. **MM-CR-5:** The County shall consult with a qualified historic preservation consultant to determine appropriate street and walkway lighting that both enhances the historic setting of General Hospital and provides sufficient illumination. All new material, such as streetlights, benches, bollards, and other street/landscape furniture, shall be chosen in consultation with the historic preservation expert and meet the Secretary of the Interior's Standards. **MM-CR-6:** Prior to proceeding with construction of individual development projects that could adversely affect properties 50 years of age or older on the Medical Center Campus, the County shall evaluate those properties to determine their eligibility for the CRHR and/or NRHP. **MM-CR-7:** An updated State of California Department of Parks and Recreation (DPR) 523 form shall be prepared by a qualified architectural historian, historian, or historical architect for General Hospital and its setting that specifically identifies the contributing and non-contributing features of the historic General Hospital and its setting. The DPR 523 form shall be prepared prior to undertaking of any work within the setting of General Hospital that could adversely affect this historic resource. **MM-CR-8:** Prior to any demolition, grading, or excavation related to the construction of facilities or improvements under the master plan, a qualified archaeologist shall be retained by the County or construction contractor to determine which areas shall require cultural resources monitoring during initial ground disturbance. The location of construction activities that are likely to encounter subsurface sediments with archaeological sensitivity shall be determined by the qualified archaeologist upon review of project excavation and grading plans. If determined necessary, monitoring by a qualified archaeologist shall be conducted in the project area during all initial ground- disturbing activities. If, during cultural resources monitoring, the archaeologist determines that the sediments being excavated have been previously disturbed and are unlikely to contain significant cultural materials, the archaeologist shall request that monitoring be reduced or eliminated. Spot- check monitoring shall occur during all construction, on a schedule determined by the project archaeologist. If buried cultural resources such as trash deposits, building foundations, privy pits, flaked or ground stone, or human remains are inadvertently discovered during ground- disturbing activities, work shall stop in that area

	and within 100 feet of the find. Treatment measures for items that are not associated with human remains typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation. **MM-CR-9:** Prior to any excavation related to the construction of facilities or improvements proposed under the master plan, a qualified vertebrate paleontologist with a graduate degree and more than 10 years of experience shall be retained by the County or construction contractor to determine areas that shall require paleontological monitoring during initial ground disturbance. The locations for construction activities, especially excavation for the proposed parking garages, which is likely to encounter subsurface sediments with high paleontological sensitivity, shall be determined by the qualified paleontologist upon review of project excavation and grading plans. Very shallow surficial excavations (i.e., less than 5 feet in depth) within areas of previous disturbance or areas of Quaternary younger alluvial deposits shall be monitored on a part-time basis to ensure that underlying sensitive units (i.e., Quaternary older alluvium) are not adversely affected. Areas consisting of artificial fill materials shall not require monitoring. If excavations for the project take place in Quaternary older alluvial deposits or within Fernando or Puente Formation bedrock, such excavations shall be monitored on a full-time basis by a qualified paleontological monitor and under the supervision of the qualified paleontologist. The paleontological resource monitoring shall include inspection of exposed rock units during active excavations within the geologically sensitive sediments. Monitoring may be reduced if some of the potentially fossiliferous units described herein are, upon exposure and examination by qualified paleontologic personnel, determined to have a low potential for containing fossil resources. The paleontologic monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall have authority to temporarily divert grading away from exposed fossils to recover the fossil specimens professionally and efficiently and collect associated data. All efforts to avoid delays in project schedules shall be made. To prevent construction delays, paleontological monitors shall be equipped with the necessary tools for the rapid removal of fossils and retrieval of associated data. This equipment shall include handheld global positioning system receivers, digital cameras, and cell phones as well as a tool kit with specimen containers, matrix sampling bags, field labels, field tools (e.g., awls, hammers, chisels, shovels, etc.), and plaster kits. At each fossil locality, field data forms shall be used to record pertinent geologic data, stratigraphic sections shall be measured, and appropriate sediment samples shall be collected and submitted for analysis. Fossils collected, if any, shall be transported to a paleontological laboratory for processing where they shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility (such as LACM). Following analysis, a Report of Findings with an appended itemized inventory of specimens shall be prepared. The report and inventory, when submitted to the appropriate lead agency along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts on paleontological resources. **MM-CR-10:** In the event that human remains are uncovered, construction plans shall specify that construction shall halt in the area of discovery, the area shall be protected, and no further disturbance shall occur, as specified by State Health and Safety Code Section 7050.5. The County coroner shall determine the origin and disposition of the human remains pursuant to PRC Section 5097.98. If the coroner recognizes the remains to be Native American, he or she shall contact the NAHC within 24 hours. For remains of Native American origin, no further excavation or disturbance shall take place until the most likely descendant of the deceased Native American(s) has made a recommendation to the landowner or the person responsible for the excavation work regarding the means for treating or disposing of the human remains and any associated grave goods, with appropriate dignity, as provided by PRC Section 5097.9. In consultation with the most likely descendant, the project archaeologist and the project proponent shall determine a course of action regarding preservation or excavation of Native American human remains, and this recommendation shall be implemented expeditiously. If the NAHC is unable to identify a most likely descendant or the descendant fails to make a recommendation within 48 hours after being notified by the commission, the project archaeologist and the project proponent shall determine a course of action regarding preservation or excavation of Native American human remains, which shall be submitted to the NAHC for review prior to implementation.
Geology	**MM-GEO-1:** All recommendations included in the preliminary geotechnical evaluation prepared for the proposed project (see Appendix D) shall be followed. A detailed subsurface geotechnical evaluation shall be performed to address site-specific conditions at the locations of the planned improvements and provide detailed recommendations for design and construction.

	The geotechnical evaluation shall include the following measures to mitigate potential fault rupture, seismic ground shaking, and liquefaction hazards identified under Impacts GEO-1 and GEO-2. • *Seismicity*: Structural elements of future improvements shall be designed to resist or accommodate appropriate site-specific ground motions and conform to the current seismic design standards. • *Liquefaction*: An assessment of the liquefaction potential shall be made prior to detailed design and construction of project improvements. Structural design and mitigation techniques, such as in situ ground modification or supporting foundations with piles at depths designed specifically for liquefaction, shall be included. To evaluate the potential for liquefaction, subsurface evaluation may be performed. Site-specific geotechnical evaluations that assess the liquefaction and dynamic settlement characteristics of the on-site soils shall include the drilling of exploratory borings, evaluation of groundwater depths, and laboratory testing of soils. Methods for construction in areas with a potential liquefaction hazard may include in situ ground modification, removal of liquefiable layers and replacement with compacted fill, or support of project improvements on piles at depths designed specifically for liquefaction. Pile foundations can be designed for a liquefaction hazard by supporting the piles on dense soil or bedrock located below the liquefiable zone or employing other appropriate methods, as evaluated during the site-specific evaluation. Additional recommendations for mitigation pertaining to liquefaction may include densification by installation of stone columns, vibration, deep dynamic compaction, and/or compaction grouting. The geotechnical evaluation shall include the following measures to mitigate unstable soil impacts identified under Impact GEO-3. • *Groundwater*: Excavations for foundations in areas with shallow perched groundwater may need to be cased/shored and/or dewatered to maintain stability of the excavations and provide access for construction. All recommendations included in the preliminary geotechnical evaluation pertaining to groundwater shall be followed. Excavations for underground structures will need to be performed with care to reduce the potential for lateral deflection of excavation sidewalls and/or shoring, which may also cause differential movement of structures located near the excavation. Further study, including subsurface exploration, shall be performed during the detailed design phase of future improvements to evaluate the presence of groundwater, seepage, and/or perched groundwater at the site and the potential impacts on design and construction of project improvements. An assessment of the potential for shallow groundwater shall be made during the design phase of the project, and mitigation techniques shall be developed as necessary. • *Collapsible Soils/Settlement*: An assessment of the potential for soils that are prone to settlement shall be made prior to detailed design and construction of project improvements, and mitigation techniques shall be developed, as appropriate, to reduce impacts related to settlement to low levels. During the detailed design phase of the project, surface reconnaissance and site- specific geotechnical evaluations shall be performed to assess the settlement potential of the on-site natural soils and undocumented fill. This may include detailed surface reconnaissance to evaluate site conditions, drilling of exploratory borings or test pits, and laboratory testing of soils, where appropriate, to evaluate site conditions. Prescribed mitigation measures for soils with the potential for settlement shall include either removal of the compressible/collapsible soil layers and replacement with compacted fill, surcharging to induce settlement prior to construction of improvements, allowing for a settlement period after or during construction with new fills, or a specialized foundation design, including the use of deep foundation systems to support structures. Varieties of in situ soil improvement techniques are also available, such as dynamic compaction (heavy tamping) or compaction grouting. The geotechnical evaluation shall include the following measures to mitigate the expansive and corrosive soils hazards identified under Impact GEO-4. • *Expansive Soils*: Mitigation techniques to reduce expansive soil potential shall be included as necessary. Techniques shall include overexcavation and replacement with non-expansive soil, soil treatment, moisture management, and/or a specific structural design for expansive soil conditions developed during the design phase. • *Corrosive Soils*: An assessment of the potential for corrosive soils shall be made during the detailed design phase of the project through soil testing procedures. Mitigation techniques shall be developed, as appropriate, to reduce impacts related to corrosive soils to low levels. Subsurface evaluation, including laboratory testing, shall be performed. Evaluation of the corrosive soil potential shall be accomplished through testing and analysis of soils at foundation design depths. The

	laboratory tests conducted on the soils prior to construction and improvement plan preparation shall include corrosivity tests. Review of these data by a corrosion engineer will result in corrosion protection measures that will be suitable to the project elements. Evaluation of the potential corrosive soils hazard shall be performed prior to detailed design and construction so that, in the event the hazard exists, mitigation techniques may be implemented. To avoid site-specific subsurface evaluation, corrosion protection measures may be included in the initial design for the proposed project improvements. Mitigation for corrosive soil conditions may involve the use of concrete that is resistant to sulfate exposure. Corrosion protection for metals may be needed for underground foundations or structures in areas where corrosive groundwater or soil could cause deterioration. Typical mitigation techniques include epoxy and metallic protective coatings, the use of alternative (corrosion-resistant) materials, and selection of the appropriate type of cement and water/cement ratio. **MM-GEO-2:** All earthwork and grading shall be performed in accordance with the recommendations in the SWPPP and the Construction Activities Stormwater General Permit. Additionally, BMPs related to ongoing drainage design and maintenance practices shall be included in the SWPPP and implemented to reduce soil erosion during operation of the proposed project. The BMPs shall include design procedures such as a surface drainage design for roadways and facilities to provide for positive surface runoff and reduce concentrated runoff conditions. Other examples of BMPs include the use of erosion prevention mats or geofabrics, silt fencing, sandbags and plastic sheeting, and temporary drainage devices.
Greenhouse Gas Emissions	**MM-GHG-1.** To reduce GHG emissions during operations, the County shall incorporate the following mitigation measures into the design of each new element, as practicable. • Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility. The project applicant should commit to applying to the local utility to install the maximum number of solar panels possible. • Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting. • Maximize the planting of trees in landscaping and parking lots. • Use passive heating, natural cooling, solar hot water systems, and reduced pavement. • Utilize only Energy Star heating, cooling, and lighting devices, and appliances. • Install light colored "cool" roofs and cool pavements. • Limit the use of outdoor lighting to only that needed for safety and security purposes. • Require use of electric lawn mowers and leaf blowers. • Require use of electric or alternatively fueled sweepers with HEPA filters. • Use of water-based or low VOC cleaning products. • Install Electric Vehicle (EV) Charging Stations on at-least 5% of all vehicle parking spaces, consistent with City of Los Angeles requirements for all new projects.
Hazards	**MM-HAZ-1:** In order to minimize exposure, prior to demolition activities, asbestos- containing materials and lead-based paint surveys and evaluations shall be conducted in buildings that are to be demolished or renovated. Abatement measures shall be implemented in accordance with the recommendations of these evaluations. Asbestos surveys shall be conducted in accordance with SCAQMD Rule 1403, which specifies that all surveys are to be carried out by a Cal/OSHA-certified asbestos consultant and will follow established survey protocols, notification, and work practice requirements. Lead-based paint surveys shall be carried out by California Department of Public Health (CDPH)-certified inspector/assessor. If necessary, a lead abatement plan would be prepared by the CDPH-certified project monitor or supervisor, and demolition activities would be performed by CDPH- certified workers. **MM-HAZ-2:** Prior to start of construction, an additional investigation of the leaking underground storage tank site at 1200 North State Street (according to SWRCB's GeoTracker website, groundwater is currently being monitored at the address) shall be conducted to determine its potential impact on project site development. In the event that environmental concerns are discovered, a certified geologist or industrial hygienist will specify

	an appropriate course of action, which may involve removal and disposal of contaminated materials, and remediation of the area of concern.[1] **MM-HAZ-3:** As part of a Phase II Environmental Site Assessment, prior to construction, additional investigations at the former suspected locations of USTs (both abandoned in place and those where no records of removal have been found) and the former boilers and powerhouse. In the event that environmental concerns are discovered, a certified geologist or industrial hygienist will specify an appropriate course of action, which may involve removal, disposal, and remediation of the area of concern.
Hydrology	**MM-HYD-1**: Construction activity (clearing, grading, excavation, stockpiling, and reconstruction of existing facilities involving removal and replacement) resulting in a land disturbance of one or more acre, or less than one acre but part of the larger master plan for the Campus must obtain the Construction Activities Storm Water General Permit. Prior to beginning any construction activity, the County shall require the contractor(s) to develop the SWPPP, Construction Activities Storm Water General Permit, erosion/sediment control plan, and submit these plans for approval by the governing regulatory agency. The contractor(s) shall then perform all construction activity in accordance with the recommendations in the SWPPP, the Construction Activities Storm Water General Permit, and erosion/sediment control plan. The contractor's erosion control plan must comply with the California Stormwater Best Management Practices Handbook and meet the requirements of the statewide Construction General Permit. **MM-HYD-2:** LID features shall be designed to improve water quality and minimize the leaching of nutrients from growing media. Best design practices based on the latest monitoring and research recommendations shall be incorporated. In addition to avoiding the use of growing media, mulch, and compost containing animal products, which may leach nutrients, design modifications may include incorporation of an internal storage zone. With an internal storage zone, the underdrain is elevated and anaerobic conditions are created, causing denitrification to occur, provided that a carbon food source is provided for the denitrifying bacteria. Additionally, due to the large area of proposed landscaping, phosphorous is a likely pollutant in stormwater runoff from the site. Phosphorous can be minimized through organic maintenance methods, Integrated Pest Management, and avoiding products containing animal manure or other animal products. Although these practices apply specifically to bioretention, they should also be considered for other landscape-based LID features that could be included in the final design. If phosphorous is added to the 303(d) list for the Los Angeles River Reach 2 or the Tier 3 Pollutants of Concern for the Los Angeles River Watershed Management Area, then it becomes a pollutant of concern for the receiving water body and the specialized design measures shall be incorporated at the landscape-based LID features proposed for the site. **MM-HYD-3:** Where groundwater seepage is expected, permanent monitoring wells shall be installed during construction within and around the perimeter of each building to monitor the groundwater level and evaluate the performance of the dewatering system. Before starting dewatering operations, a baseline conditions survey shall be made of all adjacent foundations and structures to assess the impact of deep excavation dewatering on adjacent structures. All signs of existing distress shall be recorded. **MM-HYD-4:** Irrigation water demands above existing irrigation demands shall be met by alternative supply sources to the maximum extent technically feasible. The use of alternative water supply sources for irrigation shall be maximized to reduce the use of potable water for irrigation and approximate existing irrigation demands. Alternative water supply sources include, but are not limited to, reclaimed water, gray water, harvested rainwater (stormwater), and air-conditioning condensate (although not specifically mentioned in the master plan, this could represent a significant source of clean irrigation water). **MM-HYD-5:** During and after construction, positive drainage shall be provided to direct water away from buildings and foundations. Where positive drainage is not provided, area drains shall be used to drain depressions or low spots that are not part of the designed LID **MM-HYD-6:** An Operations and Maintenance Plan shall be developed for LID features at the site during the design of the initial development projects and expanded as development progresses and different LID features are added. The plan shall consider impacts on water quality and address issues related to Integrated Pest Management or organic maintenance practices, including those for hand weeding. The use of fertilizers, pesticides, herbicides, and products containing animal manure or animal products shall be avoided within any LID features at the project site. Outside of the LID features, Integrated Pest Management and organic maintenance practices shall be used.

1 The Geotracker web site indicates that cleanup of this leaking underground storage tank was completed as of 8/30/2021. Therefore, this mitigation measure has been completed.

Noise	**MM-NOI-1: Reduce Construction Noise to the Extent Possible**. The County shall implement the following noise reduction measures during construction: • Construction activities should be limited to between the hours of 7 a.m. to 7 p.m. on Monday through Friday or 8 a.m. to 6 p.m. on Saturdays, and should not occur at any time on Sundays or legal holidays. Construction personnel should not be permitted on the job site, and material or equipment deliveries and collections should not be permitted outside of these hours. • To the fullest extent practicable, the quietest available type of construction equipment should be used. Newer equipment is generally quieter than older equipment. The use of electric powered equipment is typically quieter than diesel or gasoline powered equipment, and hydraulic powered equipment is typically quieter than pneumatic power. • Where possible, impact pile driving should be replaced with other piling techniques, such as vibratory pile driving or drilled and poured-in-place piles. • All mobile and fixed noise-producing equipment used on the proposed project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity. • All construction equipment should be properly maintained. Poor maintenance of equipment typically causes excessive noise levels. • All construction equipment, stationary and mobile, should be equipped with properly operating and maintained mufflers, air- inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features that meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., arc welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment. • All noisy equipment should be operated only when necessary, and should be switched off when not in use. • The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. • To the extent practicable, temporary barriers should be employed around the project site and/or around noisy construction equipment. • For barriers to be effective they should break the line-of site between the equipment and any noise-sensitive receiver. These barriers may be constructed as follows: o From commercially available acoustical panels lined with sound absorbing material (the sound absorptive faces of the panels should face the construction equipment). o From common construction materials such as plywood and lined with sound absorptive material (the sound absorptive material should face the construction equipment). o From acoustical blankets hung over or from a supporting frame. The blankets should provide a minimum sound transmission class (STC) rating of 28 and a minimum noise reduction coefficient (NRC) of 0.80 and should be firmly secured to the framework with the sound absorptive side of the blankets oriented towards the construction equipment. The blankets should be overlapped by at least 6 inches at seams and taped so that no gaps exist. The largest blankets available should be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier. • Construction employees shall be trained in the proper operation and use of the equipment. Careless or improper operation or inappropriate use of equipment can increase noise and vibration levels. Poor loading, unloading, excavation, and hauling techniques are examples of how a lack of adequate guidance and training may lead to increased noise and vibration levels. • Storage, staging, parking, and maintenance areas shall be located away from sensitive receptors. Where this is not possible, the storage of waste materials, earth, and other supplies should be positioned in a manner that will function as a noise barrier to the closest sensitive receivers. • Stationary noise sources such as generators and compressors should be positioned as far away as possible from noise sensitive areas. • Construction equipment shall be stored on the project site while in use. This will eliminate noise associated with repeated transportation of the equipment to and from the site.

	• To the extent possible, haul roads should not be designated through noise-sensitive areas. **MM-NOI-2: Design Non-Residential Project Buildings to Comply with CALGreen Exterior-to-Interior Noise Control Standards**. During the architectural and engineering design phase of each new non- residential building that would be located within the 65 dB CNEL contour of any of the surrounding roadways (i.e., within 129 feet of Marengo Street, 172 feet of Mission Road, 46 feet of Zonal Avenue, 590 feet of I-5, or 482 feet of I-10), and prior to the issuance of any building permits for the building, the County shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to comply with the State of California Green Building Standards Code. Such mitigation measures may include, but are not limited to: installation of sound-rated windows or upgrades to façade wall elements. It is noted that this mitigation measure does not apply to "buildings with few or no occupants or where occupants are not likely to be affected by exterior noise, as determined by the enforcement authority, such as factories, stadiums, storage, enclosed parking structures and utility buildings." **MM-NOI-3: Design Residential Project Buildings to Comply with the County of Los Angeles Building Code's Interior Noise Standards**. During the architectural and engineering design phase of each new residential building to be developed as part of the project, and prior to the issuance of any building permits for the building, the County shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to comply with the County of Los Angeles Building Code's interior noise standard of 45 dB Ldn or CNEL. Such mitigation measures may include, but are not limited to: installation of sound- rated windows or upgrades to façade wall elements. **MM-NOI-4: Design Project Facilities to Ensure All Mechanical Equipment Complies with Chapter XI of the City of Los Angeles Municipal Code.** During the architectural and engineering design phase of each new facility (building, central plant, parking structure, etc.) that would introduce new mechanical equipment to the project site, and prior to the issuance of any building permits for the facility, the County shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to ensure that the mechanical equipment complies with Chapter XI of the City of Los Angeles Municipal Code. Such recommendations may include, but are not limited to: changes in equipment locations, upgrades to central plant buildings, rooftop parapet walls, acoustical louvers or screens, or intake and exhaust silencers. **MM-NOI-5: Design and Manage Outdoor Use Areas to Ensure Organized Outdoor Events Comply with Chapter XI of the City of Los Angeles Municipal Code.** Prior to the issuance of any building permits for outdoor use areas that are anticipated to host organized events such as outdoor markets, farmers markets, summer concerts and health marches, etc. the County shall retain an acoustical consultant to evaluate the design (event layout, sound system design, etc.) and operational event details (crowd sizes, times of operation, etc.) to ensure that such events will comply with Chapter XI of the City of Los Angeles Municipal Code. Such recommendations may include, but are not limited to: controls on crowd sizes and event times, and limits on sound system power levels. **MM-NOI-6: Reduce Construction- Generated Groundborne Vibration to the Extent Possible.** The County shall implement the following vibration reduction measures during construction: • Where possible, impact pile driving should be replaced with other piling techniques, such as vibratory pile driving or drilled and poured-in-place piles. • To the extent possible, heavy construction equipment should not be operated within 111 feet of on-site or off-site sensitive receptors.
Public Services	**MM-PS-1:** The Los Angeles County project manager and construction contractor shall regularly notify and coordinate with the LAFD, LASD and LAPD on project construction design, activities, and scheduling, including any on and off Campus street or lane closures related to the proposed developments before construction begins.
Transportation/ Traffic	**MM-TRAF-1:** The County shall develop and implement traffic control measures for master plan projects that would result in lane or sidewalk closures, removal of parking, or similar traffic disruptions. Temporary traffic control during construction shall meet the requirements of the California Manual on Traffic Control Devices (CA-MUTCD). Daytime closures shall be covered by the applications shown in Chapter 6 of the manual. Overnight closures, long-term closures, and detours shall require a Traffic Control Plan, which shall be prepared as part of the project design package according to CA-MUTCD requirements. The Traffic Control Plan may include, but is not limited to, the elements listed below. Note that some of these elements may not be feasible or appropriate in all circumstances. The project-level environmental analysis shall identify the appropriate measures for each project.

	• Provide a roadway layout that shows the locations of construction activity and surrounding roadways to be used as detour routes, including special signage. • Establish detour routes in coordination with the City of Los Angeles to minimize disturbances to local traffic conditions; review potential detour routes to make sure adequate capacity is available. • Avoid creating additional delay at intersections that are currently operating under congested conditions either by choosing haul routes that avoid these locations (such as choosing haul routes that avoid the State Street/Marengo Street and State Street/Cesar Chavez Avenue intersections) or constructing during non-peak times of day (peak periods are generally 7 a.m. to 9 a.m. and 4 p.m. to 6 p.m., Monday through Friday). • Maintain access to existing residences at all times. • Work with LADOT, LASD, LAFD, and LAPD to coordinate all construction-related plans and minimize disturbances to local EMS providers; ensure that alternative evacuation and emergency routes are designed to maintain response times during construction. • Provide adequate off-street parking areas at designated staging areas for construction-related vehicles. • Work with local and regional transit providers to maintain access and circulation routes to existing stops and stations during construction phases and identify appropriate detours to provide traffic rerouting during construction while minimizing disturbance to bus services. • Work with the City of Los Angeles to maintain continuity and operation of existing pedestrian and bicycle facilities during construction. **MM-TRAF-2:** To mitigate the significant traffic impact at the intersection of State Street and Marengo Street (study intersection #13) during the AM and PM peak hours, the southbound approach on State Street (within the LAC+USC Medical Center) shall be widened and reconfigured to provide one left- turn lane, one through lane, and one shared through/right-turn lane. Traffic signal enhancements, such as additional closed- circuit television cameras, should also be considered. In addition, the existing westbound bus stop at this intersection on Marengo Street shall be relocated eastward to allow for the introduction of a separate westbound right-turn lane. The County shall consult with affected transit providers as well as LADOT to coordinate relocation of this bus stop. All elements of this mitigation measure need to be implemented to mitigate the significant impact. **MM-TRAF-3:** The County shall explore implementation of the following Transportation Demand Management (TDM) measures to further reduce vehicle trips: • provide bicycle parking for new development that exceeds the County's code requirement; • provide other bicycle-supportive amenities such as bicycle lockers; • locate a station of a bicycle-sharing system on-site; • expand the County-operated Wellness Center Shuttle to include more stops on or near the site; and, work cooperatively with other transit providers (Metro, LADOT, Metrolink, Foothill Transit, USC) to establish new transit stops or stations or to upgrade existing transit stops adjacent to the Medical Center or in the local area.
Utilities	**MM-UTL-1:** In conjunction with preparation of a subsequent CEQA environmental document for any future development project under the master plan proposed in 2035 and beyond that is defined as a "water-demand project" in Section 15155 of the *State CEQA Guidelines*, the County shall request, pursuant to Section 15155, that the water provider determine whether the projected water demand associated with the project was included in the most recently adopted urban water management plan. If required pursuant to Section 15155 and SB 610, the County shall request that LADWP prepare a water assessment for the proposed project. The County shall determine, pursuant to Section 15155, whether projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses. **MM-UTL-2:** Prior to issuance of a building permit for any future development project under the master plan that could result in an increase in wastewater generation, the County shall coordinate with the City of Los Angeles Bureau of Sanitation to conduct further detailed gauging and evaluation to identify a specific sewer connection point with sufficient capacity. If the public sewer has insufficient capacity, then the County shall be required to build a sewer line to a point in the sewer system with sufficient capacity.

Source: *2014 LAC+USC Medical Center Master Plan Final EIR and Mitigation Monitoring and Reporting Program*

F. SUMMARY COMPARISON OF SIGNIFICANT IMPACTS IDENTIFIED IN FINAL EIR COMPARED TO IMPACTS OF 2023 MASTER PLAN REVISIONS

Unavoidable significant adverse environmental impacts identified in the Final EIR are as follows: Aesthetics (demolition of the Women's and Children's Hospital); Air Quality (construction – PM10 and PM2.5); Cultural Resources (demolition of the Women's and Children's Hospital); Greenhouse Gas Emissions (emissions exceeding 3,000 MTCO2e/year); Noise and Vibration (construction and noise during operation); Recreation (construction of facilities); Transportation (vehicle trips); Utilities (cumulative contribution to demand for water and natural gas). These impacts would remain under the 2023 Master Plan Revisions (updates to the site plan and specific construction schedule for the 2023 Master Plan Revisions). Other impacts analyzed in the Final EIR were determined to be less than significant (see **Table 3** below for a summary comparison of all impacts analyzed in the Final EIR compared to impacts with the 2023 Master Plan Revisions). As discussed in the detailed analyses below, the mitigation measures identified in the Final EIR would continue to reduce impacts with the 2023 Master Plan Revisions to a less than significant level for the same issues that are reduced to a less than significant level in the Final EIR.

G. INCORPORATION BY REFERENCE

The following documents were referenced in the preparation of this Addendum, and are incorporated herein by reference, consistent with Section 15150 of the *State CEQA Guidelines*:

1. County of Los Angeles, LAC+USC Medical Center Master Plan, certified Final Environmental Impact Report, certified November 18, 2014. Referred to herein as the Final EIR [available online here: 89821.pdf (lacounty.gov)].

2. County of Los Angeles LAC+USC Medical Center Master Plan Revision, Proposed Residential Care and Childcare Facilities, Final Environmental Impact Report Addendum, November 10, 2017. Approved December 19, 2017 [available online here: 119791.pdf (lacounty.gov)].

These documents are also available for review at the Los Angeles County Public Works (DPW) Project Management Division I, 900 South Fremont Avenue, Alhambra, California, 91803

H. SUMMARY OF EFFECTS

Section 3 of this Addendum includes a detailed evaluation of potential changes in environmental effects associated with development of the Master Plan with 2023 proposed revisions for each CEQA environmental issue area, organized consistent with Appendix G of the *State CEQA Guidelines*. As summarized above, impacts would either be comparable or reduced as compared to those identified in the certified Final EIR. Therefore, as discussed in this Addendum, the 2023 Master Plan Revisions would not trigger any of the conditions that require the preparation of a Subsequent or Supplemental EIR in Sections 15162 and 15163 of the *State CEQA Guidelines*, and therefore an Addendum to the Final EIR is the appropriate CEQA document to address these changes.

2. DESCRIPTION OF CURRENTLY PROPOSED PROJECT

A. PROJECT LOCATION

The 76-acre property that comprises the LAC+USC Medical Center (project site) is located at 2051 Marengo Street, on several parcels of land owned by the County of Los Angeles (see **Figure 1**). The LAC+USC Medical Center Campus is surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles. Specifically, the main Campus is generally bounded by Zonal Avenue, Mission Road, Marengo Street, and Chicago Street. State Street bisects the Campus. In addition, the project site extends to parcels on each side of Mission Road north of Zonal Avenue and on both sides of Griffin Avenue west of Mission Road. The site is located immediately northeast of Interstate (I) 5 (Golden State Freeway) and north of I-10 (San Bernardino Freeway).

The 2023 Master Plan Revisions are limited to the site of the former Women's and Children's Hospital (see **Figure 2**). The Women's and Children's Hospital was demolished in 2021 and the site is currently graded and vacant.

B. 2014 MASTER PLAN (ANALYZED IN THE FINAL EIR)

Figure 3 shows a conceptual layout of the 2014 Master Plan analyzed in the Final EIR; **Figure 4** shows the 2014 Master Plan zones by generalized use. The Final EIR (page 2-7) identified the following objectives of the 2014 Master Plan:

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

The Final EIR evaluated proposed development including construction of new and renovated medically-related office, retail, open space, and parking uses and demolition of existing buildings and structures to accommodate new development. Full build out of the 2014 Master Plan was anticipated to result in a total of approximately 1,725,000 square feet of development throughout the Campus, with the main elements being:

- Inpatient Facilities
- Outpatient Facilities
- Medical Center Offices
- Central Utility Expansion
- Pedestrian Circulation and Access

- Biotech Research and On-Campus Housing
- Parking Facilities
- Community Open Space and Landscape Conceptual Elements

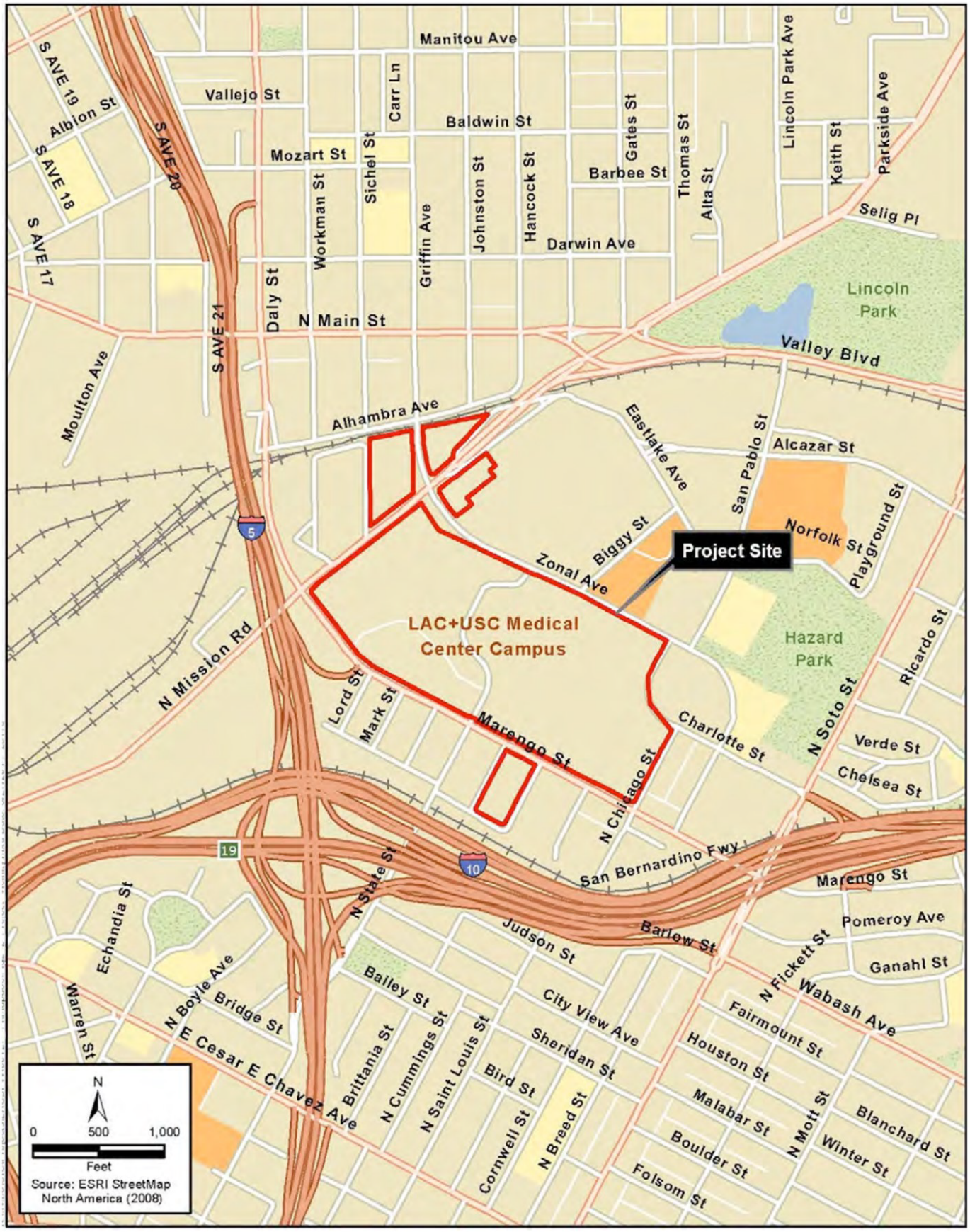
Major land use changes under the 2014 Master Plan are shown in **Table 2** (page 2-15 of the Final EIR). The table shows the uses that were on the site in 2014 that were proposed to be removed and the expected new uses under the 2014 Master Plan.

Table 2
Summary of 2014 Master Plan Land Uses

Land Use	2014 Uses to Be Removed (sf)	Proposed 2014 Master Plan Land Uses (sf)
Wellness-Oriented Community Facilities	N/A	85,000 sf of wellness-oriented meeting space and community-serving space 20,000 sf of wellness-oriented community retail
New Utility Plant and Facilities	31,000 sf of maintenance facilities 20,938 sf of utility plant and cooling towers	40,000 sf of new utility plant and maintenance facility
Outpatient Clinics/ Laboratories/ Medical Offices	457,727 sf of outpatient clinics/ laboratories/medical offices	200,000 sf of outpatient clinics/laboratories/medical offices
Professional/ Administrative Offices	197,288 sf of administrative offices	265,000 sf of professional and administrative offices
Research and Development	N/A	635,000 sf of research and development space
Hospital Addition (Inpatient)	N/A	450 new hospital beds in three new 150-bed towers*
Warehouse/Storage	15,756 sf of warehouse and storage trailers	N/A
Total	722,709 sf	1,245,000 sf and 450-bed hospital addition
Net Proposed: Approximately 522,000 sf and 450-bed hospital addition		

*Note: *An estimate of the square footage for these towers was not available when the Master Plan was completed.*
Source: County of Los Angeles. 2014. LAC+USC Medical Center Campus Master Plan.

The Master Plan identifies a plan that is divided into zones in order to provide for flexibility, but controlled development and adaptive reuse of key areas. The zones are identified as adaptive reuse, community and office, biotech research, medical services, central utility, and the coroner (see **Figure 4**). The Final EIR evaluated total development as identified in **Table 2** above and did not address the specific location of uses on the Campus but rather the Final EIR generally evaluated total areas by use Campus-wide together with the potential location of buildings (regardless of use).



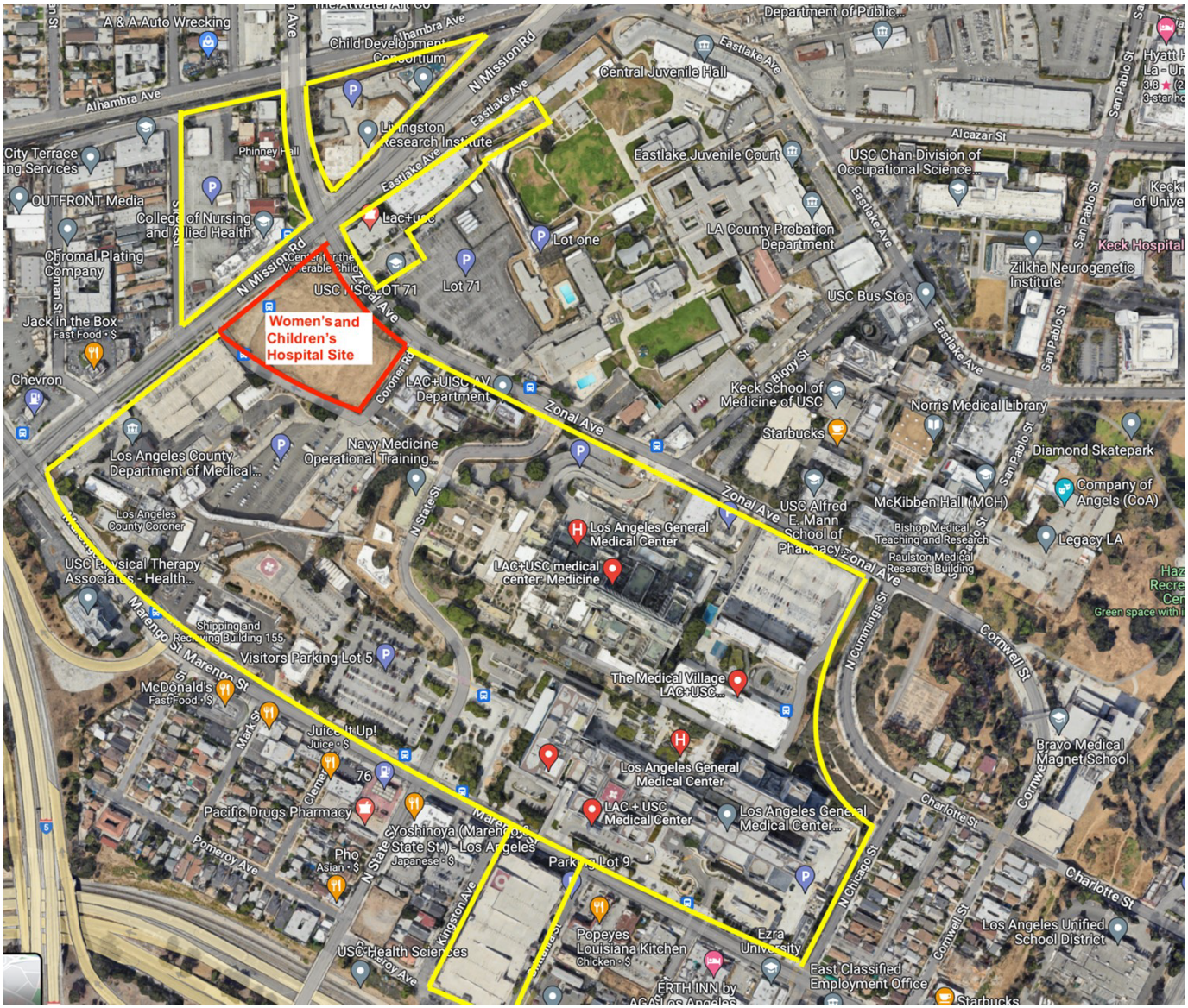
SOURCE: 2014 Final EIR

FIGURE **1**

IMPACT SCIENCES

Project Location

1250.008•09/2023



SOURCE: Google Maps, 2023.

FIGURE **2**

IMPACT SCIENCES

Women's and Children's Hospital Site

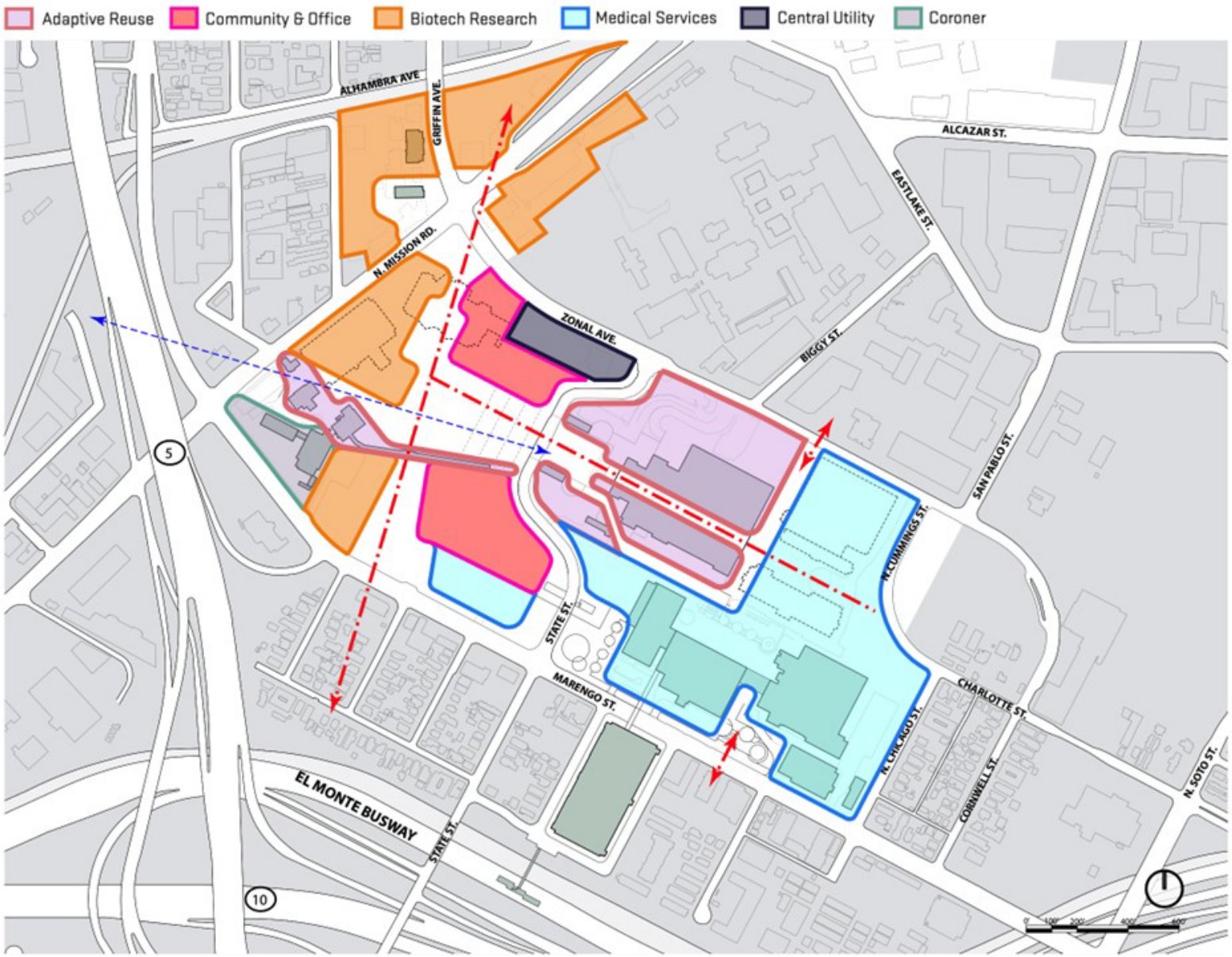
1 – Parking Structure
2 – Biotech Research
3 – Adaptive Reuse
4 – Potential Workforce Housing
5 – Parking Structure
6 – Biotech Research
7 – Bike Depot Pocket Park
8 – Biotech Research
9 – Entry Plaza
10 – Existing Thrift Shop & Coroner's Buildings to Stay
11 – Artist Meadows
12 – Biotech Research
13 – Existing Pharmacy Building to Stay
14 – Adventure Courtyard
15 – Biotech Research
16 – Community Gardens
17 – Market Plaza & Pedestrian Mall
18 – Community & Office Space Building
19 – Event Space & Central Plaza
20 – Biotech Research Buildings
21 – Underground Parking Structure
22 – The Hill Open Space
23 – New Overlook & Wellness Plaza
24 – New Parking Structure with Rooftop Farm
25 – New Outpatient & Office Building
26 – New Hospital Entry & Plaza
27 – New Outpatient & Office Building
28 – Existing Historic General Hospital – No Changes
29 – Parking Structure
30 – 3 New, 150-Bed Inpatient Towers
31 – Existing Medical Center – No Changes
32 – Existing Medical Center – No Changes
33 – Existing Central Utility Plant – No Changes
34 – Existing Parking Structure – No Changes

SOURCE: County of Los Angeles, 2014.

FIGURE **3**

IMPACT SCIENCES

2014 Master Plan Potential Site Plan



SOURCE: County of Los Angeles, 2014.

FIGURE **4**

IMPACT SCIENCES

2014 Master Plan Zones

C. 2017 MASTER PLAN REVISIONS

Figure 5 shows the site plan analyzed in the 2017 Final EIR Addendum – the 2017 Master Plan Revisions[2]. The 2017 Master Plan Revisions included the following changes as compared to the 2014 Master Plan:

1. Crisis Residential Treatment (CRTP) facility with a total of 64 beds in four two-story buildings each housing 16 beds (aimed at patients 18 and over, average stay of 10 to 14 days not to exceed the days).

2. Three-story Recuperative Care (RCC) facility with 96 beds to serve men and women discharged from the hospital who need a place to recuperate for up to three months.

3. A larger replacement childcare facility that would increase the capacity of the existing facility from 72 to 84 children (12 additional children). Two sites were under consideration (Site 2 on State Street was selected and built).

4. A reduction of 127,000 square feet (20%) in the approved new biotech research and development space, resulting in a proposed total of 508,000 square feet of biotech uses.

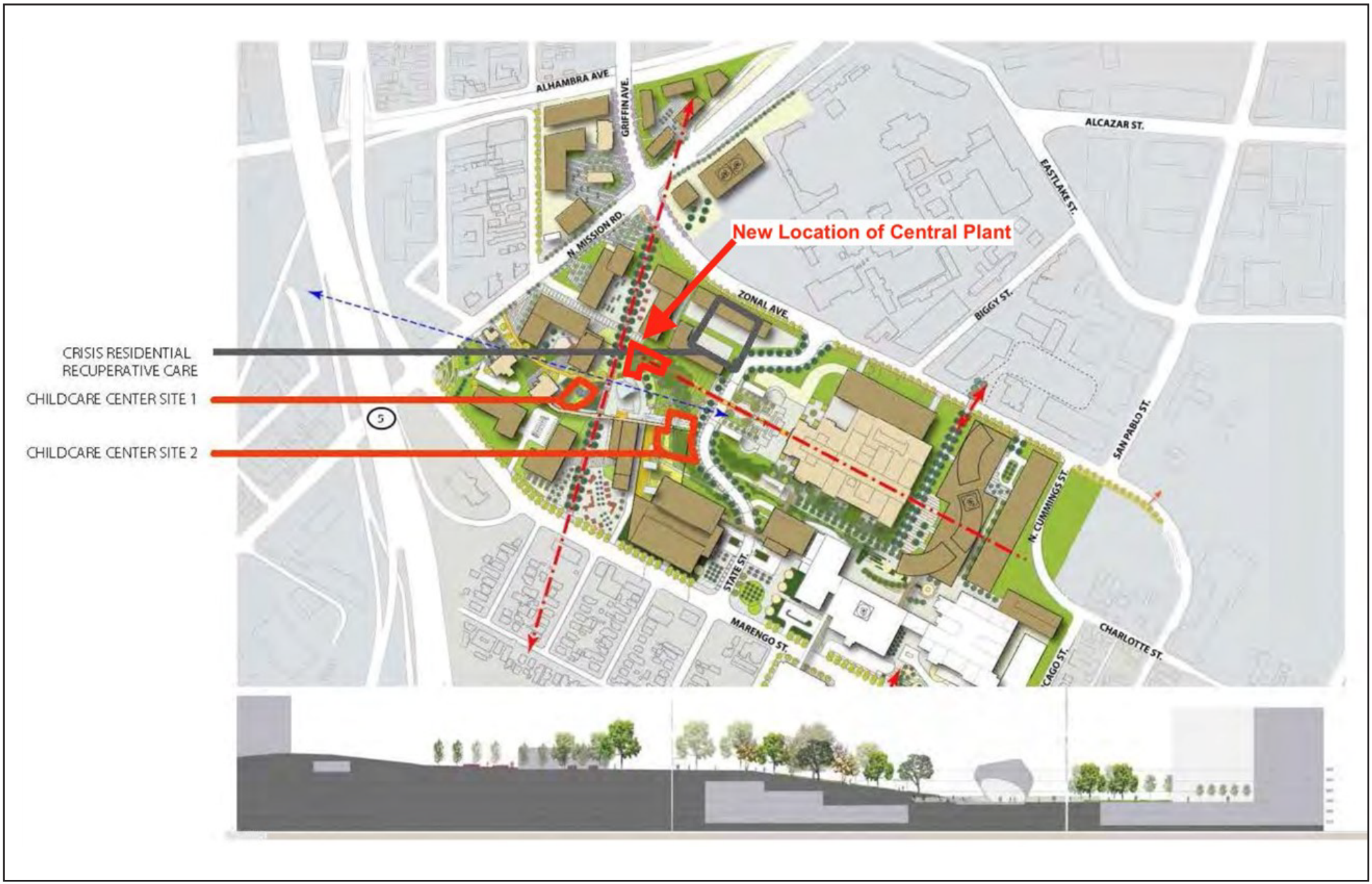
5. A different location within the Campus for the new utility plant.

The CRTP and RCC facilities together are known as Phase I of the Restorative Care Village (RCV). Phase II consists of interior renovations to existing wards inside the main hospital tower. Phase III of the RCV is contemplated as a 300-bed Permanent Supportive Housing project on the triangular property north across Zonal Avenue and west of N. Mission Road (this area was identified as 130,000 square feet of workforce housing in the 2014 Master Plan). Phases II and III of the RCV are not yet scheduled; Phases IV and V of the proposed 2023 Master Plan Revisions that are the subject of this Addendum see below).

D. 2023 MASTER PLAN REVISIONS

The 2023 Master Plan Revisions (see **Figure 6**) are limited to the 4.5-acre, former site of the Women's and Children's Hospital; the remainder of the Campus would continue to be developed as described in the 2014 Master Plan as updated by the 2017 Master Plan revisions.

2 The CRTP and RCC were approved November 12, 2019, and the childcare facility was approved March 31, 2020.



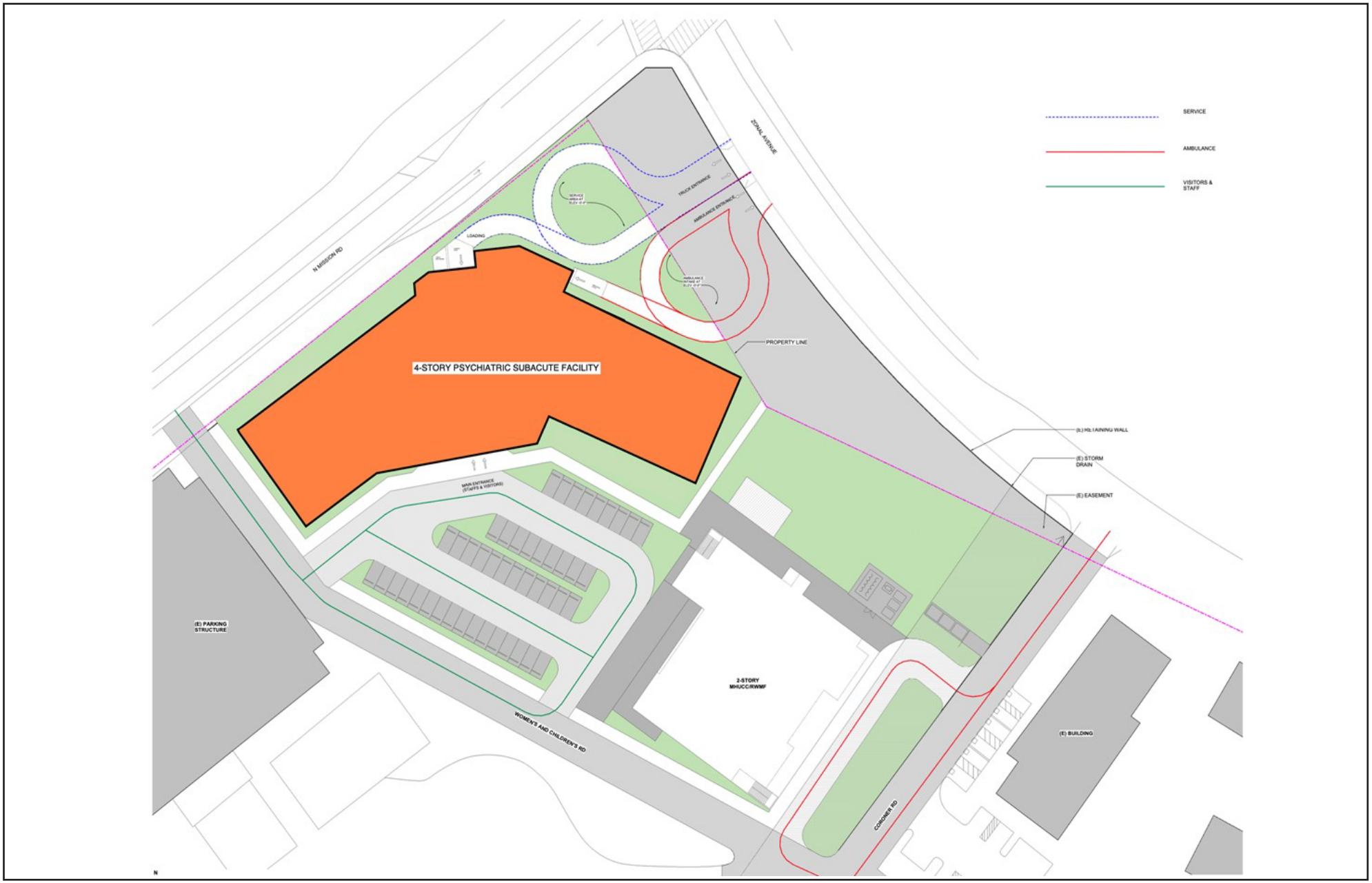
SOURCE: County of Los Angeles, 2017.

FIGURE **5**

2017 Master Plan Revisions

IMPACT SCIENCES

1250.008•09/2023



SOURCE: County of Los Angeles, 2023. *Note: The site plan is being refined; changes included in the final project will be reviewed to confirm that they are within the scope of the analysis in the 2014 Final EIR and this Addendum.

FIGURE **6**

IMPACT SCIENCES

2023 Master Plan Revisions – Women's and Children's Hospital Site Conceptual Site Plan

As shown in **Figure 6**, north of the property line of the Women's and Children's Hospital site is a piece of land owned by the City of Los Angeles. This land has previously functioned as part of the Women's and Children's Hospital site. The County is exploring options with the City of Los Angeles with respect to future uses on this property. Access to the new facilities is proposed to cross this area. This Addendum contemplates the potential use of the City of Los Angeles owned land for parking.

The Women's and Children's Hospital site slopes and currently has an elevation up to 14 feet below street level (in the center of the site) and has a retaining wall along portions of Zonal Avenue on the eastern portion of the site.

The 2023 Master Plan Revisions includes the following new components (to be constructed to LEED Gold minimum standards):

1. Two-story, 33,650 square-foot building to contain:

    a. 15,770 square foot Mental Health Urgent Care Center (MHUCC) on the first floor, with 32 adult and 8 adolescent chairs – no beds

    b. 17,880 square foot Residential Withdrawal Management Facility (RWMF) with 32 beds on the second floor.

2. Four-story, 115,420 square foot, 128-bed, Psychiatric Subacute Facility.

Surface parking (approximately 55 spaces) would be provided around the buildings. The County is exploring options to accommodate additional parking for the facilities. Up to four stories of parking was considered but is not included in the current plan but remains a possibility, depending on the final design of each building. [Parking reductions compared to the Municipal Code are consistent with County sustainability policies[3] and LEED requirements.] Additional parking would be available on and off Campus.

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3 The corner of N. Mission Road and Zonal Avenue as well as this area of Campus provides several bus and shuttle stops. In 2015 the County adopted its first Climate Action Plan (CAP) -- designed to sunset in 2020. Following and building on the CAP, the County adopted (August 6, 2019) the Our County, Los Angeles Countywide Sustainability Plan, that includes strategies to encourage development near transit and "right-size" parking to incentivize use of public transportation and active transportation modes (Strategy 3B – Implement Transit-Oriented Development, Strategy 3C - Promote walkable, mixed-use neighborhoods, Strategy 8A - Reduce vehicle miles traveled by prioritizing alternatives to single-occupancy vehicles – including Action 103: Evaluate and implement demand based priced parking at County facilities and on County streets where appropriate). The LA County Climate Action Plan, currently in preparation, also encourages reducing single-occupancy vehicle use (Strategy 3, Measure T5).

These components are known as Phases IV (MHUCC and RWMF) and V (Psychiatric Subacute Facility) of the RCV.

Figure 6 shows a potential conceptual layout of the 2023 Master Plan Revisions changes on the former site of the Women's and Children's Hospital.

The Mental Health Urgent Care Center would have an ambulance drop off on the east side of the building accessible from Coroner Road. Vehicular access would also be provided from Zonal Avenue and Women's and Children's Road (not from N. Mission Road). The main entrance to both the Mental Health Urgent Care Center and Withdrawal Management Facility would be on the west side of the building.

The 15,770-square-foot Mental Health Urgent Care Center would have the following areas: reception, security desk, waiting area, exam rooms, flexible conference rooms, director offices, family consult rooms, billing and flex office, adult and adolescent group therapy rooms, social interview room, calming room, intake room, transfer room, practitioner and staff offices, adult and adolescent day rooms, restrooms, mechanical, electrical and laundry room. The proposed Mental Health Urgent Care Center will house programs that will provide crisis stabilization services for those who are brought in by family members, friends, law enforcement officers, or paramedics. Clients can remain at the facility for up to 24 hours, at which time they will be discharged to home, community, or a higher level of care.

The 17,880-square-foot Residential Withdrawal Management Facility would have the following areas: dorms, toilets, group room, small gym, small kitchen, dining room, exam room, interview room, intake room, laundry, reception, clinical director office. The Residential Withdrawal Management Facility will provide clients with managed withdrawal care for stays of approximately 14 days or longer. The proposed facility will be licensed by the state Department of Health Care Services (DHCS) and operated by a provider that is contracted through the Department of Public Health (DPH).

The 115,430-square-foot Psychiatric Subacute facility would allow space for eight providers (two per floor) each with 16 beds (128 beds total). Recreation space would be provided in separate ground floor areas and on the upper floors, via enclosed exterior balconies. On the ground floor, there would be a shared waiting area, provider receptions, provider concierge's, security/screening area as well as vitals alcove, and toilets. Other shared areas include the following: security monitoring and operations, quiet room, nurse's station, warming kitchen, lounge/dining, multipurpose room, group room, meds (secure storage), soiled holding, storage, laundry, conference room, staff lounge, offices, and toilets. Each patient unit would have a waiting area, reception, family room, six semi-private rooms, two isolation units, one private room, a bariatric room, toilets, and showers. The Psychiatric Subacute Facility would have an ambulance drop off on the north side of the building with access from Zonal Avenue. Loading for the Psychiatric Subacute facility

would be located on the northeast corner of the building; service vehicle access is planned immediately west of the ambulance access on Zonal Avenue near the intersection with N. Mission Road.

The Women's and Children's Hospital site is currently graded and includes no vegetation. Landscaping and benches would be placed around the buildings including numerous shade trees. Consistent with the 2014 Master Plan and the County LID ordinance, vegetation would be drought tolerant, the irrigation system would be efficient and the landscaping would provide places for respite. An eight-foot decorative perimeter fence would surround the buildings.

The 2014 Master Plan does not identify building areas, rather it identifies generalized uses by zone (see **Figure 4**) and total areas by general use for the Campus (see **Table 2**) as a whole. The western portion of the site of the former Women's and Children's Hospital as well as areas of the Campus south of Women's and Children's Road and along Marengo Street are identified as being zoned for Biotech Research. The eastern portion of the Women's and Children's Hospital site as well as areas further east and further south are zoned for Community and Office uses. The 2014 Master Plan shows massing for two buildings on the Women's and Children's Hospital site. The size of the buildings and distribution of uses between community and office uses is not identified in the 2014 Master Plan, but based on rough approximations of dimensions and maximum number of stories the two buildings could contain the following maximum building areas:

- Western Building -- Biotech Research – this building appears to be up to six stories and could include up to approximately 108,000 square feet.

- Eastern Building -- Community and Office – this building appears to be up to four stories and could include up to approximately 72,000 square feet.

While these two buildings are no longer being considered for the Women's and Children's Hospital site, as the Campus continues to be designed, Biotech Research and Community and Office uses would continue to be located within the zones identified in the 2014 Master Plan for these uses.

With the 2023 Master Plan Revisions the Women's and Children's Hospital site would not be used for Biotech Research or Community and Office but would now be a new mental-health focused use – Restorative Care Village. This use is a type of medical expansion and outpatient facilities providing mental health care to the community. The Final EIR contemplated 450 new hospital beds and 200,000 square feet of outpatient/clinics. The Psychiatric Subacute facility (128 beds) and WMF (32 beds) would be less intense than a full hospital use with less equipment and activity; the 15,770 square foot MHUCC would be similar to other outpatient facilities contemplated in the Final EIR. However, since the 2023 Master Plan Revisions are being located in the Biotech and Community and Office zones it was assumed that those Master Plan

uses would be replaced and that the 2023 Master Plan Revisions would not count against Master Plan hospital beds or outpatient facilities.

Since the 2014 Master Plan and 2014 Final PEIR do not identify building areas by location, for purposes of analysis, it is assumed that the 2023 Master Plan Revisions would permanently remove a portion of the maximum Biotech Research and Community and Office building areas identified in the 2014 Master Plan massing diagrams. For purposes of analysis, it is assumed that 60,000 square feet of Biotech Research and 50,000 square feet of office space would be permanently removed from the Master Plan. Removal of this space would modify the total future Master Plan uses as follows: 448,000 square feet of Biotech Research and 215,000 square feet of professional offices. While it is anticipated that as Campus design evolves in response to County needs, less development will ultimately occur than originally anticipated, these total square footages (as modified by the 2023 Master Plan Revisions) continue to be the basis of the analysis in this addendum.

No parking was identified for this area of the Campus in the 2014 Master Plan; 55 surface spaces are now proposed. Parking for the Campus as a whole, including any unmet need from the 2023 Master Plan Revisions, would continue to be provided in accordance with the 2014 Master Plan as applicable and appropriate.

The 2014 Master Plan also considered a north-south pedestrian promenade and open space that crossed the Women's and Children's Hospital site. Due to the location of the new proposed buildings, the pedestrian promenade would be relocated east of the Women's and Children's Hospital site and would be designed in detail as the remainder of the Campus is planned and developed. While the removal of the pedestrian promenade from this portion of the Campus could affect drainage and stormwater runoff, the 2023 Master Plan Revisions would be required to comply with the County Low Impact Development Ordinance which would ensure these issues are adequately addressed. Once a new design is identified for the pedestrian promenade it will be reviewed for consistency with the analyses in the Final EIR; impacts are anticipated to be similar for the relocated promenade.

E. IMPLEMENTATION OF MASTER PLAN TO DATE

The Recuperative Care Center (3-stories, 96 beds) and the Crisis Residential Treatment Facility (four two-story buildings, 16 beds each for a total of 64 beds) addressed in the 2017 Addendum were completed in April 2022. The replacement childcare facility with capacity for 84 children as compared to the prior facility with capacity for 72 children (at Site 2, the more central location on State Street with access from Zonal Avenue) was completed in January 2023. Buildings on the Women's and Children's Hospital site were

demolished in 2021, as were some buildings on the triangular parcel north of Zonal Avenue and west of N. Mission Road.

F. CONSTRUCTION ASSUMPTIONS

The Final EIR anticipated that construction activities on the Campus would occur over a 25-year period, from 2015 to 2040, with elements of the master plan being built as the funding for each element is appropriated. This timeline remains approximately the same, however more details are now available concerning construction activities completed to date and proposed construction on the Women's and Children's site.

Demolition of the Women's and Children's Hospital was completed in 2021 and the site is currently graded and fenced. Construction of the proposed Mental Health Urgent Care Center and Residential Withdrawal Management facility is anticipated to begin in July 2024 and take 18 months to complete, with occupancy in January 2026. Construction of the proposed Mental Health Sub Acute Facility is anticipated to begin in January 2025, and require two years to complete with occupancy in January 2027. For each project the approximate breakdown of activities would be: grading — two months (no overlap; neither substantial export or import of soil is anticipated), building construction — 12 months and 18 months, building finishing — 2 months, and paving — 2 months. No other Master Plan construction is anticipated to substantially overlap with these construction activities.

Staging areas for construction would be located within the Campus and generally on the construction site. As noted in the Final EIR (page 2-15) the staging locations would be determined by the construction contractor(s) in consultation with the County. In identifying potential staging locations, the contractor and the County will consider whether there is a sufficient buffer between the staging area and offsite sensitive land uses to ensure the impacts from construction staging on these uses would be minimized.

For the purposes of the Final EIR analysis (as indicated on page 2-16), a conservative, worst-case scenario was assumed that envisioned all of the project elements being constructed at once and overlapping, rather than individual master plan projects occurring sequentially. This assumption continues to capture the maximum day activities that would occur under the 2023 Master Plan Revisions.

3. ENVIRONMENTAL SETTING AND IMPACT ANALYSIS

The Final EIR and the associated Findings of Fact and Statement of Overriding Considerations determined that the 2014 Master Plan would result in significant and unavoidable impacts in the issue areas identified below. **Table 3** compares impacts of the 2023 Master Plan Revisions to the conclusions of the Final EIR.

1. **Aesthetics** (Section 3.1 of the Final EIR). Demolition of the Women's and Children's Hospital building, an aesthetically noteworthy building because of its architectural design and historical value, was considered a significant unavoidable adverse visual impact of the proposed project (no mitigation measures were identified to address this impact).

2. **Air Quality** (Section 3.2 of the Final EIR). Emissions of PM10 and PM2.5 emissions from on-site clearing and demolition would exceed SCAQMD localized thresholds. Implementation of Mitigation measures MM-AQ - 2 and MM-AQ-3 and compliance with Rule 403 would reduce emissions, but not below the level of significance. Therefore, this impact was considered significant and unavoidable after implementation of mitigation measures.

3. **Cultural Resources** (Section 3.4 of the Final EIR). The demolition of the Women's and Children's Hospital building, a building determined eligible for listing in the California Register of Historical Resources, was considered an unavoidable significant adverse historical resources impact. (Mitigation Measure MM-CR-2 required photo documentation of the building but would not reduce the impact.)

4. **Greenhouse Gas Emissions** (Section 3.6 of the Final EIR). GHG emissions would exceed a 3,000 MT CO2e annual threshold; MM-GHG-1 would reduce emissions but not below a level of significance, therefore, GHG emissions were considered a significant and unavoidable cumulative impact.

5. **Noise and Vibration** (Section 3.10 of the Final EIR). While MM-NOI-1 would reduce construction noise levels, it would not eliminate the predicted noise impacts entirely; therefore, construction noise impacts are considered significant and unavoidable. Construction vibration impacts would be considered significant and unavoidable after implementation of mitigation measure MM-NOI-6. Large organized outdoor events at the project site were also identified as having the potential to cause a periodic substantial increase in ambient noise levels at nearby off-site sensitive receptors despite mitigation measure MM-NOI-5 that would reduce but not eliminate the impact.

6. **Recreation** (Section 3.13 of the Final EIR). Construction of new on-Campus landscaped open space areas and recreational facilities could result in noise and air quality impacts on nearby sensitive

receptors (also see Air Quality and Noise and Vibration above). Although mitigation would reduce these impacts, they would remain significant after mitigation.

7. **Transportation/Traffic** (section 3.14 of the Final EIR). Additional vehicle trips would result in significant traffic impacts at five study intersections. No feasible mitigation measures were identified for four intersections. As a consequence, the impacts to those intersections were identified as significant and unavoidable. The proposed mitigation measures at the remaining intersection is located within the City of Los Angeles and the mitigation was subject to approval by the City of Los Angeles Department of Transportation (LADOT), which was not guaranteed and therefore the impact was identified as significant and unavoidable.

   Impacts to intersections and levels of service are no longer considered significant under CEQA; traffic impacts are now evaluated based on Vehicle Miles Traveled (VMT). The project site is well-served by transit; projects in such areas have fewer impacts with respect to VMT because some trips can be made by transit rather than car. Conservatively, despite changes to CEQA to remove delay and levels of service as impacts under CEQA, operational traffic impacts are still considered significant and unavoidable for the purposes of this addendum.

8. **Utilities** (section 3.15 of the Final EIR). Increased consumption of various utilities including water and natural gas. The Los Angeles Department of Water and Power's Urban Water Management Plan identifies future water supply and demand in their service area through the year 2035; and adequate capacity was identified for the 2035 Master Plan. However, it's not known whether future water supplies beyond the year 2035 would be sufficient to meet the needs of the master plan projects constructed far in the future, i.e., beyond the year 2035. Mitigation Measure MM-UTL-1 addresses water demand through required studies but does not reduce impacts below a level of significance. Therefore, future water supply impacts, beyond the year 2035, are considered to be significant and unavoidable. Similarly, existing SoCalGas forecasts of future natural gas supplies and demand extend to the year 2030. If insufficient supplies exist for master plan projects beyond the year 2030, the impact would be significant and unavoidable. The Final EIR also identified sewer capacity as a potential issue as the County has no control over local sewer lines; mitigation measure MM-UTL-2 requires additional gauging of sewer lines for project that increase sewer flows and if no capacity is available the County is required to construct new lines to a point where capacity is available; nonetheless the impact was considered significant.

The Statement of Overriding considerations indicates that the County Board of Supervisors determined that economic, legal, social, technological, and other considerations for the 2014 Master Plan outweighed the significant and unavoidable impacts. The Statement of Overriding Considerations identified specific

benefits the Board considered in its decision to approve the project (see Section 1 Introduction for more details).

These overriding considerations are applicable to the 2023 Master Plan Revisions as the facilities would continue to provide all the benefits identified in the Statement of Overriding Considerations including meeting the County's anticipated needs, supporting a culture of health and wellness and providing jobs.

All remaining impacts were determined to be no impact, less than significant or less than significant with mitigation incorporated as summarized in **Table 4** below. With the 2023 Master Plan Revisions, and the mitigation measures previously included in the Final EIR, impacts previously identified as significant would not be worsened, and no new significant or potentially significant impacts to the physical environment would occur. Accordingly, the analyses included herein support the County's conclusion, pursuant to *State CEQA Guidelines* Section 15164, that an Addendum is appropriate, and supports a determination by the County that no subsequent EIR is required.

Table 3
Summary of Impacts – Final EIR Compared to
Impacts of the 2023 Master Plan Revisions

Impact	Level of Significance Final EIR	Level of Significance 2023 Master Plan Revisions
Aesthetics		
Adverse effect on scenic vistas.	*Less than significant impact with mitigation.* No designated scenic highways, corridors and no recognized scenic vistas. Vantages within the Campus offer views of downtown and the San Gabriel Mountains – mitigation provided to protect views, as appropriate.	*Less than significant impact with mitigation.* Buildings would continue to be required to not obstruct views.
Damage to scenic resources.	*Significant and unavoidable impact*. Demolition of Women's and Children's Hospital, an historic resource, is considered significant. Photo documentation required but does not reduce impact.	*Significant and unavoidable impact.* This impact has already occurred in anticipation of the buildings proposed as part of the 2023 Master Plan Revisions.
Degrade visual quality.	*Less than significant impact with mitigation impact.* Temporary changes during construction, project elements appropriate to setting and scale.	*Less than significant impact with mitigation*. Project buildings would continue to be appropriate to the setting and scale.
New source of substantial light and glare.	*No impact.* Net contribution from the master Plan would be negligible.	*No impact*. Project buildings would have negligible impact.
Agricultural and Forestry Resources		
Impacts to agricultural or forest resources on-site.	*No impact*. These issues were dismissed in the Final EIR Initial Study.	*No Impact*. There are no agricultural or forest resources in the project vicinity.
Air Quality		
Obstruct implementation of Air Quality Plan.	*Less than significant impact*. The project would be consistent with the City of Los Angeles general Plan and regional plans.	*Less than significant impact.* The project would continue to be consistent with applicable plans.

Impact	Level of Significance Final EIR	Level of Significance 2023 Master Plan Revisions
Air emissions during construction and operation – cumulative emissions and sensitive receptors.	*Potentially significant impact – construction; less than significant impact operation.* Construction activities could expose nearby sensitive land uses to substantial pollutant concentrations. PM10, and PM2.5 emissions could exceed local thresholds after mitigation. Regional emissions during construction and operation and localized emissions during operation would be less than significant.	*Potentially significant impact – construction; less than significant impact operation.* The 2023 Master Plan Revisions could result in similar construction and therefore would result similar emissions as compared to the 2014 Master Plan. Maximum emissions could still exceed localized PM10 and PM2.5 thresholds during construction.
Biological Resources		
Impact on habitat of protected species.	*Less than significant impact with mitigation.* There are no candidate, sensitive, or special-status animal or plant species on-site, with the exception of two California black walnut trees that do not represent a regionally significant population. The proposed project could require the removal of palm trees or other potential roost sites for Western yellow bats. Mitigation would address this impact.	*Less than significant impact with mitigation.* The Women's and Children's Hospital site has been cleared and is currently vacant. The 2023 Master Plan Revisions changes would not create any additional impacts.
Impacts to wetlands.	*No impact.* There are no wetlands on the site.	*No impact.* There are no wetlands on the site.
Interfere with movement of migratory species or wildlife corridors.	*Less than significant impact with mitigation.* Migratory birds have the potential to nest on the site in ornamental vegetation. Mitigation would address this impact.	*Less than significant impact with mitigation.* As noted above the Women's and Children's Hospital site has been cleared. Compliance with mitigation still required for any adjacent impacts.
Conflict with local policies protection biological resources.	*Less than significant impact with mitigation.* Native oaks are present on the site; mitigation would address potential removal.	*Less than significant impact with mitigation.* As noted above the Women's and Children's Hospital site has been cleared. Compliance with mitigation still required for any adjacent impacts.
Cultural Resources		
Impacts to historical resources (built environment).	*Significant and unavoidable impact.* Demolition of the Women's and Children's Hospital, which was determined eligible for the California Register, identified as a significant impact. Alterations to contributing features of General Hospital setting were also determined to be significant. Photo documentation would be required, and a protection plan and historic structures report required for other features/buildings. Nonetheless, impacts remain significant.	*Significant and unavoidable impact.* Demolition of the Women's and Children's Hospital has occurred. No additional impacts would result from the 2023 Master Plan Revisions. Impacts to other resources would continue as described for the 2014 Master Plan.
Archaeological and Paleontological Resources and human remains impacts.	*Less than significant impact with mitigation.* Ground disturbing activities have the potential to impact buried resources and remains. Mitigation would address.	*Less than significant impact with mitigation.* Grading of the Women's and Children's Hospital site has occurred. Some additional grading would be needed mitigation would continue to be required as needed.

Impact	Level of Significance Final EIR	Level of Significance 2023 Master Plan Revisions
Energy		
Wasteful, inefficient or unnecessary energy consumption.	*Less than significant impact.* The Final EIR addressed energy under Utilities. As an essential use, hospital energy use would not be wasteful or inefficient. The 2014 Master Plan included energy-efficient project design features and plans for solar electric power, solar thermal and hot water, as well as ground- source heating for various facilities. These efforts, combined with compliance with Title 24's energy conservation standards for new construction would help to offset increases. SoCalGas has only projected supplies through 2030 and therefore availability of natural gas was identified as a significant impact with respect to utilities; however this is not an impact related to inefficient or wasteful use of energy – see Utilities below.	*Less than significant impact.* The 2023 Master Plan Revisions continue to include green building measures that would ensure efficient energy use.
Geology and Soils		
Expose people or structures to risks as a result of seismic hazards.	*Less than significant impact with mitigation.* The Campus is located in the vicinity of faults and the area is susceptible to liquefaction. Mitigation measures would address site conditions.	*Less than significant impact with mitigation.* Similar impacts due to the same site conditions and compliance with existing regulations and required mitigation measures. (CEQA has been clarified to indicate that impacts of the environment on the project are not considered impacts under CEQA as long as the project does not exacerbate the condition.)
Loss of top soil, buildings located on unstable or expansive soils.	*Less than significant impact with mitigation.* Mitigation measures address geologic issues, stormwater and drainage and requires BMPs.	*Less than significant impact with mitigation.* The same mitigation would address impacts.
Paleontological Resources	See Cultural Resources above.	
Greenhouse Gas Emissions		
Generate GHG emissions that could impact the environment.	*Significant and unavoidable impact.* Estimated emissions of 37,281 MT which exceeds SCAQMD threshold of 3,000 MT. Mitigation measure would reduce emissions but not below a level of significance.	*Significant and unavoidable impact.* Emissions from 2023 Master Plan Revisions would continue to contribute to total emissions that would exceed the SCAQMD threshold.
Consistency with applicable plans related to GHG emissions.	*Less than significant impact with mitigation.* The Master Plan would be consistent with relevant polices and plans.	*Less than significant impact with mitigation.* The Master Plan would continue to be consistent with relevant polices and plans.
Hazards and Hazardous Materials		
Routine transport, upset conditions, handling of hazardous materials within ¼ mile of a school, contaminated site, interfere with emergency response.	*Less than significant impact with mitigation.* Construction and operation involve transport of hazardous materials, demolition and excavation could encounter contaminated materials (underground storage tanks, lead based paints, etc.) Bravo Medical Magnet High School and on-site children's center could be affected. Construction could impair access. Mitigation Measures address potential impacts.	*Less than significant impact with mitigation.* Compliance with existing regulations and mitigation measures would result in similar impacts to those identified in the Final EIR.

Impact	Level of Significance Final EIR	Level of Significance 2023 Master Plan Revisions
Hydrology and Water Quality		
Violate water quality standards, impact groundwater, alter drainage patterns, create runoff that exceeds capacity of stormwater drainage, substantially degrade groundwater.	*Less than significant impact with mitigation*. Stormwater runoff could impact water quality, mitigation measures would ensure adequate drainage and BMPs to address water quality and would require investigation of alternate water source for irrigation.	*Less than significant impact with mitigation*. The 2023 Master Plan Revisions would not result in substantial changes with respect to hydrology as compared to the 2014 Master Plan. Buildings would continue to be required to comply with mitigation measures identified in the Final EIR.
Impacted by seiche, tsunami.	*No impact.* There are no bodies of water nearby that could impact the site.	*No impact.* There are no bodies of water nearby that could impact the site.
Land Use and Planning		
Potential to divide a community and consistency with applicable plans.	*Less than significant impact*. Development of the Campus would be continuation of an existing use. The Project would be substantially consistent with applicable land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect.	*Less than significant impact*. The 2023 Master Plan Revisions would also represent a continuation of the existing use and would be substantially consistent with applicable plans and polices.
Mineral Resources		
Loss of mineral resources.	*No impact*. Since there are no mineral resources known to exist on the Campus. This issue was dismissed in the Final EIR Initial Study.	*No impact*. No mineral resources are known to exist in the vicinity of the Campus.
Noise		
Construction noise and vibration impacts to adjacent uses. Operational noise from interim helicopter stops.	*Significant and unavoidable impact – construction; less than significant impact with mitigation -- operation*. Based on anticipated construction equipment and distance to sensitive receptors on-site construction noise and vibration impacts would be significant**.** Mitigation would reduce but not eliminate the impacts. Mitigation would reduce noise from mechanical equipment to a less than significant level. Operational impacts could result from outdoor events; mitigation measures would reduce but not eliminate the impact. As a result of increased vehicle trips operational noise would increase but by a less than significant amount.	*Significant and unavoidable impact – construction; less than significant impact with mitigation -- operation.* Grading and construction activities would occur in a similar manner as described in the Final EIR. The Final EIR evaluated construction noise impacts at similar distances to sensitive receptors as would be impacted with the 2023 Master Plan Revisions and therefore impacts would be similar. Operational impacts would also continue to be similar to those evaluated in the Final EIR.
Located near an airport.	*Less than significant impact.* Aircraft operations associated with the two on-site helipads are not expected to change significantly as a result of the project and noise impacts would be less-than-significant.	*Less than significant impact*. The 2023 Master Plan revisions would not affect heliport operations.
Population and Housing		
Induce substantial population growth.	*Less than significant impact*. Construction jobs are anticipated to draw from the local labor pool and not have a notable impact on housing demand. Operational employment would be consistent with local and regional forecasts.	*Less than significant impact*. The 2023 Master Plan Revisions would create construction jobs. Impacts would continue to be similar to those described in the Final EIR.
Displace housing or people.	*No impact.* There are no housing units on Campus at present.	*No impact.* There are no housing units on Campus at present.

Impact	Level of Significance Final EIR	Level of Significance 2023 Master Plan Revisions
Public Services		
Impact to emergency access, police services, library services and parks such that new facilities need be constructed.	*Less than significant impact with mitigation for emergency access.* Mitigation required to address impacts to police access during construction. Other impacts would be less than significant with no mitigation required.	*Less than significant impact with mitigation for emergency access.* The 2023 Master Plan Revisions could include similar construction activity and result in similar total development. Impacts would be similar to those analyzed in the Final EIR.
Recreation		
Impact to existing recreational facilities.	*Less than significant impact*. Project construction and operation would not create substantially increased use of existing parks and recreational facilities.	*Less than significant impact*. The 2023 Master Plan Revisions would include similar construction activity and result in less total development. Impacts would be similar to those analyzed in the Final EIR.
Require construction of new recreational facilities that would impact the environment.	*Significant and unavoidable impact – air quality and noise (see above).* The project would involve construction of recreational facilities throughout the Campus (walkways, open areas). As noted above construction would result in significant air and noise impacts; mitigation would reduce but not eliminate impacts.	*Significant and unavoidable impact – air quality and noise (see above).* The 2023 Master Plan Revisions include recreational areas; impacts would continue to be the same as those evaluated in the Final EIR.
Tribal Cultural Resources		
Result in a substantial adverse impact to a tribal cultural resource	*Less than significant impact with mitigation.* The Final EIR addressed impacts to Tribal Cultural Resources with archaeological resources under Cultural Resources above.	*Less than significant impact with mitigation.* See archaeological resource discussion above.
Transportation and Traffic		
Conflict with plan addressing circulation, including transit, bicycle and pedestrian facilities.	*Less than significant impact.* The 2014 Master Plan would facilitate all modes of transportation access to the Campus.	*Less than significant impact.* The 2023 Master Plan Revisions would not substantially impact circulation.
Traffic impacts during construction and operation.	*Significant and unavoidable impact*. Project operation would significantly increase trips on local roadways. Mitigation to address delay at one intersection was identified.	*Potentially significant and unavoidable impact.* Since the total building area could be similar under the 2023 Master Plan Revisions, vehicle trips and associated miles travelled could also be similar; therefore VMT impacts would be less or similar. The Campus is in close proximity to transit and therefore would have fewer VMT impacts then projects located further from transit. Conservatively, despite changes to CEQA to remove delay and levels of service as impacts under CEQA, traffic impacts of the 2023 Master Plan Revisions are still considered significant and unavoidable for the purposes of this addendum. The County has committed to continuing to implement the mitigation measures identified in the Final EIR.
Increase hazards due to geometric design.	*Less than significant impact.* Construction could require roadway restrictions; the mitigation requiring a traffic control plan would address this impact.	*Less than significant impact.* Construction could require roadway restrictions; the mitigation requiring a traffic control plan would continue to address this impact.

Impact	Level of Significance Final EIR	Level of Significance 2023 Master Plan Revisions
Result in inadequate emergency access.	*Less than significant impact with mitigation.* Construction could require roadway restrictions that could affect emergency access; the mitigation requiring a traffic control plan would address this impact.	*Less than significant impact with mitigation.* Construction could require roadway restrictions which could affect emergency access; the mitigation requiring a traffic control plan would continue to address this impact.
Utilities and Service Systems		
Impacts to wastewater treatment, storm water, electricity, solid waste and natural gas.	*Less than significant impact (wastewater treatment, stormwater, electricity and solid waste); significant (natural gas).* Based on developed area and compliance with existing regulations, the Final EIR concludes less than significant impacts to wastewater treatment, storm water, and solid waste. No impacts to electricity were identified. There remains uncertainty with respect to natural gas supplies post-2030 as SoCalGas does not forecast out beyond that time; therefore, availability of natural gas was identified as a potentially significant impact.	*Less than significant impact*. The 2023 Master Plan Revisions would result in similar construction and less developed area as compared to the 2014 Master Plan. Impacts would be similar to those identified in the 2014 FEIR.
Have sufficient water supplies available. (The Final EIR also addressed limited supplies of natural gas.)	*Potentially significant and unavoidable impact.* LADWP indicated that water was available for the Master Plan projects identified in the Final EIR. Mitigation requires further study of major post-2035 projects.	*Potentially significant and unavoidable impact.* The 2023 Master Plan Revisions revision projects would be within the assumptions of the Final EIR and water would be available. Mitigation would continue to require further study of major post-2035 projects. The County is moving away from use of natural gas and use of natural gas is expected to go down in the future.
Impacts with respect to wastewater capacity	*Potentially significant and unavoidable impact.* While local sewer lines may have capacity, the County has no control over sewer capacities and impacts to local sewer lines are considered potentially significant; mitigation requires additional gauging of sewer lines for projects that increase sewer flows and if no capacity is available the County is required to construct new lines to a point where capacity is available.	*Potentially significant and unavoidable impact.* While overall development area could decrease, the 2023 Master Plan Revisions would not substantially change impacts as compared to what was evaluated in the Final EIR.
Wildfire		
Impair emergency response, exacerbate risks, require installation of infrastructure, expose people or structures to risks including downslope flooding or landslides as a result of post-wildfire conditions	*No impact.* The Final EIR addressed fire protection in general in Public Services; the NOP/IS determined that the 2014 Master Plan would not result in impacts related to wildfire.	*No impact.* The project site is located far from wildland areas.

A. AESTHETICS

The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts to aesthetics was evaluated in relation to the Final EIR analysis. Consistent with SB 743, aesthetics impacts do not apply to projects that are located in a Transit Priority Area (TPA) and are defined as set forth in Public Resources Code Section 21099. Per SB 743, aesthetic impacts for such projects are less than significant. The Campus is located within a TPA; the Women's and Children's Hospital site is located adjacent to several transit lines.

(a) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantial adverse effects on a scenic vista?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR identifies no designated scenic highways, corridors, or parkways within the project viewshed, and no recognized scenic vistas were identified within the community; only informal views were identified in which views of the Old General Hospital Building, the Downtown skyline, and local foothill and mountain ridgelines are visible. Informal views from some locations on the Campus may be obstructed by new buildings; however, no designated scenic vista or views would be obstructed or affected. New low-rise buildings would be added to the Campus, consistent in scale and massing with existing buildings; new street trees, and extensive new park-like landscaped spaces would also be added in areas that are now paved and occupied by infrastructure. The 2014 Master Plan resulted in a less than significant impact with respect to scenic vistas.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would result in three new buildings varying in height from

two stories up to six stories as compared to two buildings in the 2014 Master Plan on the Women's and Children's Hospital site that were planned for four to six stories. Impacts of the 2023 Master Plan Revisions would be similar to those of the 2014 Master Plan and would be less than significant.

Conclusion

There would be no new or substantially greater impacts than those identified in the Final EIR and no changes to or additional mitigation is required.

(b) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantially damaging scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR indicates that the Campus is not located within the vicinity of a designated State Scenic Highway (California Scenic Highways Mapping System). During construction, most of the mature trees and the architectural/historical resources on the Campus would be preserved as part of the project. However, the Women's and Children's Hospital, was identified as a historic resource and aesthetically noteworthy because of its architectural design. The 2014 Master Plan included demolition of this building. Mitigation measure MM-CR-3 (see discussion for V. 2014 EIR Impact Determination for Cultural Resources below) would address impacts to scenic resources, but demolition of the Women's and Children's Hospital building was identified to remain a significant and unavoidable visual impact of the 2014 Master Plan.

2023 Master Plan Revisions

Construction and Operation

Conditions have not changed with respect to state-designated scenic highways. The Women's and Children's Hospital has been demolished and the significant impact has occurred.

Conclusion

There would be no new or greater impacts than those identified in the Final EIR and no changes to or additional mitigation is required.

(c) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to: In non-urbanized areas, substantially degrading the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). In an urbanized area, project conflict with applicable zoning and other regulations governing scenic quality?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR identifies the visual setting of the Campus as characterized by a range from low to high visual quality, providing an often-flexible urban design context for new development features. Temporary construction activities would not result in significant changes to visual character, nor would these result in a significant overall reduction in visual quality. New buildings in the 2014 Master Plan were described as generally compatible in architectural form, finishes and scale with existing Campus buildings. The 2014 Master Plan preserved most of the significant architectural/historical resources within the Campus, while adding extensive new landscape elements to create an inviting park-like setting for Campus staff and visitors. Impacts to public views were identified as less than significant. Nonetheless, mitigation measure MM-AES-1 was identified to protect elements of moderately high visual quality in the community, such as vantages within the Campus that offer views of downtown Los Angeles and the San Gabriel Mountains, as appropriate.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master

Plan revisions. Construction activities would be similar to those evaluated in the Final EIR and would similarly have less-than-significant impacts with respect to visual character and quality of public views.

Like the 2014 Master Plan, the 2023 Master Plan Revisions would create a more aesthetic public environment than under existing conditions. It would introduce similar elements that would enhance the public interface along adjacent streets. The 2023 Master Plan Revisions would not substantially degrade the visual character or quality of the site or its surroundings because of height, bulk, pattern, scale, character, and other features; impacts would continue to be less than significant. Mitigation measure MM-AES-1 would continue to be required to further reduce impacts.

Conclusion

The 2023 Master Plan Revisions would not substantially change the aesthetic character of the site as compared to what was evaluated in the Final EIR. Impacts with respect to visual character and quality would be less than significant and similar to those of the 2014 Master Plan and no changes to or additional mitigation is required.

(d) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR describes both the Campus and the surrounding area as in a fully urbanized setting in which there are numerous existing sources of light and glare. These include existing Campus health services buildings and commercial buildings along adjoining streets. The net contribution of project construction activities, when considered in addition to existing sources of light and glare, would be negligible; and no significant project construction impacts related to light, glare, and shadow would occur. The 2014 Master Plan would introduce new buildings and parking areas and new shielded outdoor lighting features that would not significantly alter ambient illumination light levels or result in significant spill light impacts on surrounding land uses. All project lighting features would be installed in accordance with applicable

regulations designed to promote energy efficiency, avoid spill light and glare, and preserve nighttime sky viewing. In addition, project elements would be designed to be compatible with the design character of the setting in which they are being proposed and would receive non-highly reflective finishes and colors. Therefore, the 2014 Master Plan was determined to have a less than significant impact on light and glare.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The lighting needed during construction of the 2023 Master Plan Revisions would generate a similar amount of minor light spillover in the vicinity of the Campus as compared to the 2014 Master Plan and would not substantially change lighting conditions in the vicinity of the Campus. Any construction-related nighttime illumination would be used for safety and security purposes only, would be in specific locations within the site, and would not be experienced by any sensitive, off-site receptors for a long duration. Construction lighting would be limited and directed onto specific locations within construction sites to avoid affecting on-site medical patients and neighboring sensitive uses (located more than 200 feet from the Women's and Children's Hospital site across N. Mission Road in an industrially zoned area and across Zonal Avenue where Central Juvenile Hall is located). Any off-site construction activities that may be necessary to address infrastructure improvements would be the same as for the 2014 Master Plan, would be limited, and would occur during daylight hours. Construction lighting would not adversely affect off-site sensitive receptors. Therefore, artificial light impacts associated with construction of the 2023 Master Plan Revisions would be less than significant. As with the 2014 Master Plan, construction activities for the 2023 Master Plan Revisions would not result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. As such, construction glare impacts would be the same, less than significant.

Similar to the 2014 Master Plan, the 2023 Master Plan Revisions has the potential to introduce new point source lighting, including architectural lighting, security and wayfinding lights, landscape lighting, and visible interior light emanating from the windows of the new multi-story buildings (of similar height to those evaluated in the 2014 Master Plan). Emergency service locations would be interior to the Campus and shielded from adjacent residential neighborhoods. The same type of security lighting and landscape lighting would be used for the 2023 Master Plan Revisions as the 2014 Master Plan and would be similar to the existing lighting. Therefore, the 2023 Master Plan Revisions would not be expected to substantially increase ambient light or cause light spill onto adjacent light-sensitive receptors and impacts would be less than significant, the same as the 2014 Master Plan. Similar to the 2014 Master Plan, the 2023 Master Plan

Revisions would not generate substantial glare from reflected sunlight, and glare impacts would be less than significant, the same as the 2014 Master Plan.

Conclusion

Impacts of the 2023 Master Plan Revisions with respect to light and glare would be less than significant, the same as those of the 2014 Master Plan and no changes to or additional mitigation is required.

B. AGRICULTURAL AND FORESTRY RESOURCES

The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts to agricultural and forestry resources compared to the Final EIR was evaluated in relation to five questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to any of the following:

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

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

(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

(d) Result in the loss of forest land or conversion of forest land to non-forest use?

(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The Campus is located in a developed portion of the City of Los Angeles and is occupied by the LAC+USC Medical Center. The project site is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the 2014 Master Plan would not convert such farmland to

nonagricultural use. Since the 2014 Master Plan would impact farmland conversion impact, it would also not contribute to a cumulative farmland conversion impact. No further analysis was warranted was the Final EIR.

The Campus is not under Williamson Act contract (California Department of Conservation, 2008), nor is it zoned or designated for agricultural use. The project site is in the midst of a developed area with no nearby agricultural land. The 2014 Master Plan had no potential to convert farmland, conflict with agricultural zoning, or lead to other changes in the existing environment that could lead to farmland conversion. Since the 2014 Master Plan had no impact with regard to conflicts with existing land zoned for agricultural use, there was no potential to contribute to a cumulative impact on agriculturally zoned land. No further analysis was warranted in the Final EIR.

The Campus is not zoned as forestland, timberland, or timberland zoned Timberland Production. The Campus is developed and does not contain forestland or timberland. Therefore, the 2014 Master Plan had no potential to conflict with existing zoning or cause rezoning of forest or timberland, no potential to affect forestland or timberland, and no potential for a contribution to a cumulative impact with regard to conversion of forestland or timberland. No further analysis was warranted in the EIR.

The Campus is not located on or near forestland. Therefore, the 2014 Master Plan had no potential to result in the loss or conversion of forestland and would also not contribute to a cumulative impact with regard to forestland conversion. No further analysis was warranted in the Final EIR.

The 2014 Master Plan had not potential to convert farmland or forestland and would not have the potential to result in a secondary impact with regard to farmland or forestland conversion, and therefore no potential to contribute to a cumulative farmland or forestland conversion impact. No further analysis was warranted in the Final EIR.

2023 Master Plan Revisions

Construction and Operation

The land uses on the Campus and surrounding area have not changed since the Final EIR. The Campus is not located on designated farmland or forest land. The 2023 Master Plan Revisions would not convert farmland or forest land, nor would it conflict with existing zoning for agricultural or forestry uses or a Williamson Contract.

Conclusion

As under the 2014 Master Plan, the 2023 Master Plan Revisions would have no impacts with respect to agricultural and forest resources and no mitigation would be required.

C. AIR QUALITY

Air quality impacts of the 2023 Master Plan Revisions were evaluated with regard to the Final EIR. The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts to air quality was evaluated in relation to four questions recommended for consideration by the *State CEQA Guidelines.*

(a) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to conflict with or the potential to obstruct implementation of the applicable air quality plan?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

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

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master

Plan revisions. With the 2023 Master Plan Revisions, the Campus would continue to be consistent with the growth projections in the City's General Plan and the most recent (2020) RTP/SCS and thus consistent with the growth projections in the most recent AQMP (2022). The 2023 Master Plan Revisions would continue to be supportive of RTP/SCS policies and the AQMP Transportation Control Measures related to reducing vehicle trips and increasing density near public transit. Because the 2023 Master Plan Revisions would be consistent with the growth projections in the AQMP and would be supportive of relevant policies and Transportation Control Measures aimed at reducing vehicle trips, the 2023 Master Plan Revisions would have similar impacts related to consistency with the AQMP as the 2014 Master Plan, which would be less than significant.

Conclusion

Impacts of the 2023 Master Plan Revisions related to consistency with the AQMP would be similar to those of the 2014 Master Plan as described in the Final EIR; no changes to or additional mitigation is required.

(b) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region air basin is non-attainment under an applicable federal or state ambient air quality standard?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

The Los Angeles County portion of the South Coast Air Basin is designated nonattainment for the National Ambient Air Quality Standards for ozone and particulate matter less than 2.5 micrometers (PM2.5) and designated nonattainment for the California Ambient Air Quality Standards for ozone, nitrogen dioxide, particulate matter less than 10 micrometers (PM10), and PM2.5.

2014 Master Plan

Construction

During construction, maximum daily project-related criteria pollutant emissions were identified as exceeding SCAQMD regional construction-period thresholds for VOC and NOX. Mitigation measure MM-AQ -1, which would require low-VOC coatings beyond SCAQMD requirements for non-residential uses, would reduce VOC emissions. Mitigation measures MM-AQ-2 and MM-AQ-3, which would require a

cleaner construction equipment fleet (EPA Tier 4 engines when available) and diesel-reduction measures, would reduce NOx and PM emissions from vehicle exhaust. Implementation of Mitigation Measures AQ -1 through AQ-3 would reduce emissions during project construction to below SCAQMD thresholds. Impacts were considered less than significant with mitigation incorporated.

Operation

During operation, maximum daily project-related criteria pollutant emissions over existing conditions were not expected to exceed SCAQMD operations-period thresholds for any pollutant. Similarly, maximum daily project-related criteria pollutant emissions over future no-project conditions are not expected to exceed SCAQMD operations- period thresholds for any pollutant. Consequently, the impact of operations-related emissions from the 2014 Master Plan was considered less than significant.

2023 Master Plan Revisions

Construction

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would result in a similar amount of development on the Campus and maximum daily emissions from construction of the 2023 Master Plan Revisions would not exceed the thresholds for any criteria pollutants. During interim operations of the MHUCC/WMF that overlap with construction of the Psychiatric Sub-acute Facility, maximum daily criteria pollutant emissions would not be greater than those disclosed in the Final EIR because the amount of overlap and peak daily intensities would be similar. The 2023 Master Plan Revisions would also comply with required mitigation measures MM-AQ-1 through MM-AQ-3, which as determined in the Final EIR, would ensure construction emissions would not exceed thresholds of significance. Therefore, the 2023 Master Plan Revisions would not result in a cumulatively considerable net increase of a criteria pollutant. Consequently, construction impacts would be less than significant, the same as under the 2014 Master Plan.

Operation

The 2023 Master Plan Revisions would result in similar building area as compared to that analyzed in the Final EIR and therefore would result in similar building energy consumption and similar motor vehicle trips. Therefore, emissions from operation of the 2023 Master Plan Revisions would be similar to those of the 2014 Master Plan and would not exceed the thresholds of significance for any criteria pollutant. Therefore, the 2023 Master Plan Revisions operational impacts would be less than significant.

Conclusion

Criteria pollutant emissions associated with the 2023 Master Plan Revisions would be similar to those evaluated for the 2014 Master Plan and would be less than significant and no changes to or additional mitigation is required.

(c) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the potential to expose sensitive receptors to substantial pollutant concentrations?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

Sensitive land uses in proximity to the Women and Children's Hospital site (sensitive receptors) include residential uses located about 200 feet southwest of the site across N. Mission Road in an industrially zoned area and the Central Juvenile Hall facilities including recreation areas 200 feet to the north.

2014 Master Plan

Construction

Construction of 2014 Master Plan facilities and improvements alone was not anticipated to result in an elevated health risk to exposed persons because of the short-term nature of construction-related diesel exposure.

Based on localized analysis that conservatively assumed maximum daily construction activities would be concentrated in a one-acre area near offsite receptor locations, localized emissions during construction were calculated as exceeding the applicable Localized Significance Thresholds (LSTs) for NOX, PM10, and PM2.5 before mitigation. Measures MM-AQ-1 through MM-AQ-3 would mitigate localized construction impacts; however, potential emissions of PM2.5 and PM10 during construction would remain significant after mitigation.

Operation

During operation, localized emissions would not exceed LSTs for the project area relative to both existing and future no project conditions. Operations impacts would be less than significant.

Long-term operations were anticipated to increase building square footage, which was anticipated to increase the use of existing and/or introduce new permitted sources on-site. Despite the increased use, health risks associated with 2014 Master Plan buildout was expected to remain below SCAQMD thresholds. Therefore, impacts related to potential project-generated exposure to toxic air contaminants (TACs) on surrounding land uses was identified as less than significant.

With respect to CO hot spots at nearby intersections, implementation of the 2014 Master Plan was anticipated to create congested conditions at various intersections near the project site but was not expected to result in violations of the state or federal 1- or 8-hour CO standards at the three most congested and heavily-trafficked intersections within the project vicinity. Consequently, the Final EIR determined that the 2014 Master Plan did not cause or contribute to new air quality violations, worsen existing violations, or delay timely attainment of CO NAAQS. The impact of traffic from the project on ambient CO levels was considered less than significant. No mitigation was required.

2023 Master Plan Revisions

Construction

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The construction activities for the 2023 Master Plan Revisions would be similar to those of the 2014 Master Plan. Maximum localized emission concentrations during construction activities would be similar to the 2014 Master Plan and therefore could exceed thresholds for NOX, PM10 and PM2.5. Given the size of the Women's and Children's Hospital site and distance to sensitive receptors, it is anticipated that emissions from the 2023 Master Plan Revisions alone would be less than significant, but construction on the remainder of the Campus would continue to have the potential to exceed localized thresholds in the vicinity of the Campus.

Operation

The 2023 Master Plan Revisions would result in similar operational emissions for the Campus as a whole when compared to the 2014 Master Plan. As for the 2014 Master Plan, localized operational emissions for sensitive receptors would not exceed the localized thresholds for NOX, CO, PM_{10}, and $PM_{2.5}$. Therefore, with respect to localized operational emissions, impacts of the 2023 Master Plan Revisions would be less than significant, the same as those of the 2014 Master Plan.

The 2023 Master Plan Revisions would have generally the same uses and activities as the 2014 Master Plan. The same emissions of air toxics would result from maintenance activities and other permitted sources on-

site. As for the 2014 Master Plan, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the land uses in the 2023 Master Plan Revisions. Potential long-term operational impacts associated with the release of TACs from the 2023 Master Plan Revisions uses would be similar to those from the 2014 Master Plan uses and would be less than significant.

The traffic generated under the 2023 Master Plan Revisions would be similar to that generated under the 2014 Master Plan and associated air quality impacts would also be generally the same. Therefore, the 2023 Master Plan Revisions would not cause or contribute to the formation of CO hotspots, and CO concentrations at nearby intersections would remain well below the ambient air quality standards, the same as under the 2014 Master Plan.

Conclusion

Emissions associated with the 2023 Master Plan Revisions on the Campus as a whole would be similar to those evaluated for the 2014 Master Plan. Localized impacts and impacts on sensitive receptors could remain significant during construction; impacts would be less than significant for operation and no changes to, or additional mitigation is required.

(d) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to other emissions such as those leading to odors adversely affecting a substantial number of people?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction

Odors resulting from construction of the 2014 Master Plan facilities and improvements were not identified as likely to affect a substantial number of people because construction activities usually do not emit offensive odors. Given mandatory compliance with SCAQMD rules, no construction activities or materials are proposed that would create a significant level of objectionable odors. As such, potential impacts during short-term construction were identified as less than significant.

Operation

Land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding, none of which were proposed under the 2014 Master Plan. The project does not include any uses identified by SCAQMD as being typically associated with objectionable or nuisance odors. Waste collection areas and disposal for the 2014 Master Plan would be covered and situated away from the property line and sensitive off-site uses. Medical waste would be properly sealed and stored in accordance with applicable rules to ensure that no objectionable medical waste–related odors would be created. The Final EIR did not identify any impacts from nuisance odors. Therefore, potential odor impacts of the 2014 Master Plan was identified as less than significant.

2023 Master Plan Revisions

Construction

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would include similar construction activities as the 2014 Master Plan and would not create or introduce objectionable odors affecting a substantial number of people. Therefore, impacts related to construction odors would be the same as those of the 2014 Master Plan; impacts would be less than significant.

Operation

The 2023 Master Plan Revisions would include generally the same operational uses as the 2014 Master Plan and would not create or introduce objectionable odors affecting a substantial number of people. Therefore, impacts related to operational odors would be the same as those of the 2014 Master Plan; impacts would be less than significant.

Conclusion

The 2023 Master Plan Revisions would have similar emissions, including odor emissions, as compared to the 2014 Master Plan and impacts would continue to be less than significant and no changes to or additional mitigation is required.

D. BIOLOGICAL RESOURCES

The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts to biological resources than analyzed in the Final EIR was evaluated in relation to six questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:

(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS)?

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

(c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

Sensitive and Special Status Species

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

The Final EIR identified no candidate, sensitive, or special-status animal or plant species on the Campus, with the exception of two California black walnut trees which were considered not to provide native habitat

and to not represent a regionally significant population and therefore removal of which (if it were to occur) was considered a less than significant impact.

Operational activities on the Campus, which would not differ significantly from current activities, were not expected to result in significant impacts on bat species that may roost on the project site. Therefore, construction and operation of the facilities and buildings proposed under the 2014 Master Plan were not identified as having an adverse impact on any candidate, sensitive, or special-status animal or plant species. Impacts associated with buildout of the 2014 Master Plan were considered less than significant.

Riparian Areas and Wetlands

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

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

Wildlife Movement

The Campus is located in an urban setting and is not considered to be critical to wildlife movement; there is no natural habitat on-site. Therefore, construction and operational activities proposed under the 2014 Master Plan were not considered to pose substantial barriers or other impediments to wildlife movement. Impacts were identified as less than significant.

Bird species that are protected under the Migratory Birds Treaty Act (MBTA) have the potential to nest in the ornamental vegetation on the Campus. Some bird species that are protected by the MBTA may also nest on existing buildings. Removal of vegetation and the demolition of buildings during construction could result in direct impacts on nests that are protected under the MBTA. Also, high noise levels and dust from construction activity could cause indirect impacts on nests and cause failure. Implementation of MM-BIO-1 and MM-BIO-2 was identified to ensure that the potential impacts of construction activities on

nesting birds that are protected under the MBTA and California Fish and Game Codes would be reduced to a less than significant level.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. There is no new suitable habitat for candidate, sensitive, or special-status species since the Final EIR. The Women's and Children's Hospital site has been roughly graded and is surrounded by construction fencing. Impacts of the 2023 Master Plan Revisions on candidate, sensitive, or special-status species would be the same as the 2014 Master Plan and less than significant, because of lack of suitable habitat. The 2023 Master Plan Revisions could have similar impacts on migratory birds due to the removal of on-site trees. Mitigation Measure MM-BIO-1 and MM-BIO-2 would continue to apply to the 2023 Master Plan Revisions. Therefore, there would be no change in the impacts related to migratory birds; impacts would continue to be less than significant with implementation of mitigation.

Since the Final EIR was certified, no wetlands, riparian habitat, or other sensitive natural community has been established on the Women's and Children's Hospital site or in the vicinity of the site. The 2023 Master Plan Revisions would have no impacts related to riparian habitats or other sensitive natural communities identified in local or regional plans, policies, or regulations or by CDFW or USFWS during construction or operation.

Conclusion

Impacts to biological resources would be the same for the 2023 Master Plan Revisions as evaluated for the 2014 Master Plan in the Final EIR and no changes to or additional mitigation is required.

(e) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

Construction of 2014 Master Plan facilities and structures was identified to result in potential damage to or removal of vegetation on the project site, including native oak trees that have been planted in ornamental areas. While coast live oak trees are not considered special-status plant species, these trees are protected under the Los Angeles County Oak Tree Ordinance. Protected trees include native oaks that measure 8 inches or more in diameter or oaks with multiple trunks, with a combined diameter of 12 inches or more for the largest two trunks measured 4.5 feet above the natural grade. Potential damage to or removal of oak trees that are protected by the Los Angeles County Oak Tree Ordinance would be a significant impact. Implementation of MM-BIO-3 would ensure that potential oak tree removal and resulting replanting per the County's tree protection ordinance, would result in less than significant impacts. Operation of facilities and buildings proposed under the Master Plan, including routine maintenance and pruning of ornamental vegetation and trees, was not expected to result in significant impacts.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. No major land use changes have occurred on the Campus or the surrounding area. The Women's and Children's Hospital site has been cleared; no biological resources exist on the site. The landscape plan incorporated into the 2023 Master Plan Revisions would be similar to those proposed under the 2014 Master Plan. Therefore, like the 2014 Master Plan, the 2023 Master Plan Revisions would not conflict with local policies or ordinances protecting biological resources during construction or operation.

Conclusion

Impacts related to local policies or ordinances protecting biological resources would be the same for the 2023 Master Plan Revisions as evaluated for the 2014 Master Plan in the Final EIR and no changes to or additional mitigation is required.

(f) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Campus and its surroundings are not in or near an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the Final EIR determined that implementation of the 2014 Master Plan would not conflict with any such plans and no impacts would occur during construction or operation.

2023 Master Plan Revisions

Construction and Operation

No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan has been adopted covering the Campus or adjacent areas. Therefore, the 2023 Master Plan Revisions would not conflict with any such plans and no impacts would occur during construction or operation, the same as for the 2014 Master Plan.

Conclusion

Impacts related to adopted habitat plans and natural community conservation plans would be the same for the 2023 Master Plan Revisions as evaluated for the 2014 Master Plan in the Final EIR and no changes to or additional mitigation is required.

E. CULTURAL RESOURCES

The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts to cultural resources was evaluated in relation to the Final EIR, required mitigation measures and three questions recommended for consideration by the *State CEQA Guidelines*. The Final EIR did not

separately address Tribal Cultural Resources (TCRs); TCRs are part of the evaluation of archeological resources.

(a) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of a historical resource as defined in §15064.5?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The 2014 EIR determined that the Master Plan would result in an unavoidable significant adverse impact on historical resources due to the demolition of the Women's and Children's Hospital building, which was determined eligible for listing in the California Register of Historical Resources. MM-CR-2 included photo-documentation of the Women's and Children's Hospital to address the impact, but impacts remained significant.

The Final EIR also determined that impacts to other historical resource due to individual projects under the Master Plan could be significant but would vary, depending on final plans. Mitigation measures MM-CR-1 through MM-CR-7 were identified to reduce but not eliminate impacts. However, the determination as to the extent of impacts and the level to which they can be mitigated was identified as depending on development of final project plans and the extent of potential alterations to the historical resources on the Campus. Impacts were considered to be significant after implementation of mitigation measures.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The Women's and Hospital building has been demolished in anticipation of proposed changes. Therefore, this significant impact has already occurred. The 2023 Master Plan Revisions would

not affect other areas of the Campus and therefore impacts to other resources would remain as identified in the Final EIR.

Conclusion

Impacts to historical resources would be the same for the 2023 Master Plan Revisions as evaluated for the 2014 Master Plan in the 2014 FEIR and no changes to or additional mitigation is required.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?** **(c) Disturb any human remains, including those interred outside of formal cemeteries?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

The Final EIR describes the Campus as within a highly urbanized area and has been subject to physical disruption over since it was first developed. For this reason, it is likely that any resources that may have been present on the property have been disturbed or removed. Nonetheless, previously undiscovered buried archaeological resources could still exist on the property. No known traditional burial sites or cemeteries have been identified on the property.

Construction and Operation

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

The Campus is not located in an area that contains formal or known informal cemeteries. Should human remains be uncovered during construction, mitigation plans would require construction to halt in the area

of discovery, the area to be protected, and no further disturbance to occur, as specified by State Health and Safety Code Section 7050.5. Impacts on human remains, if any, are expected to be reduced to a level of less than significant with implementation of mitigation measure MM-CR-10.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would include the same type of ground-disturbing activities as the 2014 Master Plan, although the exact location and extent may vary. As for the 2014 Master Plan, the possible presence of unknown archaeological resources would result in the same potential for significant impacts to archaeological resources (including Tribal Cultural Resources) and would be subject to the same regulations and mitigation measures, MM-CR-8 and MM-CR-10, which would reduce these impacts to a less- than-significant level, the same as for the 2014 Master Plan.

Conclusion

Impacts to archeological resources (including Tribal Cultural Resources) would be the same for the 2023 Master Plan Revisions as evaluated for the 2014 Master Plan in the Final EIR and no changes to or additional mitigation is required.

F. ENERGY

The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts to energy was evaluated in relation to the Final EIR, required mitigation measures and two questions recommended for consideration by the *State CEQA Guidelines*. The Final EIR did not separately address energy; energy considerations were evaluated in connection with greenhouse Gas Emissions and Utilities.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?** **(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR addressed energy under Utilities. As an essential use, hospital energy use would not be wasteful or inefficient. The 2014 Master Plan included energy-efficient project design features and plans for solar electric power, solar thermal and hot water, as well as ground- source heating for various facilities. These efforts, combined with compliance with Title 24's energy conservation standards for new construction would help to offset increases. SoCalGas has only projected supplies through 2030 and therefore availability of natural gas was identified as a significant impact with respect to utilities; however, this is not an impact related to inefficient or wasteful use of energy – see Utilities below.

2023 Master Plan Revisions

Construction

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The California Green Building Standards Code (CALGreen Code) establishes mandatory measures for new residential and non-residential buildings, which includes requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The 2023 Master Plan Revisions would comply with or exceed the applicable provisions of the Title 24 Building Standards Code and the California Green Building Standards in affect at the time of building permit issuance. The 2023 Master Plan Revisions would be designed to LEED Gold standards.

The 2023 Master Plan Revisions would also use construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-

duty diesel on- and off-road equipment. Therefore, the 2023 Master Plan Revisions would also meet or exceed the required level of waste recycling and reuse rate for construction and demolition debris.

Therefore, as with the 2014 Master Plan, the 2023 Master Plan Revisions would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not preempt future energy conservation. As a result, impacts related to construction energy use with the 2023 Master Plan Revisions would be the same or less than those of the 2014 Master Plan and would be less than significant.

Operation

Operation of the 2023 Master Plan Revisions would utilize energy in the same way as the 2014 Master Plan, for necessary on-site activities and off-site transportation associated with Campus employees, patients, and visitors traveling to and from the site. Just as with the 2014 Master Plan, the amount of energy used would not represent a substantial fraction of the available energy supply in terms of equipment and transportation fuels. The 2023 Master Plan Revisions would also meet or exceed energy standards by incorporating green building measures consistent with the County's Climate Action Plan (CAP); buildings would now be required to meet LEED Gold-level standards. Overall, the 2023 Master Plan Revisions would replace the same aging facilities and infrastructure with new ones providing considerably higher efficiency in terms of energy and water demands. The 2023 Master Plan Revisions would comply with the mandatory measures for new non-residential buildings. The 2023 Master Plan Revisions would also meet or exceed the applicable provisions of Title 24 and the California Green Building Standards in effect at the time of the building permit issuance.

The 2023 Master Plan Revisions would contribute to increasing the overall intensity of land uses on the Campus but would use less energy per square foot of development compared to existing conditions. As a result, impacts would be the same as those of the 2014 Master Plan, less than significant.

Conclusion

Impacts with respect to wasteful use of energy and consistency with applicable renewable energy and/or energy efficiency plans for the 2023 Master Plan Revisions would be similar to the 2014 Master Plan and would be less than significant and no changes to or additional mitigation is required.

G. GEOLOGY AND SOILS

Impacts with respect to geology and soils of the 2023 Master Plan Revisions were evaluated with regard to the Final EIR and required mitigation measures. The potential for the 2023 Master Plan Revisions to result

in new or substantially more adverse significant impacts to geology and soils was evaluated in relation to six questions recommended for consideration by the *State CEQA Guidelines*.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the Project Area. Analysis of the Appendix G questions takes in to account the decision from *CBIA v. BAAQMD*.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:

- **(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:**
  - **i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**
  - **ii) Strong seismic ground shaking?**
  - **iii) Seismic-related ground failure, including liquefaction?**
  - **iv) Landslides?**
- **(b) Result in substantial soil erosion or the loss of topsoil?**
- **(c) Being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed 2023 Master Plan Revisions, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**
- **(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**
- **(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?**
- **(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

Seismic Hazards

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

Because development would be located within a seismically active region, the potential exists for seismic ground shaking. However, the level of ground shaking at a given location depends on many factors, including the size and type of earthquake, the distance from the earthquake, and subsurface geologic conditions. The type of construction also affects how particular structures and improvements perform during ground shaking. The potential levels of ground shaking at the project site could result in significant impacts on future improvements. However, development would be required to adhere to all applicable seismic design requirements and guidelines. Additionally, implementation of structural design mitigation (MM-GEO-1) was required and the Final EIR indicates that impacts related to seismic ground shaking would be reduced to a less-than-significant level.

According to the preliminary geotechnical evaluation prepared for the 2014 Master Plan, the western portion of the Campus is located within an area that is considered susceptible to liquefaction. Other areas of the site that are not indicated on the state map as susceptible could also be subject to liquefaction. Liquefaction and its associated manifestations could cause damage to future project improvements if not mitigated during detailed project design, a potentially significant impact. The potential damaging and significant effects of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving and cracking of pavement due to sand boiling, and the buckling of deep foundations due to liquefaction-induced ground settlement. The Final EIR indicates that mitigation measure MM-GEO-1 would reduce the potentially significant liquefaction hazards to a less- than-significant level.

The potential for future landslides or mudflows to affect developments within the Campus is relatively low. Significant impacts related to landslides or mudflows within the Campus are not anticipated. Slopes

created for future developments within the project area would be designed to reduce the potential for landslides or mudflows. The Final EIR identified this impact as less than significant impact.

Soil Erosion

The Final EIR indicates that construction of 2014 Master Plan facilities and improvements could result in ground surface disruption, including disruptions from grading and excavation activities. Such activities could result in erosion at the project site during construction. However, construction projects that result in ground disturbance of 1 acre or more must apply for a Stormwater General Permit under the National Pollutant Discharge Elimination System (NPDES). All construction is required to follow best management practices (BMPs) as indiacted in MM-GEO-2, to prevent erosion that might move off-site, as required under the Stormwater Pollution Prevention Plan (SWPPP) for compliance with State Water Resources Control Board NPDES Construction General Permit 2009-0009. In accordance with existing regulations, the SWPPP would be prepared to identify BMPs that would be implemented to prevent construction area runoff and sediment from entering the storm drain system. Implementation of BMPs would ensure that sediment would be confined to the construction area and not transported off-site. As a result, impacts of the 2014 Master Plan were identified as less than significant. During long-term operation of developments and improvements on the Campus, provisions for surface drainage and incorporation of appropriate BMPs (filtration, runoff-minimizing landscaping for common areas, energy dissipaters, inlet trash racks, and water quality inlets) would reduce the potential for soil erosion at the site. Additionally, stormwater and low impact development (LID) features (i.e., bioretention and wetland/detention areas) were anticipated to also minimize runoff and the potential for soil erosion. Therefore, operational impacts were identified as less than significant.

Soil Conditions

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

Given the reported depth of groundwater in the project area and the anticipated depth of construction activities, groundwater was identified as having to potential to have a significant impact on excavations for future project improvements. Wet or saturated soil encountered in excavations can cause instability and present a constraint to the construction of foundations. Structural design and mitigation techniques reduce

impacts related to liquefaction. Therefore, liquefaction impacts were considered less than significant with mitigation.

Because of the presence of potentially compressible/collapsible soils at the site, the potential exists for differential settlement to cause damage to project improvements. The potential impacts of settlement would be considered significant without appropriate mitigation implemented during detailed project design and construction. Mitigation (MM-GEO-1), including removal of compressible/collapsible soils and replacement with compacted fill, would reduce potential impacts to less-than-significant.

The near-surface soils at the project site are composed predominantly of sandy, coarse-grained materials. These soils typically have a low expansion potential. However, clayey soils may be present in areas that were not observed. If construction activities occur on soils that are known to be potentially expansive, the impact on proposed future improvements could be significant. The Final EIR indicates that implementation of mitigation (MM-GEO-1) would reduce potential impacts from expansive soils to a less than significant level.

Use of Septic Tanks

The Campus is in an urbanized area with wastewater infrastructure already in place. The 2014 Master Plan facilities were anticipated to connect to existing off-site City of Los Angeles infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, the no impacts with respect to septic systems were identified.

Paleontological Resources

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

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

2023 Master Plan Revisions

Construction and Operation

Seismic Hazards and Soil Conditions

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. Potential impacts related to ground rupture, earth shaking and liquifiable or unstable soils are impacts of the environment on the project; the project would not exacerbate this impact. Mitigation measures MM-GEO-1 and MM-GEO-2 would continue to be implemented – they are generally required by existing regulations.

There are no slopes on the Women's and Children's Hospital site that could result in the potential for landslides and mudflows. Therefore, the impacts related to landslides and mudflows for the 2023 Master Plan Revisions would be less than significant, the same as for the 2014 Master Plan.

Soil Erosion

The 2023 Master Plan Revisions would be required to comply with the County NPDES permit and implement the SWPPP for erosion control. It would also implement BMPs to address water- and wind-related erosion and would include relatively gentle slopes. Therefore, like the 2014 Master Plan, potential soil erosion impacts during construction would be less than significant. BMPs related to ongoing drainage design and maintenance practices would also be included in the SWPPP and implemented to reduce soil erosion during operation of the 2023 Master Plan Revisions. The design of the 2023 Master Plan Revisions would also address soil erosion through design procedures such as appropriate surface drainage design of roadways and facilities to provide for positive surface runoff, the same as included in the 2014 Master Plan. It would also comply with the County's LID ordinance. Therefore, impacts would be the same as those of the 2014 Master Plan; impacts related to soil erosion and loss of soil would be less than significant.

Use of Septic Tanks

As for the 2014 Master Plan the 2023 Master Plan Revisions would connect to the existing sewer system and would have no impact related to septic tanks and alternative waste disposal systems.

Paleontological Resources

Construction of the 2023 Master Plan Revisions could result in similar potentially significant impacts on paleontological resources and would be subject to the same mitigation measure (MM-CR10), which would reduce these impacts to a less-than-significant level.

Conclusion

Impacts related to seismic activity, soil conditions, slopes and erosion would be similar for the 2023 Master Plan Revisions as evaluated for the 2014 Master Plan in the Final EIR and no changes to or additional mitigation is required.

H. GREENHOUSE GAS EMISSIONS

Greenhouse gas emissions associated with the 2023 Master Plan Revisions were evaluated based on a review of the Final EIR. The potential for the 2023 Master Plan Revisions to result in new significant impacts related to greenhouse gas emissions was evaluated in relation to two questions recommended for consideration by the *State CEQA Guidelines.*

Under CEQA, project evaluation of GHG emissions can "tier off" a programmatic analysis of GHG emissions, such as Los Angeles County's CAP, which meets the *State CEQA Guidelines* Section 15183.5 requirements for a qualifying programmatic analysis. The County has also adopted Title 31 of the County's Code of Ordinances (the Los Angeles County Green Building Code), which adopts by reference the CALGreen Code except as modified by Title 31. In addition, the County of Los Angeles General Plan provides recommendations for emission reduction strategies for GHG emissions. As such, if a project is designed in accordance with these policies and regulations, it would result in a less-than-significant impact, because it would be consistent with the overarching local and regional plans and regulations for reducing GHG emissions.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?** **(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

Emissions

Long-term operation of 2014 Master Plan facilities was anticipated to result in GHG emissions from fuel combustion (i.e., from on-road motor vehicles traveling to and from the Campus); natural gas, electricity, and water consumption; and wastewater and solid waste generation. Total annual GHG emissions due to the 2014 Master Plan was calculated as exceeding the 3,000 MT CO2e threshold, resulting in a significant impact prior to mitigation. Anticipated buildout under the 2014 Master Plan was calculated to be 37,281 MT. In addition to implementation of MM-GHG-1 and project-specific design features, actions undertaken by the state and local governments will further reduce project-related GHGs in the future. Nonetheless, net project GHG emissions would continue to exceed the South Coast Air Quality Management District (SCAQMD) 3,000 MT significance threshold after incorporation of mitigation measures. As such, this impact was considered significant and unavoidable.

Plans and Policies

By adopting all feasible project design and mitigation measures (MM-GHG-1) to reduce GHG emissions, the 2014 Master Plan was determined to be consistent with and not frustrate any AB 32 Scoping Plan measures, nor was it determined to be inconsistent in any way with the AB 32 goal of reducing state-wide GHG emissions to 1990 levels by year 2020. As such, the 2014 Master Plan was determined to not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. The impact was considered less than significant with mitigation measure MM-GHG-1 incorporated.

2023 Master Plan Revisions

Construction and Operation

Emissions

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. Total emissions for the Campus as a whole including the 2023 Master Plan Revisions, would continue to exceed the SCAQMD 3,000 MT threshold and therefore emissions would be similar to the 2014 Master Plan and conservatively considered significant.

Plans and Policies

The 2023 Master Plan Revisions' construction GHG emissions would be similar to those evaluated in the Final EIR and would be consistent with CAP GHG reduction strategies as applicable. As a result, the 2023 Master Plan Revisions would not conflict with achievement of the County's GHG emissions reduction target. The net annual operational GHG emissions from the 2023 Master Plan Revisions would be similar to the 2014 Master Plan. The 2023 Master Plan Revisions would be consistent with applicable CAP measures and RTP/SCS policies aimed at reducing GHG emissions, which would minimize the increase in GHG emissions that would otherwise occur without implementation of the various sustainability, energy efficiency, water efficiency, solid waste, and transportation reduction measures. The 2023 Master Plan Revisions would be designed to LEED Gold standards. Therefore, the 2023 Master Plan Revisions would not conflict with the County's ability to achieve the CAP target reduction and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. The 2023 Master Plan Revisions would incorporate the same mitigation measure (MM-GHG-1) as the 2014 Master Plan, which would serve to reduce project related GHG emissions.

Conclusion

Impacts related to GHG emissions would be similar for the 2023 Master Plan Revisions as compared to those for the 2014 Master Plan, and impacts related to GHG emissions are still considered to remain significant. Impacts related to plans and policies would be less than significant and no changes to or additional mitigation is required.

I. HAZARDS AND HAZARDOUS MATERIALS

Hazards and hazardous materials of the 2023 Master Plan Revisions were evaluated based on a review of the Final EIR. The potential for the 2023 Master Plan Revisions to result in new or substantially more

adverse significant impacts related to hazards and hazardous materials was evaluated in relation to seven questions recommended for consideration by the *State CEQA Guidelines*. Hazardous waste can pose a potential or substantial hazard to human health or the environment when improperly managed. Designated hazardous waste possesses at least one of four defined characteristics–ignitability, corrosivity, reactivity, or toxicity–or appears on special U.S. Environmental Protection Agency lists.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:

- **(a) Creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
- **(b) Creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**
- **(c) Emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**
- **(d) Being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

Routine Transport

The Final EIR evaluates construction which involves the routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and caulking. Given that 2014 Master Plan facilities would be required to comply with applicable regulations, such as the RCRA, Department of Transportation Hazardous Materials Regulations, and local CUPA regulations, and given the small amounts of hazardous materials that would be used during the construction phase, the Final EIR determined that the 2014 Master Plan would not be expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Accidents and Release of Hazardous Materials and Contaminated Site

Site buildings designated for demolition may contain asbestos-containing materials (ACM) and lead-based paint (LBP) both are considered potential environmental concerns (PECs). The presence of thermal system

insulation (TSI), which is in fair condition within the tunnel located between General Hospital and the pharmacy, is also a PEC. Additionally, indications of Underground Storage Tanks (USTs) were observed during site reconnaissance near the General Hospital, Central Plant (East), Central Plant (West), and the Women's and Children's Hospital. The presence of USTs at the site was identified as a PEC. Monitoring wells, indicating groundwater contaminated with petroleum hydrocarbons, were observed north of General Hospital in an area with a known open remediation process. This is indicative of a PEC.

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

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

Construction activities could result in exposure of construction personnel to hazardous wastes that may be encountered or disturbed during construction. Implementation of mitigation measures MM-HAZ-1 through MM-HAZ-3 were identified and determined to reduce the potential construction impacts related to hazardous wastes to a less-than-significant level.

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

Operation of future facilities and buildings on the Campus over the 2014 Master Plan span of 25 years could result in the use of solvents, cleaning agents, paints, pesticides, diesel, petroleum fuels, and batteries. These products would be used in small amounts, and any spills that may occur would be limited in scope and cleaned up soon after the occurrence.

Additionally, all hazardous materials would be handled in accordance with all applicable rules and regulations. Biomedical wastes would be handled and transported for disposal during operation of future facilities. Current safety protocols for such materials at the Medical Center Campus would be carried

forward into the operation of future facilities, and the risk due to the release of biomedical wastes into the environment would be minimal. Therefore, operation of Master Plan facilities was determined to result in a less-than- significant impact related to hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

The PECs identified in for the Campus generally do not pose a significant hazard to or occupants of existing buildings unless the sites are disturbed during construction and hazardous materials are released into the environment. Therefore, operation of future facilities was not expected to result in significant increased hazards to the public or the environment due to the proximity of those facilities to existing PECs and hazardous materials sites.

Hazardous Emissions Near Schools

The Final EIR determined that impacts due to exposure to or disturbance of hazardous materials or wastes would generally be limited to the Campus. Furthermore, any hazardous waste being hauled to and from the Campus would have to be secured and contained to prevent its release, in accordance with existing federal and state regulations for the hauling of such waste. Given this fact, and because development under the 2014 Master Plan would comply with all applicable regulations, impacts on nearby schools was determined to be less than significant. Additionally, implementation of mitigation measures MM-HAZ-1 through MM-HAZ 3 was determined to ensure that no adverse impacts on nearby schools would occur. Operation of Master Plan facilities could result in the use of solvents, cleaning agents, paints, pesticides, diesel, petroleum fuels, and batteries. Although the Campus boundary is within 0.25 mile of the Bravo Medical Magnet High School, hazardous materials would generally be used in small amounts, and any spills that may occur would be limited in scope and cleaned up soon after the occurrence. Additionally, it is expected that all hazardous materials would be handled in accordance with all applicable rules and regulations. Therefore, operation of the 2014 Master Plan was determined to result in a less-than-significant impact.

2023 Master Plan Revisions

Construction

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would use the same construction methods as the 2014 Master Plan. Therefore, demolition, grading, and excavation would result in the same potential impacts related to accidental upset and release of hazardous materials into the environment. The 2023 Master Plan Revisions would continue to be required to implement Mitigation measures MM-HAZ-1 through MM-

HAZ-3, which would reduce impacts to less-than-significant levels, just as they would for the 2014 Master Plan.

Operation

Similar to the 2014 Master Plan, operation of the 2023 Master Plan Revisions would require the storage, use, and disposal of limited quantities of hazardous materials and waste routinely used in hospitals and related facilities. The potential for upset and accident conditions resulting in the release of these materials is low and related impacts are considered less than significant for the 2023 Master Plan Revisions, the same as for the 2014 Master Plan.

Conclusion

Impacts related to hazardous materials management, upsets and accidents, hazardous materials near schools and hazardous sites would be similar for the 2023 Master Plan Revisions as compared to those for the 2014 Master Plan as identified in the 2014 Final FEIR and no changes to or additional mitigation is required.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:

(e) Being located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the Project Area?

(f) Impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan?

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

Airport Proximity

The Campus is not located within two miles of an airport; the nearest airport is the San Gabriel Valley (El Monte) Airport, more than 9 miles from the Campus.

Emergency Response Plans

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

The Final EIR acknowledged that build-out of the 2014 Master Plan would increase traffic congestion around the Campus, no significant impacts during project operation were identified because the Master Plan would allow for adequate access through and to the project site.

Wildfire

Wildfire-related issues are addressed under **Section T**, **Wildfire**, below.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions.

The nearest airports remain more than two miles away; the Campus is more than 9 miles from the nearest airport, San Gabriel Valley (El Monte) Airport.

The 2023 Master Plan Revisions would use the same construction methods on the same site as the 2014 Master Plan and the same regulations would continue to apply. As with the 2014 Master Plan, the 2023 Master Plan Revisions would implement on-site provisions for public safety, including plans to address on-site emergency incidents, and would not adversely affect existing emergency access routes. During construction, adjacent streets may be temporarily affected due to construction activity, such as temporary lane closures, as with the 2014 Master Plan. Such occurrences would be implemented in accordance with a

construction traffic management plan, as discussed in Section Q Transportation below. Because the 2023 Master Plan Revisions would include the same safety features and regulatory compliance as the 2014 Master Plan, it also would avoid the need to generate new emergency plans beyond those that would normally be implemented to address on-site emergency situations during construction. Therefore, the 2023 Master Plan Revisions would avoid adverse impacts regarding the implementation of existing emergency response plans or emergency evacuation plans. Operation of the 2023 Master Plan Revisions would similarly comply with applicable regulations and would not be expected to create a significant hazard to the public or environment and impacts would be less than significant.

Implementation of the 2023 Master Plan Revisions would not adversely affect existing emergency response plans or emergency evacuation plans, just like the 2014 Master Plan. Impacts would be less than significant, the same as for the 2014 Master Plan.

Wildfire

Wildfire-related issues are discussed under **Section T, Wildfire**, below.

Conclusion

Impacts related to airport safety and emergency response plans would be similar for the 2023 Master Plan Revisions as compared to those for the 2014 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

The potential for wildland fires is addressed in **Section T, Wildfire**, below.

J. HYDROLOGY AND WATER QUALITY

Hydrology and water quality impacts of the 2023 Master Plan Revisions were evaluated in relation to the Final EIR. The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts related to hydrology and water quality was evaluated in relation to five questions recommended for consideration by the *State CEQA Guidelines*.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the Project Area. Analysis of the Appendix G questions in this impact analysis will apply to the

decision from *CBIA v. BAAQMD*. The following analysis recaps the Final EIR; potential impacts of the environment on a project are evaluated in light of the *CBIA v. BAAQMD* decision.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(a) Violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?** **(b) Substantially decreasing groundwater supplies or interfering substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

Water Quality Standards

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

The Final EIR determined that once the 2014 Master Plan was operational, materials such as fuels or solvents may be stored on-site, similar to existing conditions. This was not anticipated to be a source of polluted stormwater runoff or dry-weather runoff. As under existing conditions, the Campus would be required to continue to adhere to all applicable regulations.

Groundwater

The Final EIR indicates that any groundwater seepage encountered during construction would be mitigated, as needed, by constructing small drainage swales from the base of the excavations to temporary

sump pits or stormwater/low impact development (LID) features on-site. Any discharges of groundwater during construction would be in compliance with applicable NPDES permit requirements. The 2014 Master Plan would also comply with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous materials to reduce the potential for a release of contaminants into the groundwater as a result of project construction. Thus, construction activities would not degrade groundwater quality or interfere with recharge. Water use may temporarily increase to a limited extent during the construction phase. Therefore, construction-phase impacts would be less than significant.

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

2023 Master Plan Revisions

Construction

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would use the same construction methods as the 2014 Master Plan and construction activities could result in accidental spills or disposal of potentially harmful materials that could wash into and pollute surface waters or groundwater. These activities would expose soils for a limited time, allowing for possible erosion and sediments to enter into sheet flow runoff, which could enter the existing storm drain system untreated. The 2023 Master Plan Revisions would be required to obtain the same permits as the 2014 Master Plan. Compliance with these permits and requirements would prevent a substantial violation of water quality standards and minimize the potential for

contributing additional sources of polluted runoff during construction, just as it would for the 2014 Master Plan.

As with the 2014 Master Plan, the existing regulations, programs, and policies would ensure that water- and wind-related erosion from 2023 Master Plan Revisions construction would be confined to the construction area and not transported off site. They would therefore ensure construction activities would not degrade the surface water quality of receiving waters to levels below standards considered acceptable by the Los Angeles RWQCB and/or other regulatory agencies or affect the beneficial uses of receiving waters. This would also result in no exceedance of water quality standards during construction of the 2023 Master Plan Revisions, including TMDL limits applicable to the Dominguez Channel, in the same way as the 2014 Master Plan.

The potential for any spill or release of construction-related chemicals during construction of the 2023 Master Plan Revisions would be the same as under the 2014 Master Plan, that is, generally small because of the localized, short-term nature of the releases. The same NPDES Construction General Permit and SWPPP measures required for the 2014 Master Plan would ensure that these types of materials would prevent a spill or release from the 2023 Master Plan Revisions. Therefore, the potential soil erosion and sedimentation impacts during construction of the 2023 Master Plan Revisions would be less than significant, just like the Final EIR determined for the 2014 Master Plan.

Operation

Operation of the 2023 Master Plan Revisions would be similar to conditions under the 2014 Master Plan. It would use the same landscaping strategies, reduce the amount of impervious surfaces, incorporate LID measures, and adhere to the same regulations regarding runoff. Accordingly, operation of the 2023 Master Plan Revisions would not result in a violation of any water quality standards or waste discharge requirements, would not create substantial additional sources of polluted runoff, and would not substantially degrade water quality.

As with the 2014 Master Plan, the 2023 Master Plan Revisions would increase water demand compared to existing conditions due to the intensified use of facilities, increased number of employees and patients, and greater amount of landscaping on the Campus. The 2023 Master Plan Revisions would result in similar demand for water as compared to the 2014 Master Plan. The same kind of code-compliant water fixtures and the same type of LID features would be included, and the same kind of drought-resistant and California native plants would be used for the 2023 Master Plan Revisions. As such, the 2023 Master Plan Revisions would increase groundwater recharge on the site and reduce off-site discharge of stormwater to an even greater extent. The 2023 Master Plan Revisions would not require any substantial additional

withdrawal of groundwater to meet water demand directly on site, the same as described for the 2014 Master Plan. Impacts would be less than significant for 2023 Master Plan Revisions, just as they would be for the 2014 Master Plan.

Conclusion

Impacts related to water quality, waste discharge and groundwater would be similar for the 2023 Master Plan Revisions as compared to those for the 2014 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(c) Substantially altering the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:** **(i) result in substantial erosion or siltation on- or off-site?** **(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?** **(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?** **(iv) impede or redirect flood flows?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR determined that the 2014 Master Plan would not substantially alter the existing drainage pattern of the site or result in substantial erosion or siltation on- or off-site. Standard construction-phase BMPs would decrease the potential for any significant erosion or sedimentation from soil disturbance associated with construction of the project. In addition, standard construction practices related to erosion and sediment control would be required as part of the permitting process. Construction-related erosion and sedimentation impacts resulting from soil disturbance would be less than significant after implementation of the SWPPP (see mitigation measure MM-HYD 1) and the BMPs required to control erosion and sedimentation.

The 2014 Master Plan included drought-tolerant and California native plants within pervious areas of the Campus. Additionally, proposed stormwater and LID features (i.e., bioretention and wetland/detention areas) included vegetation. Although the lawn areas were limited in area, agricultural crops were to be encouraged, and a green roof was proposed for use as an urban farm. The use of plant species with high to moderate water needs, according to Water Use Classifications of Landscape Species III, was to be limited and restricted to similar water-use areas. Routine structural BMPs to be used as part of the 2014 Master Plan included filtration, runoff-minimizing landscaping for common areas, energy dissipaters, inlet trash racks, and water quality inlets. Therefore, long-term impacts on drainage patterns across the project site that could result in substantial erosion and siltation on- or off-site were determined to be less than significant after implementation of mitigation measure MM-HYD-1 and BMPs to control erosion and sedimentation.

The rate or amount of surface runoff resulting from project construction activities was determined to be similar to the amount under existing conditions. During construction, the pervious nature of the Campus was not anticipated to be significantly altered. As such, the 2014 Master Plan was determined to not result in a substantial increase in the rate or amount of surface runoff or flooding on- or off-site. Impacts were determined to be less than significant. With the increased pervious (landscape) areas (increase from 5% pervious to 25% pervious on the Campus) and use of LID features, the amount of stormwater runoff via surface sheet flow and the storm drain system was anticipated to decrease as a result of the 2014 Master Plan. As such, the 2014 Master Plan would not result in a substantial increase in the rate or amount of surface runoff or result in flooding on- or off-site. Impacts were determined to be less than significant.

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

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would require similar grading (the Women's and Children's Hospital site has already been graded) and excavation for building foundations as the 2014 Master Plan, which could affect drainage on the sites of specific components but would not substantially alter the existing drainage pattern of the site or result in substantial erosion or siltation. The same standard construction-phase BMPs for compliance with NPDES requirements, including a Construction General Permit and SWPPP, would decrease the potential for any significant erosion or sedimentation from soil disturbance associated with construction, so any erosion and sedimentation would be localized and temporary. With the implementation of these measures to control erosion and sedimentation, construction-related erosion and sedimentation impacts resulting from soil disturbance would be less than significant for the 2023 Master Plan Revisions, the same as for the 2014 Master Plan.

For each project component, the County is required to identify and implement appropriate LID compliance features and practices and structural BMPs. Therefore, 2023 Master Plan Revisions operations would have less-than-significant impacts related to erosion and sedimentation, the same as for the 2014 Master Plan.

As with the 2014 Master Plan, neither construction nor operations would substantially alter existing topography, affect the course of any streams or rivers, or increase surface runoff in a manner that would result in flooding. Therefore, the impacts on existing drainage would be less than significant, the same as for the 2014 Master Plan.

Like the 2014 Master Plan, the 2023 Master Plan Revisions would increase the pervious area, include an integrated stormwater management approach, and implement County LID requirements, thereby minimizing the need to detain flows on site. The volumes of runoff discharge to the County's storm drain system following buildout of the 2023 Master Plan Revisions would be similar or reduced compared to the 2014 Master Plan and the existing condition. Therefore, impacts of the 2023 Master Plan Revisions related to stormwater capacity and quality would be the same as under the 2014 Master Plan, less than significant.

Conclusion

Impacts related to erosion and siltation, runoff and flooding, and stormwater capacity and quality would be similar for the 2023 Master Plan Revisions as compared to those for the 2014 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?** **(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

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

The Campus is not located within a potential inundation area resulting from a dam failure.

The Campus is approximately 19 miles inland from the Pacific Ocean. It is not within a potential tsunami inundation area or seiche or landslide/mudslide hazard zone. The Final EIR determined that no impact would occur during construction or operation.

With the increased pervious (landscape) areas (increase from 5% pervious to 25% pervious on the Campus) and use of LID features, the groundwater recharge under the 2014 Master Plan could increase, and significant impacts related to a water quality control plan and/or sustainable groundwater management plan were not anticipated.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. Because of the site location, the 2023 Master Plan Revisions would have no impacts with respect to flood hazard, tsunami, seiche, or associated risk of release of pollutants, the same as the 2014 Master Plan.

As with the 2014 Master Plan, the 2023 Master Plan Revisions would not directly affect groundwater resources, and indirect demands on local groundwater supplies would not exceed available supplies; the 2023 Master Plan Revisions also would comply with LID regulations and would not obstruct implementation of a water quality control plan or sustainable groundwater management plan and therefore impacts would be less than significant.

Conclusion

Impacts with respect to flood hazards, tsunami, seiche and risk of release of pollutants and impacts associated with a water quality control plan would remain similar to those identified in the Final EIR and no changes to or additional mitigation is required.

K. LAND USE AND PLANNING

Land use and planning impacts of the 2023 Master Plan Revisions were evaluated in light of the Final EIR. The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts related to land use and planning was evaluated in relation to two questions recommended for consideration by the *State CEQA Guidelines.*

(a) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the potential to physically divide an established community?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The 2014 Master Plan included development of new or renovation of existing office space for medical uses, retail space, open space, parking facilities, and possibly some workforce housing on the Campus. Although construction activities on the Campus could result in off-site impacts, all proposed development and facilities that could occur under the 2014 Master Plan would be constructed within the existing boundaries of the Campus. No new structures were proposed that would result in the demolition of residential uses in the surrounding neighborhood or divide an established neighborhood. Therefore, the temporary land use construction impacts were determined to be less than significant. During operation, proposed facilities are

medically related in nature and would be generally compatible with existing uses on the Campus as well as land uses in the surrounding area. Additionally, proposed retail services and medically related services and open spaces would benefit the surrounding community, especially nearby residential neighborhoods. No surrounding residential neighborhoods would be divided, and no off-site residential buildings would be displaced as a result of implementation of the proposed Master Plan. Therefore, the Final EIR determined that no significant impacts would occur related to dividing a community.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would occur on the same site and would redevelop a portion of the Campus with uses consistent with the existing Medical Center use.

Conclusion

The 2023 Master Plan Revisions would not physically divide an established community and would result in no impact related to physical division of an established community, the same as the 2014 Master Plan and no changes to or additional mitigation is required.

(b) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to causing a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR indicates that buildout of the 2014 Master Plan would result in significant impacts to historical resources and traffic and consequently would conflict with some goals of the Northeast Community Plan (see Table 3.9-1 in the Final EIR). However, given the Master Plan would be consistent with most local land use plan policies and because the Medical Center Campus is not subject to the city's

land use regulations, the Final EIR determined that the 2014 Master Plan would not result in a significant land use impact due to conflicts with applicable land use plans, policies, or regulations.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would have similar land uses as the 2014 Master Plan and the existing conditions. It would also be consistent with the plans analyzed in the Final EIR.

Conclusion

There would be no change in the impacts related to consistency with applicable land use plans, policies, and regulations; impacts would continue to be less than significant and no changes to or additional mitigation is required.

L. MINERAL RESOURCES

The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts to mineral resources was evaluated in relation to the Final EIR and two questions recommended for consideration by the *State CEQA Guidelines.*

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?** **(b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR indicates that the Campus is not located in the administrative boundaries of an oil field. One active oil well, was identified near the south end of the Campus along Marengo Street. The Campus is not identified as a locally important mineral resource discovery site in local plans, including the conservation element of the general plan, specific plan, or other land use plan. As a consequence, no adverse impacts to mineral resources were identified in the Final EIR.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. There are no known mineral resources on the Campus. The 2023 Master Plan Revisions would not be located in the immediate vicinity of the active oil well along Marengo Street; thus, no adverse impacts on the existing oil well are anticipated. No other mineral resources are located in the immediate vicinity of the Campus and proposed new facilities.

Conclusion

Impacts of the 2023 Master Plan Revisions would be the same as those of the 2014 Master Plan, with no impacts on mineral resources of value to the region and the residents of the state and no mitigation is required.

M. NOISE

The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts related to noise was evaluated in relation to the Final EIR and three questions recommended for consideration by the *State CEQA Guidelines.*

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?** **(b) Generation of excessive groundborne vibration or groundborne noise levels?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction

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

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

Vibration

Heavy construction equipment has the potential to produce groundborne vibration levels that are perceptible to people in the surrounding area. Due to the proximity of proposed construction areas to both off-site and on-site sensitive receptors, it does not appear practical to avoid the operation of heavy construction equipment within 111 feet of these receptors, therefore the impact would be significant. While

MM-NOI-6 would reduce construction vibration levels, it would not eliminate the predicted impacts entirely; therefore, construction vibration impacts are considered significant and unavoidable.

Operation

Noise impacts from the parking lots and emergency vehicles associated with the 2014 Master Plan were determined to be less than significant.

The Final EIR indicates that noise generated by large, organized events would have the potential to increase ambient noise levels and exceed the applicable standards, especially during concerts or when other forms of amplified sound are used (public address systems, bullhorns, etc.), which was identified as a significant impact despite mitigation measure MM-NOI-5 that would reduce but not eliminate the impact.

Traffic as a result of the 2014 Master Plan would increase noise levels in the Campus vicinity by less than 3 dB CNEL adjacent to all roadways. Therefore, the traffic noise impact was determined to be less than significant.

New on-site mechanical equipment has the potential to produce a substantial permanent increase in ambient noise levels at nearby off-site noise-sensitive receptors, which would be a potentially significant impact; Mitigation measure MM-NOI-4 would reduce this impact to a less than significant level.

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

Under the 2014 Master Plan, the at-grade helipad would be located at an unidentified new location within the Campus. However, it was not anticipated that this change would lead to any increases in the overall number of landings at the site, or to the typical flight paths utilized by incoming helicopters. In addition, individual landings and on-site helicopter movements are relatively short in duration. For these reasons, the long-term average noise levels generated by helicopters were expected to be relatively low compared to other existing noise sources and were not expected to change significantly as a result of the 2014 Master Plan. Therefore, the noise impact associated with the helipads was determined to be less than significant.

Vibration

Operation of the 2014 Master Plan would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the parking areas. Groundborne vibration generated at these sources would be similar to that of existing sources. Maximum potential vibration levels from all 2014 Master Plan operational sources at the closest off- site buildings would be up to 0.01 inch per second PPV and would be less than the significance threshold of 0.04 inch per second PPV for perceptibility. Therefore, the Final EIR determined that operational groundborne vibration impacts would be less than significant.

2023 Master Plan Revisions

Construction

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. Construction of the 2023 Master Plan Revisions near the existing on-site hospital users would use the same equipment and methods and be in the same location as under the 2014 Master Plan. The building styles and configuration could be different but would be roughly the same size and require the same amount of time to construct. Construction of the 2023 Master Plan Revisions would require the use of the same type of mobile heavy equipment and methods in the same general locations. Increased noise levels at sensitive receptors are expected to be generally the same as under the 2014 Master Plan and could exceed established thresholds.

Even with implementation of mitigation measure MM-NOI-1, construction noise associated with the 2023 Master Plan Revisions would continue to be above established thresholds in some locations, the same as under the 2014 Master Plan. Therefore, impacts related to construction noise are considered to continue to be significant and unavoidable for the 2023 Master Plan Revisions.

Vibration

In the same way as the 2014 Master Plan, the 2023 Master Plan Revisions could include the use of heavy-duty construction equipment as close as 100 feet to occupied on-site operating rooms, exposing them to vibration levels of 0.008 inch per second PPV (the level established for the protection of operating rooms and other uses with sensitive equipment and systems). The 2023 Master Plan Revisions would also incorporate mitigation measure MM-NOI-6, described above for the 2014 Master Plan. While MM-NOI-6 would reduce construction vibration levels, it may not eliminate the predicted impacts entirely. Therefore,

construction vibration impacts continue to be considered significant and unavoidable for the 2023 Master Plan Revisions, the same as determined in the Final EIR for the 2014 Master Plan.

Operation

Operational traffic for the 2023 Master Plan Revisions would be the same as under the 2014 Master Plan, or marginally lower due to the reduced size of the 2023 Master Plan Revisions. The Final EIR determined that the increase in noise related to project-generated traffic would be less than 3 dBA, which would be the same for the 2023 Master Plan Revisions. Therefore, 2023 Master Plan Revisions operational traffic noise impacts would be less than significant, the same as those for the 2014 Master Plan.

Helicopter operations would not be affected by the 2023 Master Plan Revisions and impacts would continue to be less than significant as identified in the Final EIR.

There would remain the potential for organized events on the Campus (although not on the Women's and Children's Hospital site), which would continue to have the potential to increase ambient noise levels; the impact would continue to be potentially significant despite mitigation measure NM-NOI-5 that would reduce but not eliminate the impact.

The operation of mechanical equipment such as air conditioners, fans, and related equipment for the 2023 Master Plan Revisions would be the same as for the 2014 Master Plan, which may generate audible noise levels at the same levels as determined in the Final EIR. The 2023 Master Plan Revisions would implement MM-NOI-4, that would reduce noise levels from fixed mechanical equipment to a less than significant level, as reported in the Final EIR.

Vibration

Stationary mechanical and electrical equipment and passenger vehicle circulation would be the same for the 2023 Master Plan Revisions as for the 2014 Master Plan. Like the 2014 Master Plan, vibrations generated from these sources would be similar to that of existing sources, with maximum potential vibration levels from all operational sources at the closest off-site buildings up to 0.01 inch per second PPV and would be less than the significance threshold of 0.04 inch per second PPV for perceptibility. Therefore, as determined in the Final EIR, operational groundborne vibration impacts for operation of the 2023 Master Plan Revisions would be less than significant.

Conclusion

Impacts related to noise and groundborne vibration would be similar for the 2023 Master Plan Revisions as compared to those for the 2014 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(c) For a project located within-the vicinity of a private airstrip or-an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

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

2023 Master Plan Revisions

Construction, Operation and Conclusion

The same as the 2014 Master Plan, the 2023 Master Plan Revisions would have no impacts related to private and public airport noise, the same as determined for the 2014 Master Plan in the NOP/IS.

N. POPULATION AND HOUSING

Population and housing impacts of the project were evaluated with regard to the Final EIR. The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant was evaluated in relation to two questions recommended for consideration by the *State CEQA Guidelines.*

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(a) Inducing substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?** **(b) Displacing substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR indicates that the number of construction workers employed and working on-site would vary over the course of the construction period and over the lifetime of the 2014 Master Plan. The County has a large pool of construction labor from which to draw within commuting distance of the project site. Additionally, because of the highly specialized nature of most construction projects, workers are likely to be employed on the job site only for as long as their skills are needed to complete a particular phase of the construction process. For those reasons, it is reasonable to assume that most construction workers would not relocate their households to work on proposed Master Plan development and improvement projects. Therefore, construction activities would not induce substantial population growth. Impacts would be less than significant.

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

One of the guiding principles of the 2014 Master Plan was to maximize access to LAC+USC Medical Center facilities. Accordingly, the project was anticipated to attract additional visitors and consequently indirectly increase growth in the surrounding area. The increases in the employee population that could occur with anticipated development under the 2014 Master Plan would represent a relatively small percentage of the employment growth SCAG has projected in its regional and city forecasts. Additionally, the 2014 Master

Plan does not include the extension of roads or other infrastructure improvements in undeveloped areas outside the boundaries of the Campus that would indirectly induce substantial population growth in those areas. Therefore, growth impacts were determined to be less than significant.

All development and facilities under the 2014 Master Plan would be constructed within the existing boundaries of the Campus. There are no permanent housing units on Campus. Thus, no displacement of existing housing was anticipated as a result of anticipated development under the 2014 Master Plan.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would result in impacts similar to those anticipated for the 2014 Master Plan, with less-than-significant impacts related to the construction worker population. Therefore, the 2023 Master Plan Revisions would have the same less-than-significant impacts related to population growth during construction as determined in the Final EIR.

The 2023 Master Plan Revisions would have similar operational population growth and employment and economic opportunities as the 2014 Master Plan and the impacts would be the same as determined in the Final EIR, less than significant. The 2023 Master Plan Revisions would have no impacts related to displacement of housing or people because no housing or population would be removed.

Conclusion

Impacts related to population and housing would be similar for the 2023 Master Plan Revisions as compared to those for the 2014 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

O. PUBLIC SERVICES

Public Services impacts of the 2023 Master Plan Revisions were evaluated based on a review of the Final EIR and one question (relevant to each public service) recommended for consideration by the *State CEQA Guidelines.*

(a) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: **(i) Fire protection?** **(ii) Police protection?** **(iii) Schools** **(iv) Parks** **(v) Other public facilities**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

FIRE AND EMERGENCY SERVICES

2014 Master Plan

Construction

The Final EIR indicates that the 2014 Master Plan development may result in intermittent access restrictions for emergency responders, including the Los Angeles Fire Department, Los Angeles Sheriff's Department, and the Los Angeles Police Department, during construction, a potentially significant impact. In order to ensure emergency access, traffic flow, and the emergency responders' ability to maintain adequate response times and other performance objectives, mitigation measure MM-PS-1 was required.

The Final EIR indicates that construction of the 2014 Master Plan would not result in the need for new or altered fire or police protection facilities. Therefore, the temporary increased demand for these services during construction would be a less-than-significant impact.

Operation

The Final EIR indicates that the 2014 Master Plan would be generally consistent with current uses and development was not planned to occur outside the existing Campus boundaries. As a result, the 2014 Master Plan would not require the construction of new or altered fire facilities at Station 2 or any of the stations in the area that serve the surrounding communities. As part of the standard project approval process, the County of Los Angeles Fire Department reviews and approve all project plans to ensure compliance with applicable fire codes and standards including ingress/access requirements, thereby

minimizing the risk of increased operational fire hazards. Though LAFD is the primary emergency responder to the LAC+USC Medical Center Campus, the plan check reviews are conducted by the County of Los Angeles Fire Department's Engineering Section.

Conclusion

Under the 2014 Master Plan, older vacant or underutilized buildings that pose an increased risk of fire hazard would be demolished. LAPD indicated that the 2014 Master Plan would not have a significant impact on police services in the Hollenbeck Area. As such, the 2014 Master Plan was not expected to require construction of new or altered facilities to maintain acceptable service ratios, response times, or other public facility performance objectives Therefore, operational impacts on fire protection and police services were determined to be less than significant.

2023 Master Plan Revisions

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would result in generally the same uses on the Campus as the 2014 Master Plan. The 2023 Master Plan Revisions would comply with County Code and LACFD requirements. Like the 2014 Master Plan, it would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing fire station to maintain service.

Construction

As determined in the Final EIR, impacts of the 2023 Master Plan Revisions on emergency access and response times could still be significant. The 2023 Master Plan Revisions would implement mitigation measure MM-PF-1, to reduce this impact. With this measure, the construction-related impacts on fire and emergency services would be reduced to a less-than-significant level, the same as for the 2014 Master Plan.

Operation

The Campus as a whole under the 2023 Master Plan Revisions would increase the net floor area, employee population, and annual patient visits to the Medical Center Campus, though to a lesser extent than the 2014 Master Plan, due to incrementally reduced size. Impacts on emergency services would be similar to those described for the 2014 Master Plan and would be less than significant with mitigation.

Conclusion

Impacts related to fire and emergency services would be similar for the 2023 Master Plan Revisions as compared to those for the 2014 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

SCHOOLS

2014 Master Plan

Construction and Operations

The Final EIR indicates that construction activities are not expected to result in the need for new or altered schools or school facilities to maintain acceptable personnel ratios or other performance and learning objectives, as construction employees are expected to draw from existing nearby communities. Construction impacts to educational facilities were identified as less than significant.

The Final EIR indicates that during operation, the 2014 Master Plan could result in an increase of 2,416 employees on the Campus. Given the Campus' proximity to the freeway network and transit facilities, it's anticipated that these new employees would be dispersed over a wide geographic area within commuting distance of the Campus. Thus, the new households formed by these new employees are not likely to result in significant increases in student enrollment at any one school in the region. The indirect impact of these employees on student enrollment was not expected to result in new or altered schools or school facilities to maintain acceptable personnel ratios or other performance and learning objectives. Operational impacts to educational facilities were determined to be less than significant.

2023 Master Plan Revisions

Construction, Operations and Conclusion

Similar to the 2014 Master Plan, the 2023 Master Plan Revisions would not create a demand for schools that would require new or physically altered public schools. Therefore, there would be no change in the impacts related to schools; impacts would be less than significant, the same as for the 2014 Master Plan and no changes to or additional mitigation is required.

PARKS

2014 Master Plan

Construction

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

Operations

The 2014 Master Plan includes enhanced native grassland landscapes, lightly programmed terrain, and other developments intended to create accommodating open space for Campus employees, patients, and visitors. Therefore the Final EIR indicates that it is unlikely the 2014 Master Plan would result in a significant increase in the use of and demand for local, off-Campus park facilities. Thus, development that could occur under the 2014 Master Plan was not expected to require new or altered off-Campus parks and recreation facilities to maintain acceptable service ratios or other performance objectives. Operational impacts to parks were determined to be less than significant.

2023 Master Plan Revisions

Construction, Operations and Conclusion

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would not create a demand for park and recreational facilities. Therefore, there would be no change in the impacts related to parks and recreation; impacts would be less than significant, the same as for the 2014 Master Plan and no changes to or additional mitigation is required.

LIBRARIES

2014 Master Plan

Construction and Operations

Given the large pool of construction workers within commuting distance of the Campus, the Final EIR indicates that it is unlikely that construction workers would choose to permanently relocate to the area, and thereby increase the demand for local library services. Also, construction workers have limited

opportunities to use local libraries during the workday while working on Campus. Thus, new or altered library facilities to maintain acceptable service ratios or other performance objectives were not anticipated and construction impacts to libraries were determined to be less than significant.

The 2014 final EIR indicates that he estimated increase in the Campus employee population and increased visitors could result in an increased demand for local library services. However, this increase was not expected to be significant given the limited opportunity for employees to use local libraries during the work day and the fact that visitors to the Campus are more likely to use Campus facilities, than use the closest off-Campus library, which is located approximately 1 mile from the Campus. Additionally, employees are likely to reside within a large geographic area within commuting distance of the Campus, thus no one library in the surrounding region was expected to experience a significant increase in demand as a result of the proposed Master Plan. Therefore, operational impacts to libraries were determined to be less than significant.

2023 Master Plan Revisions

Construction, Operations and Conclusion

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would not create a demand for libraries that would require new or physically altered public libraries. Therefore, there would be no change in the impacts related to libraries; impacts would be less than significant, the same as for the 2014 Master Plan and no changes to or additional mitigation is required.

P. RECREATION

The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts to recreation was evaluated in relation to the Final EIR and two questions recommended for consideration by the *State CEQA Guidelines.*

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(a) Increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?** **(b) Inclusion of on-site recreational facilities or requirement for the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR indicates that the 2014 Master Plan was not expected to significantly increase the use of existing neighborhood parks or regional parks such that substantial physical deterioration of the facilities would occur or be accelerated. The 2014 Master Plan includes the development of five new landscaped and open space areas on the Campus to provide a variety of accessible outdoor experiences for public use and residents of adjacent communities. The provision of these additional active and passive recreational opportunities in the Northeast Los Angeles and Boyle Heights Community Plan areas would meet the needs of the residents in the community and be consistent with the goals and objectives outlined in the County and city general plans. Therefore, it was not expected that growth in on-Campus patient, visitor, or employee populations would result in a significant increase in the use of existing local parks or substantial physical deterioration of park facilities. Additionally, the increase in the number of households associated with increased on- Campus employee populations was expected to be dispersed over a wide geographic area within commuting distance of the Campus; therefore, a concentrated or substantially intensified use of local parks was not anticipated. Impacts were determined to be less than significant.

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

During project operations, it is not expected that routine daily use of new landscaped and open space areas would result in significant operational impacts on the environment. However, noise generated by large, organized events would have the potential to exceed applicable noise standards. Implementation of MM-NOI-5 would reduce the impact related to noise but not to a less than significant level. Demand for

recreational facilities during project operations is not expected to significantly increase due to additional employees being dispersed over a wide geographic area.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions impacts related to physical deterioration or accelerated deterioration to recreational facilities in the region would be similar to those of the 2014 Master Plan. Construction workers would be present intermittently over the multiple phases of the project and drawn primarily from the Los Angeles area, thereby resulting in less-than significant impacts, the same as under the 2014 Master Plan.

The 2023 Master Plan Revisions would include similar on-site recreational opportunities to the 2014 Master Plan. The pedestrian promenade through the Women's and Children's Hospital site would occur further east on the Campus; the 2023 Master Plan Revisions include landscaped areas, benches and small recreational areas. The required workforce at buildout would be similar to what was anticipated in the Final EIR. Therefore, impacts related to physical deterioration or accelerated deterioration of recreational facilities in the region would be the same as those of the 2014 Master Plan, if not minimally reduced.

The impacts related to new recreational facilities would be the same for the 2023 Master Plan Revisions as for the 2014 Master Plan. This construction of landscaped open space on site could continue to result in environmental effects (e.g., dust and other air emissions, noise). These impacts are analyzed in this Addendum as part of the general construction impacts for the 2023 Master Plan Revisions (B. Air Quality, M. Noise). No additional substantial effects would occur, and, like the 2014 Master Plan, impacts would be less than significant.

Conclusion

Impacts related to recreation would be similar for the 2023 Master Plan Revisions as compared to those for the 2014 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

Q. TRANSPORTATION

Transportation and traffic impacts of the project were evaluated in light of the Final EIR and the potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts related to transportation and traffic was evaluated in relation to four questions currently recommended for

consideration by the *State CEQA Guidelines*. As part of the 2018 *State CEQA Guidelines* updates, the checklist was revised to address consistency with *State CEQA Guidelines* Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The County published a VMT methodology in June, 2020, updated September 2, 2020. The traffic analysis below considers impacts of the 2023 Master Plan Revisions as compared to the 2014 Master Plan. Impacts related to delay and level of service are no longer considered impacts under CEQA (although these issues are still considered as part of the overall planning process).

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?** **(b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction

The Final EIR indicated that construction of facilities under the 2014 Master Plan would result in increased vehicle trips to the site and may alter access to the existing LAC+USC Medical Center Campus. The extent of lane and sidewalk closures will not be known until individual development projects are proposed and project plans are developed. Under MM-TRAF-1, construction traffic control measures are required that would reduce construction impacts to a less than significant level.

Operation

The Final EIR indicates that additional vehicle trips from the 2014 Master Plan would result in significant traffic impacts at five study intersections. No feasible mitigation measures were identified for four intersections. As a consequence, the impacts to those intersections were identified as significant and unavoidable. Mitigation was proposed for one intersection (State Street and Marengo Street) located within the City of Los Angeles; since the mitigation is subject to approval by the City of Los Angeles Department of Transportation (LADOT), implementation cannot be guaranteed and therefore the impact was identified

as significant and unavoidable. Mitigation measure MM-TRAF-3 requires implementing Transportation Demand Management (TDM) measures to reduce vehicle trips.

Impacts to intersections and levels of service are no longer considered significant under CEQA; traffic impacts are now evaluated based on vehicle miles traveled (VMT). The project site is well-served by transit; projects in such areas have fewer impacts with respect to VMT because some trips, can be made by transit rather than car. Conservatively, despite changes to CEQA to remove delay and levels of service as impacts under CEQA, operational traffic impacts are still considered significant and unavoidable for the purposes of this addendum.

2023 Master Plan Revisions

Construction

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions would result in similar construction activity overall as compared to the 2014 Master Plan. Overall total construction-related trips are anticipated to be less in total and total vehicle miles traveled (VMT) are anticipated to be the same or less in total. But daily construction activity could still be similar.

The 2023 Master Plan Revisions would implement the same construction methods as the 2014 Master Plan and would include MM-TRAF-1 (traffic control measures) which would continue to reduce impacts to a less than significant level.

Operation

As demonstrated in the *Traffic Impact Analysis Update* (see **Appendix A**), the 2023 Master Plan Revisions changes would result in a net reduction of about 22 trips per day at the former Women's and Children's Hospital site. As such, the 2023 Master Plan Revisions would result in essentially the same daily trips as the identified in the Final EIR and 2017 Addendum. Therefore, the 2023 Master Plan Revisions is considered to continue to result in potentially significant traffic impacts, similar to the Final EIR and 2017 Addendum. Under the 2023 Master Plan Revisions, mitigation measure MM-TRAF-2 (improvements to State Street and Marengo Street intersection)) would still be implemented if agreeable to LADOT. Because the 2023 Master Plan Revisions would generate essentially the same daily trips as identified in the Final EIR, therefore VMT would also be essentially the same. As noted above, the project is located in close proximity to transit. Projects close to transit have fewer impacts with respect to VMT because of reduced trips. MM-TRAF-3 (transportation demand management) would further reduce trips.

No parking structure or surface parking was identified for this area of the Campus in the 2014 Master Plan; 55 surface spaces are now proposed. Parking for the Campus as a whole, including any unmet need from the 2023 Master Plan Revisions, would continue to be provided in accordance with the 2014 Master Plan as applicable and appropriate.

The corner of N. Mission Road and Zonal Avenue as well as this area of Campus provides several bus and shuttle stops. Our County, Los Angeles Countywide Sustainability Plan, adopted August 6, 2019, includes strategies to encourage development near transit and "right-size" parking to incentivize use of public transportation and active transportation modes (Strategy 3B – Implement Transit-Oriented Development, Strategy 3C Promote walkable, mixed-use neighborhoods, Strategy 8A Reduce vehicle miles travelled by prioritizing alternatives to single-occupancy vehicles — including Action 103: Evaluate and implement demand-based priced parking at County facilities and on County streets where appropriate). The LA County Climate Action Plan, currently in preparation, also encourages reducing single-occupancy vehicle use (Strategy 3, Measure T5). By providing less parking than required by Code, the 2023 Master Plan Revisions would incentivize use of public transportation and active transportation modes and discourage single occupancy vehicle use.

While total daily trips and associated VMT would be essentially the same under the 2023 Master Plan Revisions, and despite changes to CEQA to remove delay and levels of service as impacts under CEQA, operational traffic impacts are conservatively still considered significant and unavoidable for the purposes of this addendum.

Conclusion

The Final EIR identified significant impacts with respect to operations. While these impacts were related to intersections and delay-based criteria, the 2014 Master Plan did identify substantial increases in vehicle trips and these increases are still conservatively considered significant for purposes of this addendum. Total daily trips and associated VMT would be essentially the same under the 2023 Master Plan Revisions, and as such, impacts are considered to continue to be significant and unavoidable; no changes to or additional mitigation is required.

(c) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantially increasing hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

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

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

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions would incorporate MM-TRAF-1, requiring a traffic control plan, that would continue to result in a less than significant, the same as under the 2014 Master Plan.

Like the 2014 Master Plan, the 2023 Master Plan Revisions would not include any uses that are incompatible with the existing street system and would not make any changes to the roadway network. As for the 2014 Master Plan, the 2023 Master Plan Revisions would also include a Campus-wide circulation system that would eliminate traffic hazards.

Conclusion

The 2023 Master Plan Revisions would have less than significant impacts related to traffic hazards, the same as under the 2014 Master Plan and no changes to or additional mitigation is required.

(d) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to inadequate emergency access?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

This issue of emergency response plans and emergency access is addressed under impacts to emergency response plans in Section I Hazards above.

R. TRIBAL CULTURAL RESOURCES

Impacts of the project on Tribal Cultural Resources were evaluated with regard to the Final EIR. Assembly Bill (AB) 52 went into effect on July 1, 2015, and requires that for a project for which a Notice of Preparation (NOP) for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project. The Notice of Preparation (NOP) for the 2014 Final EIR was published May 19, 2014, and therefore, the lead agency was not required to comply with the requirements of AB 52. The potential for the proposed 2023 Master Plan Revisions to result in new or substantially more adverse significant was evaluated in relation to two questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: **(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or** **(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

Impacts related to Tribal Cultural Resources were not separately addressed from Archeological Resources in the Final EIR and are addressed in the discussion of Cultural Resources (see **Section E, Cultural Resources,** above).

S. UTILITIES

Utilities and service systems impacts of the 2023 Master Plan Revisions were evaluated with regard to the Final EIR. The potential for the 2023 Master Plan Revisions to result in new or substantially more adverse significant impacts to utilities and service systems was evaluated in relation to five questions recommended for consideration by the *State CEQA Guidelines.*

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(a) Requiring or resulting in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The Final EIR indicates the at the 2014 Master Plan would increase wastewater generation. The Campus is located in an urban area that is currently served by wastewater infrastructure. During construction of individual projects wastewater would be generated by construction workers. Implementation of the 2014 Master Plan was estimated to result in a net increase of 173,382 gpd of wastewater, which represents less than 0.06% of the average daily flows in the Hyperion Sewer System. The amount would be relatively small and a 34% increase compared to the estimated 501,393 gallons per day of wastewater generated by existing uses on the Campus. The net increase in flows were not expected to exceed the capacities of the local sewer lines and wastewater treatment facilities that serve the project site (Bureau of Sanitation, 2014). Mitigation measure UTL-2 requires detailed gauging of sewers to identify specific sewer connection points with sufficient capacity and requires the county to construct sewer lines to a point in the system with sufficient capacity.

See discussion of impacts related to water supply below and see Section J Hydrology above regarding stormwater. The Final EIR did not identify significant impacts related to electric power or telecommunications.

The 2014 Master Plan indicates that existing SoCalGas forecasts of future natural gas supplies and demand extend to the year 2030. If insufficient supplies exist for Master Plan projects beyond the year 2030, the impact would be significant and unavoidable.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions would also include relocation or replacement of on-site utility infrastructure. Impacts to utility infrastructure would be the same as those of the 2014 Master Plan, less than significant with mitigation (MM-UUTL-1).

After construction of the 2023 Master Plan Revisions, there would be no impacts on utility infrastructure. See Sections regarding water supply and wastewater treatment below and Section J Hydrology, above, regarding impacts on water, wastewater, and stormwater infrastructure capacity, respectively.

Conclusion

As under the 2014 Master Plan, the impacts of the 2023 Master Plan revisions regarding relocating and/or constructing on-site infrastructure would be less than significant and no changes to or additional mitigation is required.

(b) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to having sufficient water supplies available to serve the proposed 2023 Master Plan Revisions and reasonably foreseeable future development during normal, dry, and multiple dry years?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

The 2014 Master Plan would replace on-site domestic water and fire water conveyance facilities with those that fully comply with more stringent and current County water conservation requirements. The 2014 Master Plan includes an increase in landscaped areas when compared to the existing Campus, which is minimally landscaped, but much of this area would be planted with drought-tolerant and California native plants, as required by the County.

The Final EIR indicates that proposed development under the 2014 Master Plan would increase the demand for water. The Los Angeles Department of Water and Power's Urban Water Management Plan identifies future water supply and demand in their service area through the year 2035. Therefore, it's not known whether future water supplies beyond the year 2035 would be sufficient to meet the needs of the Master Plan projects constructed far in the future, i.e., beyond the year 2035. Mitigation measure MM-UTL-1 requires study of water demand, as appropriate, for projects proposed in 2035 and beyond. Therefore, future water supply impacts, beyond the year 2035, were considered to be significant and unavoidable.

2023 Master Plan Revisions

Construction, Operation and Conclusion

Because the 2023 Master Plan Revisions would be similar to the 2014 Master Plan, its water supply demand would also be similar, and impacts would remain significant; no changes to or additional mitigation is required.

(c) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to resulting in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operation

Wastewater generated at the Campus is conveyed via sewer lines to the Hyperion Treatment Plant for treatment to full secondary standards. The treated wastewater, which is discharged via a 5-mile ocean outfall into Santa Monica Bay, is subject to state waste discharge requirements and federal NPDES permit requirements. The Final EIR indicates that the 2014 Master Plan Master Plan would not generate wastewater that would exceed Los Angeles RWQCB's wastewater treatment requirements. Therefore, construction and operation impacts related to wastewater treatment requirements were determined to be less than significant.

2023 Master Plan Revisions

Construction, Operation and Conclusion

Because the 2023 Master Plan Revisions could result in less total building area than the 2014 Master Plan, wastewater generation could also be reduced. Therefore, impacts of the 2023 Master Plan Revisions on wastewater could be less and would also be less than significant; no changes to or additional mitigation is required.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following: **(d) Generating solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?** **(e) Compliance with federal, state, and local management and reduction statutes and regulations related to solid waste?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction

There are several major landfills in the Los Angeles metropolitan area that serve the project area. Major landfills are defined as those facilities that receive more than 250,000 tons of solid waste per year. Given demolition debris and solid waste generated by construction activities would be finite and limited to the construction periods, existing landfills have sufficient long-term permitted capacity to accommodate construction generated solid waste and impacts related to landfills were determined to be less than significant.

Operation

The Final EIR indicates that the 2014 Master Plan would result in a net increase of 10,270 pounds of solid waste a day, and that there was adequate landfill capacity to accommodate the project's solid waste disposal needs. Impacts related to solid waste disposal were determined to be less than significant.

2023 Master Plan Revisions

Construction and Operation

The 2023 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2014 Master Plan as amended by 2017 Master Plan revisions. The 2023 Master Plan Revisions could result in similar construction and building areas as the 2014 Master Plan, and a similar amount of demolition would be required. Therefore, its generation of solid waste as the result of operation would be similar to that of the 2014 Master Plan. The 2023 Master Plan Revisions would also comply with the minimum diversion or recycling rate of 50 percent, as required

by County regulations. With adequate capacity for construction waste at the County's construction and demolition disposal sites, impacts related to solid waste disposal capacity due to construction activities would be less than significant, the same as those of the 2014 Master Plan.

The similar size of the 2023 Master Plan Revisions would result in similar impact on waste disposal facilities from operations compared to the 2014 Master Plan. Waste disposal for the 2023 Master Plan Revisions would be similar to the 2014 Master Plan's design features and compliance with County waste disposal procedures for recycling and diversion of waste from County landfills. With sufficient landfill capacity to accommodate residual waste generation, impacts of the 2023 Master Plan Revisions on waste disposal would be less than significant, the same as those of the 2014 Master Plan.

Conclusion

Impacts related to solid waste disposal would be similar for the 2023 Master Plan Revisions as compared to those for the 2014 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

T. WILDFIRE

As part of the *2018 State CEQA Guidelines* updates, new Wildfire checklist questions were added that pertain to projects that are located in, or near, state responsibility areas, lands classified as very high fire hazard severity zones, and other conditions that could pose a hazard with respect to Wildfire.

Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to being located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and any of the following: **(a) Substantially impairing an adopted emergency response plan or emergency evacuation plan?** **(b) Due to slope, prevailing winds, and other factors, exacerbating wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?** **(c) Requiring the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?** **(d) Exposing people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

Construction and Operations

As with the original project, the project site continues to be located in a highly urbanized area and is not located in or near state responsibility areas, lands classified as very high fire hazard severity zones, or otherwise in a location that would pose a hazard with respect to wildfire. The Final EIR addressed emergency access and response in Transportation; the project would not impact emergency access and would not impair an adopted emergency response plan or emergency evacuation plan. The site is relatively flat and is not subject to unusual wind conditions and is not located in an area that would be exposed to wildfire. The 2014 Master Plan did not require installation or maintenance of infrastructure that could exacerbate wildfire risks. The 2014 Master Plan did not expose people or structures to risks resulting from post-wildfire hazards. The Final EIR addressed fire protection in general in Public Services; the NOP/IS determined that the 2014 Master Plan would not result in impacts related to wildfire.

2023 Master Plan Revisions

Construction, Operation and Conclusion

The 2023 Master Plan Revisions would have no change to impacts with respect to wildfire and no changes to or additional mitigation is required.

U. GROWTH INDUCING IMPACTS

The Final EIR determined that the LAC+USC Medical Center Campus Master Plan project would not result in substantial growth inducing impacts. One of the guiding principles of the 2014 Master Plan is to maximize access to LAC+USC Medical Center facilities. Accordingly, the 2014 Master Plan was anticipated likely to attract additional visitors and consequently potentially indirectly increase growth in the surrounding area. However, the 2014 Master Plan does not include the extension of roads or other infrastructure improvements outside the boundaries of the Campus and was determined to not indirectly induce substantial population growth in the surrounding area. The 2014 Master Plan does not include a substantial housing component or displace any existing populations.

The increase in the employee population that would occur under the 2014 Master Plan was anticipated to fall within SCAG projections. The increases in employee and residential populations that could occur with buildout of the 2014 Master Plan were determined to not contribute substantially to any population growth in the area beyond what SCAG has projected in its regional and city forecasts. Therefore, the 2014 Master Plan was determined to not result in significant growth- inducing impacts on the environment.

Consistent with the Final EIR, the 2023 Master Plan Revisions would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. The proposed 2023 Master Plan Revisions would be located in an urban area within the City of Los Angeles County consistent with permitted uses and densities called for by the General Plan designation of the site. Additionally, the project would be located in close proximity to various public transportation opportunities.

Overall, as indicated in the Final EIR, the 2023 Master Plan Revisions would not result in an increase in the population that could tax existing community service facilities or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulatively. Thus, the proposed 2023 Master Plan Revisions would not result in significant growth-inducing impacts.

The 2023 Master Plan Revisions would be built in an existing urban setting and served by existing infrastructure and adjacent streets. The 2023 Master Plan Revisions would not provide through access to vacant undeveloped parcels whose development potential could otherwise be enhanced, nor would it require extending or improving infrastructure in a manner that would facilitate off-site growth.

Overall, the 2023 Master Plan Revisions would not remove obstacles to population growth, result in an increase in the population that may tax existing community service facilities or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulative. Thus, the same as discussed in the Final EIR for the 2014 Master Plan, the 2023 Master Plan Revisions would not result in significant growth-inducing impacts.

V. MANDATORY FINDINGS OF SIGNIFICANCE

Mandatory Findings of Significance were evaluated with respect to the Final EIR, and the three questions recommended by the *State CEQA Guidelines.*

(a) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the potential to substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

The 2014 Master Plan was determined to not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Project construction could result in the removal of palm trees or other roosting sites for Western yellow bats, a potentially significant but mitigable impact.

2023 Master Plan Revisions

The 2023 Master Plan Revisions also would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

(b) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to impacts, which are individually limited, but cumulatively considerable? ("Cumulatively considerable "means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

The Final EIR determined that the 2014 Master Plan in conjunction with other past, present, and probable future projects could result in significant cumulative impacts with respect to utilities (natural gas and water supplies). In addition, greenhouse gas emissions are cumulative in nature.

Section 15130 of the *State CEQA Guidelines* requires that an EIR evaluate potential environmental impacts that are individually limited but cumulatively significant. CEQA defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (*State CEQA Guidelines* Section 15355). The purpose of a cumulative analysis is to determine if several projects when evaluated together could result in a significant "cumulative" impact

that would otherwise not be considered significant when projects are evaluated one at a time. If several projects considered together have the potential to result in a significant cumulative impact (that is not already identified as a significant project impact), the question becomes whether the project being analyzed would result in a "considerable" contribution to such a significant cumulative impact. If a project results in a significant impact by itself, then its contribution to a cumulative impact is considerable.

Other than the eight issue areas where project impacts alone were determined to be significant (see below), the Final EIR determined that the 2014 Master Plan would not have impacts that are *individually limited* but cumulatively considerable. All issue areas where impacts were determined to be less than significant were determined to not contribute to any cumulatively considerable cumulative impact:

Aesthetics. The Final EIR determined that, loss of the Women's and Children's Hospital would be a significant aesthetic impact. Related projects in combination with the 2014 Master Plan would not degrade the existing visual character or quality of the site and its surroundings, and visual character impacts would not be cumulatively significant. Related projects in combination with the 2014 Master Plan would not obstruct or alter an existing, recognized valued public view or scenic vista, and view impacts would not be cumulatively significant. The 2014 Master Plan in combination with related projects would not create a new source of light or glare that would substantially alter the character of the area or result in substantial light spill/or glare and impacts with respect to light and glare would not be cumulatively significant. No significant cumulative impacts were anticipated that would require mitigation.

Agricultural Resources. The NOP/IS determined that the 2014 Master Plan would have no impact on agriculture and forestry resources; therefore, it would not result in or contribute to a cumulative impact for agriculture and forestry resources.

Air Quality. The 2014 Master Plan would have significant impacts after mitigation with respect to localized emissions during construction (PM10 and PM2.5). Regional emissions of criteria pollutants during construction and operation would not exceed SCAQMD thresholds and therefore would not have a considerable contribution to cumulative impacts.

Biological Resources. There are no candidate, sensitive, or special-status animal or plant species on-site, with the exception of two California black walnut trees that do not represent a regionally significant population. The proposed project could require the removal of palm trees or other potential roost sites for Western yellow bats. Mitigation would address this impact. Therefore, the 2014 Master Plan would not result in a considerable contribution to a cumulative impact related to biological resources.

Cultural Resources. Demolition of the Women's and Children's Hospital, which was determined eligible for the California Register, identified as a significant impact. Alterations to contributing features of General

Hospital setting were also determined to be significant. Photo documentation would be required, and a protection plan and historic structures report required for other features/buildings. Nonetheless, impacts remain significant and would contribute to the loss of historic fabric in the area. Ground disturbing activities have the potential to impact buried resources and remains. Mitigation would address this impact and would not result in a considerable contribution to cumulative impacts.

Energy. The 2014 Master Plan would adhere to the applicable state and County standards that would improve energy efficiency, it would not result in a considerable contribution to a cumulative impact related to energy.

Geology and Soil*s*. Geologic and soil impacts are generally site-specific and there is little, if any, cumulative relationship between development projects. The 2014 Master Plan adherence to all relevant plans, codes, and regulations with respect to project design and construction as well as the identified mitigation measures would reduce project-specific and cumulative geologic impacts. Therefore, the 2014 Master Plan, considered together with related projects, would not result in a cumulatively considerable contribution to cumulatively significant geology and seismicity impacts.

Greenhouse Gas Emissions. Estimated emissions of 37,281 MT which exceeds SCAQMD threshold of 3,000 MT. Mitigation measure would reduce emissions but not below a level of significance. The Master Plan would be consistent with relevant polices and plans. Greenhouse gas emissions are cumulative in nature.

Hazards and Hazardous Materials. The 2014 Master Plan and all development in the vicinity would be subject to the same local, regional, state, and federal regulations pertaining to hazards and hazardous materials. Therefore, the Final EIR determined that, with adherence to these regulations and the required mitigation measures, the 2014 Master Plan's incremental contribution to hazard and hazardous waste impacts would not be cumulatively considerable.

Hydrology and Water Quality. Construction of the 2014 Master Plan would not result in a violation of any water quality standards or waste discharge requirements, would not provide substantial additional sources of polluted runoff, and would not substantially degrade water quality. Compliance with construction phase permits and standard construction phase best management practices (BMPs) would decrease the potential for any significant erosion or sedimentation from soil disturbance associated with construction of the 2014 Master Plan and related projects. During construction, the amount of stormwater runoff is also anticipated to be less than or equal to the amount under existing conditions. Therefore, the Final EIR determined that contribution to cumulative impacts related to hydrology and water quality would not be considerable during construction. Compliance with County Low-Impact Development (LID) criteria as well as state and local regulations that require post-construction BMPs would ensure that operation of the

2014 Master Plan and related projects would not degrade the surface water quality of receiving waters to levels below standards considered acceptable by the Los Angeles Regional Water Quality Control Board or other regulatory agencies or impair the beneficial uses of the receiving waters. The 2014 Master Plan and related projects would also be required to comply with all applicable federal, state, and local requirements concerning handling, storage, and disposal of hazardous materials to reduce the potential for the release of contaminants into groundwater as a result of project operation. Therefore, the Final EIR determined that operation activities would not result in a cumulatively considerable contribution with respect to degrading groundwater quality or interfering with recharge.

Land Use. The Final EIR determined that the 2014 Master Plan would be infill development on an already urbanized site that would constitute a densification and slight increase in the height of the existing on-site medical uses. The 2014 Master Plan would be consistent with adopted regional and local land use plans, including the existing County General Plan land use designation and zoning for the site. It would also result in less-than-significant impacts with respect to land use incompatibility with the existing adjacent off-site land uses. Because the 2014 Master Plan would be consistent with the adopted land use plans and zoning, it would not result in a cumulatively considerable contribution to land use impacts.

Mineral Resources. The NOP/IS determined that the 2014 Master Plan would have no impact on mineral resources and therefore would not contribute to a cumulative impact on mineral resources.

Noise. Based on anticipated construction equipment and distance to sensitive receptors on-site construction impacts would be significant but they would not add to other known construction projects in the area. Mitigation would reduce noise but not below a level of significance. Vibration impacts would be less than significant. Operational impacts could result from equipment and outdoor events; mitigation measures would reduce noise levels below a levels of significant for mechanical equipment but outdoor events could create a significant impact, but would not add to other known sources of noise. As a result of increased vehicle trips operational noise would increase but by a less than significant amount and would not result in a considerable contribution to a cumulative impact.

Population and Housing. The Final EIR determined that the 2014 Master Plan's projected growth associated with cumulative housing and population would be within the Southern California Association of Governments' RTP/SCS projections and would not be cumulatively significant. The 2014 Master Plan's development would not introduce unplanned infrastructure or accelerate development in an undeveloped area, and cumulative impacts regarding such unplanned development would be less than significant.

Public Services. The Final EIR determined that, with mitigation, impacts to public services (police and fire access) would be less than significant and would not result in a considerable contribution to cumulative

impacts. The Final EIR determined that the 2014 Master Plan would not result in a considerable contribution to cumulative impacts related to demand for other public services (schools, libraries, parks).

Recreation. The 2014 Master Plan would not be expected to generate a substantial demand for public parks and recreational facilities for several reasons, including the amount of usable open space provided by the project. Therefore, the Final EIR determined that the 2014 Master Plan would not result in a considerable contribution to cumulative demand for public parks and recreational facilities, and cumulative parks and recreation impacts would be less than significant. The project would involve construction of recreational facilities throughout the Campus (walkways, open areas). As noted above construction would result in significant air and noise impacts; mitigation would reduce but not eliminate these impacts but they would not overlap with impacts of other construction projects.

Transportation. The Final EIR determined that the 2014 Master Plan would result in a project-specific significant impacts with respect to vehicle delay and levels of service during operation. While delay is no longer considered an impact under CEQA, the 2014 Master Plan would substantially increase trips and VMT on local roadways. Impacts related to operational traffic were determined to be significant and would add to impacts of other projects in the area. Transportation Demand Management would reduce but not eliminate this impact (MM-TRAF-3).

Tribal Cultural Resources. Addressed under Cultural Resources.

Utilities. LADWP indicated that water was available for the Master Plan projects identified in the Final EIR. Mitigation requires further study of major post-2035 projects. There remains uncertainty with respect to natural gas supplies post-2030 as SoCalGas does not forecast out beyond that time; therefore, availability of natural gas was identified as a potentially significant impact. Impacts to utilities are cumulative in nature and would add to impacts of other projects.

Wildfire. The 2014 Master Plan is in a highly urbanized area and is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, the 2014 Master Plan would have no impacts related to wildfire and would not contribute to cumulative impacts.

2023 Master Plan Revisions

No new projects have been identified that would substantially change the cumulative analysis identified in the Final EIR.

Like the 2014 Master Plan the 2023 Master Plan Revisions would have a cumulatively considerable contribution with respect to utilities and greenhouse gas emissions by their nature are cumulative impacts.

The Final EIR identified eight issue areas where project impacts alone were significant; these same impacts would continue under the 2023 Master plan revisions (see below).

Aesthetics. Impacts relative to loss of the Women's and Children's hospital were determined to be significant. Other than this impact (that would not contribute to other impacts in the area), the 2023 Master Plan Revisions would not result in a considerable contribution to cumulative impacts related to visual character or quality, views, and light and glare.

Agricultural Resources. As for the 2014 Master Plan the 2014 Master Plan would have no impact and would not contribute to a cumulative impact related to agricultural resources.

Air Quality. The 2023 Master Plan Revisions could result in similar construction and therefore would result similar emissions as compared to the 2014 Master Plan. Maximum emissions with mitigation could still exceed localized PM10 and PM2.5 thresholds during construction; however, these are localized emissions that would not overlap with other emission sources of related projects.

Biological Resources. The 2014 Master Plan would also incorporate the same mitigation and as for the 2014 Master Plan would not result in a considerable contribution to a cumulative impact related to biological resources.

Cultural Resources. Demolition of the Women's and Children's Hospital has occurred. No additional impacts would result from the 2023 Master Plan Revisions. Impacts to other resources would continue as described for the 2014 Master Plan. These impacts to historic resources would continue to add to the loss of such resources in the area.

Energy. The 2023 Master Plan Revisions would adhere to the applicable state and County standards that would improve energy efficiency and therefore would not result in a considerable contribution to a cumulative impact related to energy inefficiency and wastefulness.

Geology and Soils. The 2023 Master Plan Revisions would adhere to all relevant plans, codes, and regulations with respect to project design and construction, which would reduce project-specific and cumulative geologic impacts. Therefore, the 2023 Master Plan Revisions, considered together with related projects, also would not result in a considerable contribution to a cumulative impact related to geology, seismicity and soils.

Greenhouse Gas Emissions. Emissions from 2023 Master Plan Revisions would continue to contribute to total emissions that would exceed the SCAQMD threshold and would be cumulative in nature.

Hazards and Hazardous Materials. The 2023 Master Plan Revisions and all development in the vicinity would also be subject to the same local, regional, state, and federal regulations pertaining to hazards and hazardous materials. As a result, with adherence to these regulations, the 2023 Master Plan Revisions would not result in a considerable contribution with respect to hazards and hazardous materials.

Hydrology and Water Quality. The 2023 Master Plan Revisions would comply with the same County LID criteria and state and local regulations for post-construction BMPs as the 2014 Master Plan. Therefore, it would not result in a cumulatively considerable contribution to impacts related to hydrology and water quality.

Land Use. As for the 2014 Master Plan, the 2023 Master Plan Revisions result in similar land uses as today and would be consistent with the adopted land use plans and zoning, and the 2023 Master Plan Revisions would not result in a cumulatively considerable contribution to impacts related to land use.

Mineral Resources. As for the 2014 Master Plan, the 2023 Master Plan Revisions would not contribute to a cumulative impact on mineral resources.

Noise. Grading and construction activities would occur in a similar manner as for the 2014 Master Plan. The Final EIR evaluated construction noise impacts at similar distances to sensitive receptors as would be impacted with the 2023 Master Plan Revisions and therefore significant impacts would be similar. Operational impacts would also continue to be similar to those evaluated in the Final EIR. Given the size of the project and distance between uses, the significant construction and operational impacts are not anticipated to overlap substantially with other noise sources.

Population and Housing. The 2023 Master Plan Revisions would have the same land uses and a similar number of employees as the 2014 Master Plan. Therefore, the 2023 Master Plan Revisions would not contribute to cumulatively significant growth.

Public Services. The 2023 Master Plan Revisions would have the same land uses and a similar number of employees as the 2014 Master Plan. Therefore, the 2023 Master Plan Revisions also would not contribute to cumulatively significant demand for fire and emergency medical services, police protection, schools, and libraries.

Parks and Recreation. The 2023 Master Plan Revisions would have the same land uses and a similar number of employees as the 2014 Master Plan, and it would provide similar amounts of open space. Construction of recreational facilities could have similar impacts to the 2014 Master Plan and such impacts with respect to air quality and noise could be significant. The 2023 Master Plan Revisions would not

contribute to cumulatively significant demand for parks and recreation and operational impacts would be less than significant and not cumulatively considerable.

Transportation. Transportation impacts during construction would be less than significant and not cumulatively considerable. The 2014 Master Plan impacts operational traffic were considered significant primarily as a result of vehicle delay and level of service impacts. These impacts are no longer considered significant under CEQA, however, for purposes of this addendum the 2023 Master Plan Revisions is considered to have a significant impact on traffic during operation; vehicle trips and VMT would be similar for the 2023 Master Plan Revisions.

Tribal Cultural Resources. Addressed under Cultural Resources above.

Utilities. The 2023 Master Plan Revisions would result in similar building area as the 2014 Master Plan, which would result in similar impacts to water supply, natural gas supply, wastewater generation, and solid waste disposal impacts. Therefore, like those of the 2014 Master Plan, the 2023 Master Plan Revisions would result in a considerable contribution to cumulative impacts and would be cumulatively significant.

Wildfire. The 2023 Master Plan Revisions is located on the same site as the 2014 Master Plan. Therefore, it also would have no impacts related to wildfire and would not contribute to cumulative impacts.

(c) Do the proposed 2023 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		
	Yes	**No**
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☑

2014 Master Plan

This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. Direct and indirect project impacts on human beings were determined to be less than significant upon implementation of mitigation with the exception of the following impacts which remain significant and would affect human beings to one degree or another:

1. **Aesthetics** (Section 3.1 of the Final EIR). Demolition of the Women's and Children's Hospital building, an aesthetically noteworthy building because of its architectural design and historical value, was

considered a significant unavoidable adverse visual impact of the proposed project (no mitigation measures were identified to address this impact).

2. **Air Quality** (Section 3.2 of the Final EIR). Emissions of PM10 and PM2.5 emissions from on-site clearing and demolition would exceed SCAQMD localized thresholds. Implementation of Mitigation measures MM-AQ-2 and MM-AQ-3 and compliance with Rule 403 would reduce emissions, but not below level of significance. Therefore, this impact was considered significant and unavoidable after implementation of mitigation measures.

3. **Cultural Resources** (Section 3.4 of the Final EIR). The demolition of the Women's and Children's Hospital building, a building determined eligible for listing in the California Register of Historical Resources, was considered an unavoidable significant adverse historical resources impact. (Mitigation Measure MM-CR-2 required photo documentation of the building but would not reduce the impact.)

4. **Greenhouse Gas Emissions** (Section 3.6 of the Final EIR). GHG emissions would exceed a 3,000 MT CO2e annual threshold; MM-GHG-1 would reduce emissions but not below a level of significance, therefore, GHG emissions were considered a significant and unavoidable cumulative impact.

5. **Noise and Vibration** (Section 3.10 of the Final EIR). While MM-NOI-1 would reduce construction noise levels, it would not eliminate the predicted noise impacts entirely; therefore, construction noise impacts are considered significant and unavoidable. Construction vibration impacts would be considered significant and unavoidable after implementation of mitigation measure MM-NOI-6. Large organized outdoor events at the project site were also identified as having the potential to cause a periodic substantial increase in ambient noise levels at nearby off-site sensitive receptors; MM-NOI-5 would reduce but not eliminate this impact.

6. **Recreation** (Section 3.13 of the Final EIR). Construction of new on-Campus landscaped open space areas and recreational facilities could result in noise and air quality impacts on nearby sensitive receptors (also see Air Quality and Noise and Vibration above). Although mitigation would reduce these impacts, they would remain significant after mitigation.

7. **Transportation/Traffic** (Section 3.14 of the Final EIR). Additional vehicle trips would result in significant traffic impacts at five study intersections. No feasible mitigation measures were identified for four intersections. As a consequence, the impacts to those intersections were identified as significant and unavoidable. The proposed mitigation measures at the remaining intersection is located within the City of Los Angeles and the mitigation was subject to approval by the City of Los Angeles Department of Transportation (LADOT), which was not guaranteed and therefore the impact was identified as significant and unavoidable.

Impacts to intersections and levels of service are no longer considered significant under CEQA; traffic impacts are now evaluated based on vehicle miles traveled (VMT). The project site is well-served by transit; projects in such areas have fewer impacts with respect to VMT because some trips can be made by transit rather than car. Conservatively, despite changes to CEQA to remove delay and levels of service as impacts under CEQA, operational traffic impacts are still considered significant and unavoidable for the purposes of this addendum.

8. **Utilities** (section 3.15 of the Final EIR). Increased consumption of various utilities including water and natural gas. The Los Angeles Department of Water and Power's Urban Water Management Plan identifies future water supply and demand in their service area through the year 2035; and adequate capacity was identified for the 2035 Master Plan. However, it's not known whether future water supplies beyond the year 2035 would be sufficient. Similarly, existing SoCalGas forecasts of future natural gas supplies and demand extend to the year 2030. If insufficient supplies exist for master plan projects beyond the year 2030, the impact would be significant and unavoidable. The Final EIR also identified sewer capacity as a potential issue as the County has no control over local sewer lines; mitigation measure MM-UTL-2 requires additional gauging of sewer lines for project that increase sewer flows and if no capacity is available the County is required to construct new lines to a point where capacity is available; nonetheless the impact was considered significant.

2023 Master Plan Revisions

The 2023 Master Plan Revisions would result in the same significant and unavoidable impacts as the 2014 Master Plan, with the exception of traffic impacts related to delay and level of service, although traffic impacts are still considered significant:

1. **Aesthetics** (Section 3.1 of the Final EIR). The Women's and Children's Hospital building was demolished in 2021. The impact has already occurred.

2. **Air Quality** (Section 3.2 of the Final EIR). Demolition and site clearing has already occurred at the Women's and Children's Hospital site. Building foundations may require some additional earth moving which could result in fugitive dust, possibly in excess of standards resulting in this impact potentially remaining significant. Localized thresholds would not be exceeded at the Women's and Children's Hospital site, but development on the remainder of the Campus would continue to occur as anticipated in the Final EIR with significant localized impacts with respect to PM10 and PM2.5

3. **Cultural Resources** (Section 3.4 of the Final EIR). The Women's and Children's Hospital building was demolished in 2021. The impact has already occurred. (Mitigation Measure MM-CR-2 required photo

documentation of the building but would not reduce the impact.). Impacts to other parts of the Campus could continue to occur as individual projects move forward.

4. **Greenhouse Gas Emissions** (Section 3.6 of the Final EIR). The Mental Health Urgent Care Center, Withdrawal Management Facility, and Psychiatric Subacute Facility would be part of the overall Master Plan and would contribute to GHG emissions on the Campus that would remain in excess of 3,000 MT, and therefore this impact would continue to be significant.

5. **Noise and Vibration** (Section 3.10 of the Final EIR). Construction of buildings on the Women's and Children's Hospital site would have the same noise levels as anticipated in the Final EIR and therefore this impact would continue to be significant. There would be no outdoor events associated with the 2023 Master Plan Revisions but events on Campus would be expected as under the 2014 Master Plan and they would continue to be significant.

6. **Recreation** (Section 3.13 of the Final EIR). The new buildings would include recreational facilities as part of the buildings and construction of these facilities together could still result in noise and air quality impacts.

7. **Transportation/Traffic** (section 3.14 of the Final EIR). The changes from the 2023 Master Plan Revisions would result in the same or fewer vehicle trips and VMT as under the 2014 Master Plan and therefore impacts would be the same or less than 2014 Master Plan. Projects in proximity to transit have fewer impacts with respect to VMT because transit use reduces vehicle trips. Conservatively, despite changes to CEQA to remove delay and levels of service as impacts under CEQA, traffic impacts of the 2023 Master Plan Revisions as a whole are still considered significant and unavoidable for the purposes of this addendum.

8. **Utilities** (section 3.15 of the Final EIR). Demand for utilities would be similar to what was anticipated under the 2014 Master Plan. Impacts would remain significant because of uncertainties in future water and natural gas supplies.

W. CONCLUSION

The 2023 Master Plan Revisions described in Section 2 of this Addendum would be within the assumptions analyzed in the Final EIR. The 2023 Master Plan Revisions have been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the *State CEQA Guidelines*. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions (identified in **Section 1**) apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified LAC+USC Medical Center Campus Master Plan Final EIR is the appropriate environmental documentation under CEQA for the 2023 Master Plan Revisions.

Section 3 discusses issue-by-issue how the impacts anticipated for the 2023 Master Plan Revisions would be within those previously identified in the Final EIR. The Mitigation Monitoring and Reporting Program (MMRP) adopted with the Final EIR would continue to apply as appropriate to the 2023 Master Plan Revisions to ensure that all impacts are reduced as necessary and feasible.

As discussed throughout this Addendum (see in particular the summary presented in **Table 3**), the 2023 Master Plan Revisions would result in environmental impacts within those analyzed for every issue with implementation of applicable Project Design Features and mitigation measures as included in the adopted MMRP for the 2014 Master Plan.

4. REPORT PREPARATION

LEAD AGENCY

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Brett Pomeroy, Associate Principal

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Wendy Lockwood, Principal

JESSICA KIRCHNER, AICP

CEO & Managing Principal

EDUCATION

Master's Degree in Urban Planning, University of Southern California

Bachelor of Arts, Journalism, Rutgers University

AFFILIATIONS

Association of Environmental Planners, Board Member, Legislative Committee

American Institute of Certified Planners, Certified Planner

Jessica is owner and Managing Principal and she frequently serves in multiple roles on projects, including contract and project manager, as well as conducting and writing environmental analyses all while overseeing the firm's most high-profile clients, revenue, and growth of the firm. With 20 years of experience and a background in journalism, Jessica's emphasis on clear, concise documents that are not overly complicated has become a company hallmark, along with the ability to deliver projects on unbelievably tight deadlines. She is highly skilled at taking technical documents and concepts and translating them into reader-friendly concepts. She has managed the preparation of more than 100 CEQA documents, including numerous projects with the County of Los Angeles including the Department of Public Works Whittier Narrows Splashpad Project, Sun Valley Watershed Management Plan, and Downey Laboratory Expansion Project. Jessica also serves as an advisor to lead agencies on CEQA implementation. She has provided input to and taught workshops and seminars on CEQA compliance, CEQA streamlining, and environmental justice analysis.

Jessica has a wide range of project experience, including commercial developments, housing projects, regional plans, and policy documents. Jessica's technical expertise and experience provide her with the tools necessary to guide projects through the environmental review process and address hurdles as they arise. As a project manager, Jessica interacts with projects from the beginning to provide project recommendations and assist with any conflict resolutions. Engaging early in the process allows the team to incorporate design features that may help streamline the review process and produce a project that is well received by the public and decision makers.

Jessica is actively involved in projects, including contract administration, client engagement, and leadership of the overall preparation of environmental documents. Jessica also represents the team at meetings and provides public presentations on behalf of the project. Jessica works closely with internal and external team members to provide a seamless approach towards project management, especially for technical and controversial projects. Based on her experience with complex projects, Jessica understands how to work with sensitive communities and bridge the gap between stakeholders and decision makers.

Jessica's extensive experience has provided her with a strong technical background that is sought after for peer reviews and quality control. Jessica is familiar with recent legislation/regulations and case law governing environmental documentation. In addition, her vast knowledge of environmental regulations allows her to provide policy consistency analyses for projects and decipher the most appropriate approach to move projects forward.

BRETT POMEROY

Associate Principal

EDUCATION
Bachelor of Science, Natural Science, Loyola Marymount University

AFFILIATIONS
Association of Environmental Planners (AEP)

CEQA and NEPA workshops and conferences

Completed AERMOD Dispersion Modeling Training Seminar held by Lakes Environmental

Brett Pomeroy has more than 19 years of professional experience in the environmental planning field with an emphasis in environmental compliance pursuant to CEQA and NEPA. Brett's experience includes preparing and managing environmental documentation for both private- and public-sector clients. He has overseen the preparation of numerous technical analyses for a wide range of projects. He has provided environmental analyses to support several types of environmental documents, including categorical exemptions, initial studies, negative declarations (NDs), mitigated negative declarations (MNDs), mitigation monitoring & reporting programs (MMRPs), environmental impact reports (EIRs), and addenda.

Brett has worked on a variety of projects, including community planning, housing, mobility, mixed-use/commercial, climate change and sustainability; and numerous projects with the County of Los Angeles, such as the Department of Public Works Whittier Narrows Splashpad Project (CEQA Exemption Memo and Technical Studies for Air Quality and Noise/Vibration) and Downey Laboratory Expansion Project. Brett's duties include project management, document preparation, and oversight of technical services. He is familiar with current regulations and case law relating to land use, housing, mobility, noise, air quality, and greenhouse gas (GHG) emissions. Additionally, Brett possesses strong writing skills to help effectively communicate the results of environmental analyses to decision makers and the general public.

Brett possesses a strong technical background and has provided quantitative analytical modeling support for air quality, GHG, health risk assessments, noise and vibration, and shade/shadow impact analyses for several complex and multi-faceted projects using industry accepted modeling software. As the Technical Director, Brett provides general oversight of technical services and leads the preparation and review of the air quality, greenhouse gas, and noise/vibration technical reports. Specifically, Brett has experience with AERMOD and ISC air dispersion modeling systems, CalEEMod, CALINE4-based model, noise modeling based on the Federal Highway Administration's Traffic Noise Model (TNM) and Roadway Construction Noise Model (RCNM).

As a project manager, Brett provides guidance and recommendations during the planning stages to ensure project objectives at achieved and deliverables are met on time and within budget.

Wendy Lockwood

Education
Sussex University, England, Chemistry, concentration in Environmental Science
Master's degree, Candidate, Environmental Management, University of San Francisco
Professional Affiliations
Association of Environmental Professionals
Los Angeles Conservancy
American Planning Association

Ms. Lockwood is an environmental consultant with over 25 years' experience in the preparation of environmental documents pursuant to the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). She has been the Project Manager for major projects and technical task leader on complex projects involving noise, air quality, energy, and hazardous wastes/materials issues. Ms. Lockwood has broad knowledge and understanding of State and local planning regulations and regional planning documents in Southern California. She has participated in the preparation of environmental documentation for over 500 projects.

Ms. Lockwood has experience with a wide variety of projects, issues and communities and using this experience is able to quickly identify and address issues of potential concern before they become major problems. Her technical background allows her to review complex documentation and identify potential analytic flaws. For these reasons, Ms. Lockwood is frequently asked by lead agencies, larger consulting firms, and lawyers to provide detailed review and recommendations concerning CEQA and NEPA documents, including providing overall advice concerning approach and content of environmental documents, critical review of completed documents/analyses as well as providing specific review of more complex projects and/or issues.

In January 2006, Ms. Lockwood started the small environmental consulting firm of Sirius Environmental (Sirius). Sirius (WBE/SBE/VSBE) is an environmental consulting firm that provides CEQA and NEPA related services. Sirius Environmental was formed to focus on project and program management of projects and programs requiring a detailed understanding of CEQA and NEPA and requiring responsive, individualized management. Sirius Environmental provides support to developers, engineers, consulting firms and public agencies in the preparation of clear, accurate technical reports and documents that meet the increasingly demanding needs of communities and their decision makers.

Ms. Lockwood's areas of technical specialty are land use, energy conservation, noise, air quality, greenhouse gas emissions and hazardous materials. She has overseen the preparation of numerous technical analyses for a variety of projects – small and large. She is familiar with land use regulation and prepares policy consistency analyses for projects in complex regulatory environments as well as aesthetic analyses for projects in urban and rural environments.

Ms. Lockwood is an experienced CEQA and NEPA project manager. She has overseen the preparation of comprehensive environmental documents for a variety of different projects, managing complex technical analyses and providing advice to clients regarding effective mitigation strategies. She is familiar with recent case law with respect to environmental documentation. She undertakes public outreach for controversial projects in a number of sensitive communities.

Ms. Lockwood provides QA/QC for a variety of projects including transportation projects (Regional Transportation Plans, Mid-Coast Corridor Transit Project, Orange Line Extension), policy documents (City of Los Angeles CEQA staff training, Updated Thresholds Guide) and plans (Mobility Element, Hollywood Community Plan, Boyle Heights Community Plan).

APPENDIX A

Traffic Memorandum

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MEMORANDUM

To: County of Los Angeles, Department of Public Works
From: Brett Pomeroy, Associate Principal, Impact Sciences, Inc.
Subject: LA+USC Medical Center Campus Master Plan - 2023 Master Plan Revisions; Traffic Impact Analysis Update
Date: October 23, 2023
Job No.: 1250.008

OVERVIEW

The Los Angeles County Board of Supervisors (Board), acting on behalf of the County of Los Angeles (County), certified on November 18, 2014, the LAC+USC Medical Center Campus Master Plan Final Environmental Impact Report (2014 Final EIR), State Clearinghouse Number 2014051061. The name of the project has since been changed to the Los Angeles General Medical Center Campus. However, this analysis continues to use the original name so that continuity of environmental documentation is clear. The purpose of this memorandum is to update the project trip generation estimates in the 2014 Final EIR and 2017 Addendum to reflect the proposed changes to the approved Master Plan, and to determine whether the changes may result in new significant traffic impacts. To illustrate potential changes in trip generation associated with the proposed 2023 Master Plan, this memorandum utilizes information contained in the *Traffic Impact Analysis Update for LA+USC Medical Center Master Plan Revisions*, prepared by Fehr and Peers, October 23, 2017 (Fehr and Peers 2017).

Approved Master Plan – Land Uses and Trip Generation Estimates

The 2014 Final EIR analyzed the LAC+USC Medical Center Campus Master Plan that was dated November 2014, herein referred to as "2014 Master Plan," after meetings with stakeholders, community leaders, residents, and businesses surrounding the LAC+USC Medical Center Campus (Medical Center Campus or Campus). The 76-acre project site that is the LAC+USC Medical Center Campus is surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles, in Los Angeles County. The main campus site is generally bounded by Zonal Avenue, Mission Road, Marengo Street, and Chicago Street. State Street bisects the project site. In addition, the project site extends to parcels on each side of Mission Road north of Zonal Avenue and on both sides of Griffin Avenue west of Mission Road and includes the parking structure south of Marengo Street.

The 2014 Master Plan project was envisioned to be undertaken over a period of approximately 25 years and was designed to guide future development of the Campus and influence the delivery of health care services and health-related community programs. The 2014 Master Plan EIR evaluated proposed development including construction of new and renovated medically related office, retail, open space, and parking uses and demolition of existing buildings and structures to accommodate new development. Full build out of the 2014 Master Plan was anticipated to result in a total of approximately 1,725,000 square feet of development throughout the campus (removal of 722,709 square feet of existing uses; development of 1,245,000 square feet of new uses plus 450-bed hospital addition).

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

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

The existing childcare facility and College of Nursing would be relocated on the campus but would maintain their current enrollment capacities.

In the 2014 Master Plan, two buildings are shown on the site of the former Women's and Children's Hospital:

- Biotech Research Building appears to be up to six stories and up to approximately 108,000 square feet.
- Community and Office Building appears to be up to four stories and up to about 72,000 square feet.

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

2017 Revisions to the Master Plan – Land Uses and Trip Generation

The following revisions to the approved 2014 Master Plan were proposed in 2017 and were analyzed within the first Addendum to the 2014 Master Plan EIR (2017 Addendum):

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

In the 2017 Revisions to the Master Plan, there were no changes to land uses or trip generation associated with the site of the former Women's and Children's Hospital.

The trip generation estimates for the 2017 Revisions to the Master Plan, as approved, are presented in **Attachment B**. This table is identical to Table 3 in Fehr and Peers' 2017 traffic analysis update. The net external daily trips were 3,535, including 694 AM peak hour trips and 485 PM peak hour trips. When the trip generation estimates of the revised 2017 Master Plan were compared to those of the approved 2014 Master Plan, it was estimated there would be 409 less daily trips, including 17 fewer trips in the AM peak hour and 17 few trips in the PM peak hour. In 2017, Fehr and Peers concluded the revised 2017 Master Plan would not result in new significant traffic impacts, or any change in impacts requiring revisions to the adopted mitigation measures for the traffic impacts identified in the 2014 EIR.

Proposed 2023 Master Plan Revisions – Land Uses and Trip Generation Estimates

The proposed 2023 Master Plan only affects the 4.5-acre, former site of the Women's and Children's Hospital; the remainder of the Campus would continue to be developed as described in the 2014 Master Plan as updated by the 2017 Master Plan revisions. The 2023 Master Plan revisions include the following components:

1. Two-story, 33,650 square-foot building to contain:
    a. 15,770 square foot Mental Health Urgent Care Center (MHUCC) on the first floor, with 32 adult and 8 adolescent chairs – no beds

b. 17,880 square foot Residential Withdrawal Management Facility (WMF) with 32 beds on the second floor.

2. Four-story, 115,420 square foot, 128-bed, Psychiatric Subacute Facility.
3. Surface parking (approximately 55 spaces). Up to four stories of parking was considered but is removed from the current plan but remains a possibility. [Consistent with County sustainability policies less parking is proposed than may be required by Code.] Additional parking would be available at other Campus parking lots/facilities.

In the 2014 Master Plan, two buildings are shown on the site of the former Women's and Children's Hospital:

- Biotech Research Building appears to be up to six stories and up to approximately 108,000 square feet.
- Community and Office Building appears to be up to four stories and up to about 72,000 square feet.

While these two buildings would no longer be built on the Women's and Children's Hospital site, some of these uses could be relocated elsewhere on campus as part of design refinements. For purposes of analysis, it is assumed that the 2023 Master Plan revisions would permanently remove 60,000 square feet of Biotech Research and 50,000 square feet of office space from the Master Plan. Removal of this space would result in new totals as follows: 448,000 square feet of Biotech Research and 215,000 square feet of professional offices. It is anticipated that less than this will be developed but this is what is assumed for purposes of analysis. **Attachment C** shows the anticipated trips from removal of 60,000 square feet of Biotech Research and 50,000 square feet of professional offices and the addition of 15,770 square feet of Mental Health Urgent Care Center (MHUCC), 32 beds for residential Withdrawal Management Facility (WMF) and 128 beds for a subacute psychiatric facility.

With the 2023 Master Plan Revisions, the Women's and Children's Hospital site would not be used for Biotech Research or Community and Office but would now be a new mental-health focused use – Restorative Care Village. This use is a type of medical expansion and outpatient facilities providing mental health care to the community. The Final EIR contemplated 450 new hospital beds and 200,000 square feet of outpatient/clinics. The Psychiatric Subacute facility (128 beds) and WMF (32 beds) would be less intense than a full hospital use with less equipment and activity; the 15,770 square foot MHUCC would be similar to other outpatient facilities contemplated in the Final EIR. However, since the 2023 Master Plan Revisions are being located in the Biotech and Community and Office zones it was assumed that those Master Plan uses would be replaced and that the 2023 Master Plan Revisions would not count against Master Plan hospital beds or outpatient facilities.

Trip generation estimates for the proposed 2023 Master Plan are based on *Trip Generation, 9th Edition*, Institute of Transportation Engineers (ITE), 2012, and the traffic analysis contained in the 2014 Master Plan EIR and the 2017 Master Plan Addendum (see **Attachment C** for trip generation rates). This analysis applies credits for internal capture and transit in a manner consistent with the 2014 and 2017 Master Plan traffic impact analyses. As stated therein, internal capture represents the percentage of trips between the land uses that occur within the LAC+USC Medical Center. Due to the synergy between the land uses of the Master Plan, a 15% internal capture trip reduction was determined to be appropriate. The transit credit applied in the 2014 and 2017 Master Plan traffic impact analyses was based on LADOT's Traffic Study Policies and Procedures, June 2013. The guidelines state that a 15% transit credit may be taken for projects within 1/4 mile of a transit station. Due to the continued synergy between the land uses of the Master Plan and proximity to transit, the application of internal capture and transit-related trip credits continue to be appropriate for the 2023 Master Plan revisions. As shown in **Attachment C**, the proposed 2023 Master Plan change would result in a net reduction of about 22 trips. As such, the proposed 2023 Master Plan would result in essentially the same daily trips as the Approved Project conditions identified in the 2014 Final EIR and 2017 Addendum.

CONCLUSION

As shown in **Attachment C**, the proposed 2023 Master Plan changes would result in a net reduction of about 22 trips per day at the former Women's and Children's Hospital site. As such, the proposed 2023 Master Plan would result in essentially the same daily trips as the Approved Project conditions identified in the 2014 Final EIR and 2017 Addendum. Therefore, the proposed 2023 Master Plan would not result in new or increased significant adverse impacts associated with traffic and no changes to previously adopted mitigation measures are required.

Attachments:

A *2014 Master Plan Trip Generation*

B *2017 Master Plan Trip Generation*

C *Proposed 2023 Master Plan Trip Generation*

Attachment A

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

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

Notes:

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

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

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

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

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

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

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

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

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

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

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

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

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

Attachment B

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

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

Notes:

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

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

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

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

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

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

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

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

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

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

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

2023 Master Plan Trip Generation Changes for Former Site of Women's and Children's Hospital

Approved Project (2014 Master Plan EIR & 2017 Master Plan Addendum - Uses To Be Removed)				
Land Use	**Size (ksf)**	**ITE Code**	**Daily Rate**	**Daily Trips**
Biotech Research Building	60	760 [a]	8.11	486.60
Less: Internal Trips Credit	*-15%*	*[e]*		*(72.99)*
Less: Transit Credit	*-15%*	*[f]*		*(62.04)*
Net External Vehicle Trips				351.57
Professional/Administrative Office	50	710 [b]	11.03	551.50
Less: Internal Trips Credit	*-15%*	*[e]*		*(82.73)*
Less: Transit Credit	*-15%*	*[f]*		*(70.32)*
Net External Vehicle Trips				398.45
			Total Removed	**750**

Proposed Project (2023 Master Plan - Uses To Be Added)				
Land Use	**Size (ksf/beds)**	**ITE Code**	**Daily Rate**	**Daily Trips**
Mental Health Urgent Care Center	15.77	720 [c]	36.13	569.77
Less: Internal Trips Credit	*-15%*	*[e]*		*(85.47)*
Less: Transit Credit	*-15%*	*[f]*		*(72.64)*
Net External Vehicle Trips				411.66
Residential Withdrawal Management Facility (beds)	32	620 [d]	2.74	87.68
Less: Internal Trips Credit	*-15%*	*[e]*		*(13.15)*
Less: Transit Credit	*-15%*	*[f]*		*(11.18)*
Net External Vehicle Trips				63.35
Psychiatric Subacute Facility (beds)	128	620 [d]	2.74	350.72
Less: Internal Trips Credit	*-15%*	*[e]*		*(52.61)*
Less: Transit Credit	*-15%*	*[f]*		*(44.72)*
Net External Vehicle Trips				253.39
			Total Added	**728**
			Net Change	**(22)**

Trip Rate Source: Trip Generation, 9th Edition, Institute of Transportation Engineers (ITE), 2012; per 2014 & 2017 Master Plans

[a] ITE Code 760 (Research and Development)

[b] ITE Code 710 (General Office Building)

[c] ITE Code 720 (Medical Office Building)

[d] ITE Code 620 (Nursing Home)

[e] Internal capture represents the percentage of trips between the land uses that occur within the LAC+USC Medical Center. Due to the synergy between the land uses of the Master Plan, an internal trips credit has been applied to provide daily project traffic volume forecast. Consistent with the 2014 and 2017 Master Plan traffic impact analyses, a 15% internal capture trip reduction has been applied to all of the Project land use components.

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