

## 6.0 OTHER CEQA CONSIDERATIONS

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### 1. INTRODUCTION

This section addresses specific topics including significant unavoidable environmental impacts; reasons why the project is being proposed, notwithstanding its significant unavoidable impacts; growth inducing impacts; potential secondary effects; and less than significant impacts of the proposed Project.

### 2. SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *CEQA Guidelines* requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. Following is a summary of the impacts associated with the proposed Master Plan Project that were concluded to be significant and unavoidable in Chapter 4.0, Environmental Impact Analysis, of this Draft EIR.

#### (a) Noise

##### (1) Construction

The temporary sound barrier prescribed in Mitigation Measure NOISE-1 and project design feature PDF-NOISE-1, can achieve a noise reduction of 15 dBA or more in areas where the line-of-sight between construction-period noise sources and off-site receptor locations is obstructed. Therefore, the construction-period  $L_{eq}$  would be reduced to below the 60 dBA significance threshold at the south of the Medical Center Campus, Location R3 and the east of the Medical Center Campus, Location R5 and the 65 dBA significance threshold at north of the Medical Center Campus, Location R4. However, even with implementation of the mitigation measure, construction related noise would be a maximum of 83 dBA at the multi-family residential uses across 220<sup>th</sup> Street during Phase C, Phase 5, and Phase 6. As this would exceed the significance threshold of 60 dBA, the construction noise impacts would be significant and unavoidable at the single- and multi-residential uses across 220<sup>th</sup> Street, during Phase C, Phase 5, and Phase 6.

##### (2) Operation

Operation of the temporary helistop at either potential location (the Interim 1 Helistop location or Interim 2 Helistop location) would exceed noise thresholds at one nearby sensitive receptor location (i.e., residential uses to the south of the Medical Center Campus across 220<sup>th</sup> Street). While this impact would be temporary, as significant noise impacts would no longer occur at this or any other location once the permanent helistop on the roof of the New Hospital Tower is operational, no feasible mitigation is available to reduce the significance of impacts due to the proximity of both feasible interim locations to noise-sensitive uses. Thus, this impact is considered significant and unavoidable.

#### (b) Transportation and Traffic

##### (1) Construction

Despite the incorporation of Project Design Feature PDF TRAF-1, Construction Traffic Management Plan, construction traffic impacts from construction worker vehicles and truck trips, for both Project-level and

cumulative conditions, are conservatively concluded to be significant and unavoidable. However, with implementation of PDF TRAF-1 and PDF TRAF-2, impacts related to construction-related vehicle access, pedestrian and bicycle access and safety, public transit service, and construction parking would be less than significant.

## **(2) Operation**

### **(a) Intersection Levels of Service**

**Normandie Avenue & Torrance Boulevard (Intersection #1)** - The Project would result in a significant impact at this intersection in the Interim Existing plus 2023 Project plus Cumulative (2023) and Existing plus 2030 Project plus Cumulative (2030) scenarios using its current lane configuration. Intersection improvements to increase the capacity of the roadway system and to reduce impacts at this intersection to a level below significance were investigated, such as the addition of separate right- turn lanes at the eastbound or westbound approaches, but were deemed infeasible due to insufficient street right-of-way. Thus, this impact would remain significant and unavoidable.

**Vermont Avenue & Torrance Boulevard (Intersection #2)** - The Project would result in a significant impact at this intersection in the Existing plus 2023 Project plus Cumulative and Existing plus 2030 Project plus Cumulative Interim (2023) and Cumulative (2030) scenarios using its current lane configuration. Intersection improvements to increase the capacity of the roadway system and to reduce impacts at this intersection to a level below significance were investigated, such as additional northbound or southbound through lanes, but were deemed infeasible due to insufficient street right-of-way. Thus, this impact would remain significant and unavoidable.

**Normandie Avenue & Carson Street (Intersection #4)** - The Project would result in a significant impact at this intersection under the Existing, Interim (2023) and Cumulative (2030) scenarios using its current lane configuration. Intersection improvements to increase the capacity and/or efficiency of the roadway system and to reduce impacts at this intersection to a level below significance were investigated, such as reconfiguring the eastbound and westbound approaches to provide an additional through lane, but were determined to conflict with preliminary concepts from the West Carson Transit Oriented Development Specific Plan. Preliminary concepts call for the addition of bike lanes in each direction. The street does not have sufficient right-of-way to accommodate both new bike lanes and an additional through lanes. Thus, this impact would remain significant and unavoidable.

**Berendo Avenue & Carson Street (Intersection #6)** - The Project would result in a significant impact at this intersection under the Existing and Cumulative (2030) scenarios using its current lane configuration. Intersection improvements to increase the capacity and/or efficiency of the roadway system and to reduce impacts at this intersection to a level below significance were investigated, such as reconfiguring the eastbound and westbound approaches to provide an additional through lane, but were determined to conflict with preliminary concepts from the West Carson Transit Oriented Development Specific Plan. Preliminary concepts call for the addition of bike lanes in each direction. The street does not have sufficient right-of-way to accommodate both new bike lanes and an additional through lanes. Thus, this impact would remain significant and unavoidable.

**Medical Center Drive & Carson Street (Intersection #7)** - The Project would result in a significant impact at this intersection in the Existing plus 2030 Project, Existing plus 2023 Project plus Cumulative, and Existing plus 2030 Project plus Cumulative scenarios using its current lane configuration. Intersection improvements to increase the capacity and/or efficiency of the roadway system and to reduce impacts at this intersection to a level below significance were investigated, such as reconfiguring the eastbound and westbound approaches to provide an additional through lane, but were deemed to conflict with preliminary concepts from the West Carson Transit Oriented Development Specific Plan. Preliminary concepts call for the addition of bike lanes in each direction. The street does not have sufficient right-of-way to accommodate both new bike lanes and an additional through lanes. Thus, this impact would remain significant and unavoidable.

**Vermont Avenue & Carson Street (Intersection #8)** - The Project would result in a significant impact at this intersection under the Existing, Interim (2023) and Cumulative (2030) scenarios using its current lane configuration. Intersection improvements to increase the capacity and/or efficiency of the roadway system and to reduce impacts at this intersection to a level below significance were investigated, such as reconfiguring the eastbound and westbound approaches to provide an additional through lane, but were determined to conflict with preliminary concepts from the West Carson Transit Oriented Development Specific Plan. Preliminary concepts call for the addition of bike lanes in each direction. The street does not have sufficient right-of-way to accommodate both new bike lanes and an additional through lanes. Thus, this impact would remain significant and unavoidable.

**I-110 Southbound Ramps & Carson Street (Intersection #9)** - The Project would result in a significant impact at this intersection under the Existing, Interim (2023) and Cumulative (2030) scenarios. The implementation of this mitigation measure would reduce the Project-related impact to a less than significant level and would reduce the cumulative impact to a less than significant level in the AM peak hour. The impact during the PM peak hour would also be reduced, but not below a significant level. This improvement would require coordination with and approval by Caltrans. Because implementation of this improvement is not entirely within the control of the lead agency, and because the improvement would not fully mitigate the identified impacts in all scenarios, this impact would be considered significant and unavoidable.

**Vermont Avenue & 220th Street (Intersection #14)** - The Project would result in a significant impact at this intersection under the Existing and Cumulative (2030) scenarios using its current lane configuration. Intersection improvements to increase the capacity and/or efficiency of the roadway system and to reduce impacts at this intersection to a level below significance were investigated, such as reconfiguring the eastbound approaches to provide a dedicated left turn-lane but were determined to conflict with the Los Angeles County Transit Oriented Districts Access Study. The Study calls for curb extensions at all four crossings to shorten the pedestrian crossing distance. The intersection approaches do not have sufficient space to accommodate both curb extensions and additional lanes. Thus, this impact would remain significant and unavoidable.

**220th Street/I-110 Northbound Ramps & Figueroa Street (Intersection #15)** - As shown in Tables 4.L-24 and 4.L-25, the implementation of Mitigation Measure TRAF-2 would reduce the Project-related impact at this intersection to a less than significant level. However, this improvement would require coordination with and approval by Caltrans. Because implementation of this improvement is not entirely within the control of the lead agency, this impact is considered significant and unavoidable.

**Normandie Avenue & 223rd Street (Intersection #17)** - The Project would result in a significant impact at this intersection in the Cumulative (2030) Existing plus 2030 Project and Existing plus 2030 Project plus Cumulative scenarios using its current lane configuration. Intersection improvements to increase the capacity and/or efficiency of the roadway system and to reduce impacts at this intersection to a level below significance were investigated, such as reconfiguring the eastbound and westbound approaches to provide an additional through lane, but were deemed to conflict with preliminary concepts from the West Carson Transit Oriented Development Specific Plan. Preliminary concepts call for the addition of bike lanes in each direction. The street does not have sufficient right-of-way to accommodate both new bike lanes and an additional through lanes. Thus, this impact would remain significant and unavoidable.

**Vermont Avenue & 223rd Street (Intersection #19)** - The Project would result in a significant impact at this intersection under the Existing, Interim (2023) and Cumulative (2030) scenarios using its current lane configuration. Intersection improvements to increase the capacity and/or efficiency of the roadway system and to reduce impacts at this intersection to a level below significance were investigated, such as reconfiguring the eastbound and westbound approaches to provide an additional through lane, but were determined to conflict with preliminary concepts from the West Carson Transit Oriented Development Specific Plan. Thus, this impact would remain significant and unavoidable.

**I-110 Southbound Ramps & 223rd Street (Intersection #20)** - As shown in Tables 4.L-22 and 4.L-23, the implementation of Mitigation Measure TRAF-3 would reduce the Project-related impact at this intersection to a less than significant level. However, this improvement would require coordination with and approval by Caltrans. Because implementation of this improvement is not entirely within the control of the lead agency, this impact is considered significant and unavoidable.

Overall, the Project would result in twelve (12) significant and unavoidable impacts to study area intersections, even though Tables 4.L-22 through 4.L-25 show that proposed improvements, if implemented, would reduce impacts at these intersections, because implementation of the proposed improvements is not entirely within the control of the lead agency.

### **(b) Freeway Mainlines and Intersections**

Mitigation Measure TRAF-4 requires that the developer make a fair-share contribution to address potentially significant impacts on freeway mainline segments, intersections under Caltrans jurisdiction, and off-ramps. Caltrans generally considers fair share contributions to constitute full mitigation of a significant impact. In addition, under CEQA Guidelines Section 15130(a)(3) fair share contribution could be considered adequate mitigation for cumulative traffic impacts. Options for addressing the impacts were identified, but because there are no existing projects that identified by Caltrans that would lower the impact below the significance threshold, the significant impacts identified above to Caltrans facilities are conservatively determined to be significant and unavoidable.

## **3. REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING ITS SIGNIFICANT UNAVOIDABLE IMPACTS**

In addition to identification of the Project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines also requires a description of the reasons why the Project is being proposed, notwithstanding significant unavoidable impacts associated with the Project. The reasons why the Harbor-UCLA Medical

Center Campus Master Plan Project has been proposed are identified in the Statement of Project Objectives subsection in Chapter 2.0, *Project Description*, of this Draft EIR. The underlying goal or purpose of the Project is to redevelop the County-owned facility to support a modern, integrated healthcare delivery system. The primary objective of the Project is to provide a new hospital tower to replace the acute care functions of the existing hospital before the state law (Alquist Hospital Facilities Seismic Safety Act, also known as Senate Bill 1953) deadline to meet seismic standards for critical trauma/tertiary acute care so that the South Bay service region and the County seamlessly retain the key link in the County-wide trauma hospital safety net. The Project would feature biomedical research and development facilities, and would integrate inpatient and outpatient services in a renovated and expanded setting. The project benefits which are balanced against the remaining significant unavoidable impacts will also be addressed in the Statement of Overriding Considerations that will be made by the Board of Supervisors if they approve the project.

Four Alternatives to the proposed Project were evaluated in Chapter 5.0, *Alternatives*, of this Draft EIR. These include the No Project/No Build Alternative, Reduced Intensity Alternative A, Reduced Intensity Alternative B, and Reduced Intensity Alternative C. Among these alternatives, only the No Project/No Build Alternative would avoid all of the significant unavoidable effects of the proposed Project. However, the No Project/No Build Alternative would result in eventual closure of the existing Hospital, the layoff of a large number of high paid medical sector workers, and lack of achievement of any of the Project objectives, while the three reduced intensity alternatives would result in only partial achievement of the Project objectives. Furthermore, none of the three reduced intensity alternatives would reduce all of the significant unavoidable impacts of the Project (e.g., significant unavoidable construction noise, construction traffic, and operational traffic impacts), though Reduced Intensity Alternative C would eliminate the significant operational traffic impact that would occur under the Project. Finally, since the No Project/No Build Alternative would not meet the underlying purpose of the Project, it is not considered a feasible Project alternative.

In addition to the regulatory and environmental reasons why the Project has been proposed as cited above, there are safety- and licensing-related reasons in support of the proposed development. Such reasons include seismic safety risks associated with older hospital facilities and licensing requirements for acute care facilities such as the Harbor-UCLA Medical Center, which are regulated by OSHPD. As required by OSHPD, all acute care facilities must meet the minimum requirements for seismic safety and other design features in order to remain operational. Aside from the need to update and expand the existing Harbor-UCLA Medical Center facilities to meet current and future health care demands, the ongoing operation of the existing Hospital could not continue in the long-term without significant retrofitting and other physical improvements, which would require closure of the Hospital for the duration of construction activities and the temporary loss of all emergency and acute medical care services in the South Bay community.

#### **4. GROWTH-INDUCING IMPACTS**

Section 15126.2(d) of the *CEQA Guidelines* requires an EIR to discuss the ways the proposed Project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

The Project would address the future needs of the communities served by the Harbor-UCLA Medical Center Campus. The existing Campus contains 1,279,284 square feet of developed floor area, including the recently completed Surgery and Emergency Room Replacement Project (Replacement Project), 5,464 existing employees, and an estimated 545,079 annual patient visits. The Project encompasses construction of a New Hospital Tower that meets current seismic building codes, renovation of the existing Hospital tower to house non-acute care support uses, replacement of aging facilities (including approximately a dozen WWII barracks), reconfigured vehicular and pedestrian access to and circulation within the Campus, and implementation of a cohesive site design that enhances the experience of staff, patients, and visitors. This would result in a small net decrease in inpatient hospital beds (from 453 to 446 beds), a net increase of 1,178,071 square feet of building floor area, and net increases in total Campus-wide employees and annual patient visits of 37 percent (2,030 employees) and 34 percent (185,745 annual visits or 714 daily visits), respectively.

The Project would not cause a progression of growth beyond the Project Site. The Project Site is located in an area surrounded by urbanized land, is already fully development, and is already served by existing infrastructure (e.g., roads and utilities) and community service facilities (e.g., police, fire, schools, parks, and libraries). The Project's only infrastructure improvements would consist of tie-ins to, and extensions of, the existing utility main-lines already serving the Project area. No extension of roadways, utilities or community services to currently un-served areas would occur. Furthermore, the Project would not include residential development and thus would not directly generate a residential population, and although the Project would increase employment on the Campus, adequate existing and future housing stock is available in the area to accommodate these employees (see Section 4.J., *Population and Housing*, of this Draft EIR for analysis). Furthermore, this increase in employees would not exceed the 2035 SCAG projections for the area identified in the 2012 RTP/SCS. Therefore, the Project would not result in significant growth inducing impacts.

## 5. POTENTIAL SECONDARY EFFECTS

Section 15126.4(a)(1)(D) of the *CEQA Guidelines* requires a discussion of the potential impacts of mitigation measures only if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the Project as proposed. If so, these effects may be discussed in less detail than the significant effects of the Project. With regard to this section of the *CEQA Guidelines*, the Project's proposed mitigation measures that could cause potential impacts were evaluated to determine if any would cause one or more significant effects. The following provides a discussion of the potential significant adverse secondary effects that could occur as a result of the implementation of the Project mitigation measures, listed by environmental issue area. None of the mitigation measures are found to have adverse secondary significant effects.

### (a) Biological Resources

Mitigation Measure BIO-1 (from Initial Study) requires the provision of breeding season avoidance buffers around passerine and raptor nest sites during Project construction and vegetation removal activities, and the implementation of a CDFW-reviewed Nesting Bird Management Plan that includes biologist monitoring of nesting sites and identification of nest-specific mitigation measures to protect the birds and their young. This mitigation measure would minimize or avoid overall losses of sensitive resources, and would not result in any significant adverse secondary effects.

## **(b) Cultural Resources**

Mitigation Measure CULT-1 through CULT-4 (from Initial Study) require monitoring, recovery, and documentation of any archaeological and paleontological resources discovered during Project construction. These measures are intended to preserve on-site archaeological and paleontological resources, and would not result in any significant adverse secondary effects.

## **(c) Geology and Soils**

Mitigation Measures GEO-1 through GEO-3 require implementation of all the recommendations in the Preliminary Geotechnical Evaluation (provided in Appendix C of this Draft EIR) regarding seismicity, liquefaction, compressible/collapsible soils and settlement, shallow groundwater, expansive soils, and corrosive soils, including the performance of detailed subsurface geotechnical evaluations of the planned improvement sites and the provision of detailed construction-site specific recommendations for pile/footing foundations and building design and construction. These measures would include the drilling of exploratory borings and the cutting of exploratory excavations at the planned improvement sites, and potentially dewatering and the removal of liquefiable and other adverse soil layers and replacement with compacted fill. While these activities would generate some dust and constructed equipment related air emissions, noise and traffic, these localized impacts have already been incorporated into the Project construction-related air, hydrology and water quality, noise and traffic analyses in Chapter 4.0 of the Draft EIR, and no additional significant adverse secondary effects would occur.

## **(d) Hazards and Hazardous Materials**

Mitigation Measure HAZ-1 requires the abatement of ACMs, LBP, and PCBs in existing on-site buildings in accordance with the recommendations of the Hazardous Buildings Materials Survey prior to renovation or demolition activities. This would include the extraction, removal and disposal of these materials in accordance with the special handling and disposal requirements of applicable federal, state and local regulations. Because this measure would reduce impacts on the environment through characterizing and removing dangerous materials, and because the referenced requirements have been formulated to avoid significant environmental impacts (such as significant health impacts), no significant adverse secondary effects would occur.

Mitigation Measure HAZ-2 requires the implementation of a Los Angeles County Fire Department-approved comprehensive Soils Management Plan for areas of the Project Site identified in the Phase I ESA (included in Appendix E of this Draft EIR) as containing potential soil contamination for which site closure has not been confirmed to be implemented during excavation and grading activities. This measure would include excavation monitoring, laboratory testing of potentially contaminated soils, and the proper removal, handling, transportation, and disposal of any identified contaminated soils at a licensed facility in accordance with applicable federal, state and local laws and regulations. Because this measure would reduce impacts on the environment through characterizing and removing dangerous materials, and because the referenced requirements have been formulated to avoid significant environmental impacts (such as significant health impacts), no significant adverse secondary effects would occur.

Also, while the two mitigation measures above would generate some dust and constructed equipment-related air emissions, noise and traffic associated with required excavations and removal of contaminated

materials and USTs, these localized impacts have already been incorporated into the Project construction-related air, noise and traffic analyses in Chapter 4.0 of the Draft EIR. Therefore, no additional significant adverse secondary effects would occur.

### **(e) Noise**

Mitigation Measure NOISE-1 requires the installation of temporary noise barriers during construction on the Project Site to block the line-of-site between on-site construction equipment and off-site noise-sensitive receptors. The installation of such temporary noise barriers during the construction period could potentially require construction equipment which could generate some temporary air emissions and noise. However, any such impacts are addressed within the construction-related air and noise analyses in Chapter 4.0 of this Draft EIR.

### **(f) Public Services**

Impacts regarding some public services (e.g., parks and recreation, schools, and libraries) would be less than significant and no mitigation measures are required. Therefore, no significant adverse secondary effects would occur due to the implementation of mitigation measures for these environmental topics. However, with regard to fire protection and emergency services, Mitigation Measure FIRE-1 requires that the County Department of Public Works and/or their contractors regularly notify and coordinate with the LACFD concerning Project construction activities, including any on- and off-Campus lane closures and other construction activities that could affect emergency access and emergency response times. Mitigation Measure FIRE-2 requires that prior to the issuance of building permits, the applicants for development under the Project will pay the prevailing LACFD Developer Fee. With regard to Sheriff protection, Mitigation Measure SHER-1 requires that security features and personnel be provided throughout construction, Mitigation Measure SHER-2 requires that emergency access be provided during construction, while Mitigation Measure SHER-3 requires that the Project construction contractors regularly notify and coordinate with the LACSD concerning Project construction activities, including any on- and off-Campus lane closures and other construction activities that could affect emergency access or emergency response times. Thus, implementation of these mitigation measures would not result in additional physical impacts to the environment beyond those already anticipated for the Project as discussed in Chapter 4.0 of this Draft EIR.

### **(g) Transportation and Parking**

Mitigation Measures TRAF-1 through TRAF-3 would require restriping at the following existing intersections: I-110 Southbound Ramps & Carson Street; 220<sup>th</sup> Street/I-110 Northbound Ramps & Figueroa Street; and the I-110 Southbound Ramps & 223<sup>rd</sup> Street. Other than short disruptions of traffic at these intersections during the restriping, which would occur in accordance with County, City, and/or Caltrans requirements, no physical impacts would occur. Therefore, no significant adverse secondary effects would occur.

Mitigation Measure TRAF-4 requires the developer to contribute fair share funding to Caltrans toward an analysis or improvements on I-110 (Harbor Freeway) in the Project vicinity to offset the additional Project-generated trips that would result on the freeway mainline segments that pass through the affected Caltrans intersection. No physical impacts would occur under this mitigation measure (any future improvement of the I-110 and associated intersections would be subject to separate CEQA review and would be too



speculative to evaluate in the current Draft EIR). Therefore, no significant adverse secondary effects would occur.

## **6. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT (BEFORE MITIGATION) IN THE INITIAL STUDY**

Section 15128 of the *CEQA Guidelines* states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a Project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and is included in Appendix A-1 of the Draft EIR. The analysis in the Initial Study determined that the Project would result in less than significant impacts related to Agriculture and Forestry Resources, Biological Resources, Cultural Resources (Historical Resources and Human Remains), Geology and Soils (Fault Rupture, Landslide, and Soils Incapable of Supporting Septic Systems), Hazards and Hazardous Materials (Wildfires), Hydrology and Water Quality (Flooding from 100-Year Floods, and Inundation by Seisch, Tsunami and Mudflows), Land Use (Physically Divide an Established Community, and Conflict with an Applicable Habitat Conservation Plan or Natural Community Conservation Plan), Mineral Resources, and Population and Housing (Displace Substantial Numbers of Existing People or Housing, Necessitating Replacement Housing Elsewhere), and that these issues would thus not be evaluated further in the Draft EIR in accordance with *CEQA Guidelines* Section 15063(c)(3)(A). The basis for the less than significant conclusion regarding these issues is discussed below.

### **(a) Agriculture and Forestry Resources**

The Project Site is not located on or in proximity to any land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and no farmland or agricultural operations occur in the Project area. The Project would not conflict with the existing zoning for an agricultural use, as the site is currently zoned for and contains urban uses. Additionally, no portion of the Project Site is enrolled in a Williamson Act Contract. Project implementation would not result in changes to or cause rezoning of forest land, timber land or timberland zoned for Timberland Production. In addition, the Project area does not include areas zoned or utilized for timberland production. No forest land exists in the Project area; as such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. As the Project would not have the potential to affect farmland, forest land, or agricultural or forestry operations, no impacts would occur in this regard.

### **(b) Biological Resources (Riparian Habitat, Wetlands, Conflicts with Local Biological Resources Plans/Ordinances/Policies or Adopted Habitat Conservation Plans)**

The Project Site is located in an urbanized area and does not contain riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands, other sensitive natural communities, or federally protected wetlands. Also, the Project Site does not contain biological resources, such as large oak trees, protected by local plans, ordinances or policies (including habitat conservation plans and natural community conservation plans). Furthermore, the Project would include a landscape plan that would provide plantings as required by the County Municipal Code. As the Project would not have the potential to affect these biological resources or conflict with local biological resources plans, ordinances or policies regarding these resources, no impact would occur in this regard.

### **(c) Cultural Resources (Historical Resources and Human Remains)**

With respect to historical resources, a comprehensive Historic Resources Report was prepared by for the Project Site and is included in Appendix A of the Initial Study. According the report, the Project Site does not contain listed historic resources, and while the property as a whole was evaluated in the report as a potential historic district, the report concluded that while the property is significant in the context of World War II military history in Los Angeles, it lacks integrity because there are not enough buildings remaining from the period and the remaining buildings have been substantially altered. As such, the report determined that the property is not eligible for listing in the National Register or California Register as an historic district, and further that none of the individual structures themselves are eligible for listing.

With respect to human remains, the Project Site has been previously graded and developed, and no known traditional burial sites or cemeteries occur on-site. Nevertheless, human remains, if present, could potentially be unearthed during Project construction activities. However, compliance with state law (I.e., Public Resources Code Section 5097.98, State Health and Safety Code Section 7050.5, and California Code of Regulations Section 15064.5(e) would avoid significant impacts to any unanticipated human remains that are unearthed.

### **(d) Geology and Soils (Fault Rupture, Landslide, and Soils Incapable of Supporting Septic Systems)**

According to Figure 12.1, Seismic and Geotechnical Hazard Zones Policy Map, of the County's General Plan 2035, the Project Site is not located within a seismic or geotechnical hazard zone. Further, the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone. As no known earthquake faults or Alquist-Priolo Earthquake Fault Zones existing on or near the site, there would be no potential for surface fault rupture to affect future uses at the site.

With respect to landslides, the terrain of the Project Site is relatively flat as is the terrain of the surroundings. Furthermore, as indicated in Figure 12.1 of the County's General Plan 2035, the Project Site is not located within a seismically induced landslide zone and no sloped areas existing in the immediate vicinity. As such, no landslide impacts would occur.

With respect to the ability of on-site soils to supporting septic systems, the Project would connect to the municipal wastewater system rather than use septic systems or other alternative wastewater disposal systems. Therefore, no impact would occur in this regard.

### **(e) Hazards and Hazardous Materials (Wildfires)**

The Project Site is located within a highly urbanized area surrounded by urban uses, and the site is not located within an identified wildland fire hazard areas or very high fire hazard severity zone based on Figure 12.6, Fire Hazard Severity Zones Policy Map, of the County's General Plan 2035. Therefore, no wildland fire impact would occur.

**(f) Hydrology and Water Quality (Flooding from 100-Year Floods, and Inundation by Seisch, Tsunami and Mudflows)**

According to Figure 12.2, Flood Hazard Zones Policy Map, of the County's General Plan 2035, the Project Site is not located within a 100-year flood hazard area. The Project Site is also not located within a FEMA-designated 100-year floodplain. Therefore, the Project would not be subject to flooding from 100-year floods, and thus no impact would occur in this regard

With respect to inundation by seisch, tsunamis or mudflows, the Project Site is not located adjacent to a large body of water, is located over five miles from the Pacific Ocean, and is not located adjacent to any hillsides. Therefore, the Project would not be subject to inundation by seisch, tsunamis or mudflows, and no impact would occur.

**(g) Land Use (Physically Divide an Established Community, and Conflict with an Applicable Habitat Conservation Plan or Natural Community Conservation Plan)**

The Project would involve the renovation and expansion of existing medical uses, and the development of new medical uses, within an already fully developed urbanized campus surrounded on all sides by urban development. Furthermore, none of the four streets bordering the Project Site would be closed, and access to adjacent land uses would be maintained. Therefore, the Project would not physically divide an established community.

With respect to conflicting with a habitat conservation plan or natural community conservation plan, no such plans are applicable to the Project Site.

**(h) Mineral Resources**

The Project Site is not located within a known mineral resource area and no mineral resources are known to exist at the Project Site or in the surrounding area, as shown in Figure 9.6, Natural Resource Areas, of the County's General Plan 2035. Furthermore, the Project Site is not located within a Mineral Resource Zone and there are no known designated locally-important mineral resources located on the Project Site or in the vicinity, as illustrated in Figure 9.6 of the County General Plan 2035. Therefore, no impact to mineral resources would occur.

**(i) Population and Housing (Displace Substantial Numbers of Existing People or Housing, Necessitating Replacement Housing Elsewhere)**

The Project Site does not contain existing housing, and the Project would thus not displace existing housing or residents that would necessitate the development of replacement housing elsewhere. Furthermore, the Project would retain the existing on-site jobs and create new on-site jobs, so that existing employees would not be displaced. Thus, no impact would occur.

## 7. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT (BEFORE MITIGATION) IN THE DRAFT EIR

The Environmental impact analysis presented in Chapter 4.0, *Environmental Impact Analysis*, of this Draft EIR concludes that the Project would result in no impacts or less than significant impacts (before mitigation) for the following environmental issues. See the applicable sections of Chapter 4.0 of the Draft EIR for the reasons supporting these conclusions for each environmental issue.

- Aesthetics
  - Visual Character
  - Views
  - Light and Glare
- Air Quality
  - Consistency with Air Quality Management Plan
  - Violation of Air Quality Standards
  - Non-Attainment Pollutants
  - Substantial Pollutant Concentrations
  - Odors.
- Energy
  - Energy Consumption
- Geology and Soils
  - Soil Erosion/Loss of Topsoil
- Greenhouse Gas Emissions
  - Greenhouse Gas Emissions
  - Greenhouse Gas Reduction Plans
- Hazards and Hazardous Materials
  - Airport Safety Provisions
  - Emergency Response Plans
- Hydrology and Water Quality
  - Violation of Water Quality Standards
  - Depletion Groundwater Supplies
  - Alteration of Drainage Patterns Resulting in Substantial Erosion or Siltation
  - Flooding
  - Runoff that Would Exceed Drainage System Capacity
  - Degradation Water Quality

- Land Use and Planning
  - Consistency with Applicable Land Use Plans, Policies, and Regulations
  - Land Use Compatibility
- Noise
  - Off-Site Construction Traffic Noise
  - Operational Traffic Noise
  - Operational Non-Roadway Noise
  - Operational Parking Structure Noise
  - Construction Vibration
  - Operational Vibration
- Population and Housing
  - Project-Related Growth
  - Introduction of Unplanned Infrastructure
- Public Services
  - Fire Protection and Emergency Services
  - Sheriff Protection
  - Parks and Recreation
  - Schools
  - Libraries
- Transportation and Parking
  - CMP Transportation System
  - Public Transit and Alternative Transportation
  - Access and Circulation
  - Parking Supply
- Utilities and Service Systems
  - Water
  - Wastewater
  - Solid Waste