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COUNTY OF LOS ANGELES

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ADOPTED
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COUNTY OF LOS ANGELES

21 June 17, 2025

EDWARD YEN
EXECUTIVE OFFICER

June 17, 2025

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

DELEGATE AUTHORITY FOR THE NEGOTIATION AND EXECUTION OF A LEASE LEASE-BACK AGREEMENT AND DISBURSEMENT AGREEMENT FOR THE LOS ANGELES GENERAL HOSPITAL AND WEST CAMPUS STABILIZATION PROJECT; DELEGATE AUTHORITY FOR NEGOTIATION AND EXECUTION OF A GRATIS LEASE FOR THE VIP COMMUNITY MENTAL HEALTH CENTER AT CENTRAL JUVENILE HALL (SUPERVISORIAL DISTRICT 1) (3 VOTES) FISCAL YEAR 2024-2025

SUBJECT:

Approval of the recommended actions will authorize the Director of the Department of Economic Opportunity (DEO), in coordination with the Chief Executive Officer (CEO), to proceed with activities related to the Los Angeles General Hospital and West Campus Stabilization Project (Stabilization Project) as well as related recommended actions.

IT IS RECOMMENDED THAT THE BOARD:

1. Certify that the Addendum to the previously certified Final Environmental Impact Report for the LAC+USC Medical Center Campus Master Plan has been completed in compliance with the California Environmental Quality Act and reflects the independent judgment and analysis of the Los Angeles County Board of Supervisors (Board); find that the Board has reviewed and considered the information contained in

the Addendum, which includes the Stabilization Project and LA General Hospital Campus Lease Lease-Back Agreement (Lease Agreement), together with the Final Environmental Impact Report prior to approving the Project, as well as other recommended actions herein.

2. Authorize the Director of DEO, or her designee, to proceed with the General Hospital and West Campus Stabilization Project (Stabilization Project) with a total project budget of $120,380,000.

3. Authorize and delegate authority to the Director of DEO, or her designee, to negotiate, execute, and if necessary, amend, the General Hospital and West Campus Stabilization Disbursement Agreement (Disbursement Agreement) with Centennial Partners, (Developer), to provide funding in an amount up to $106,285,000 for the Stabilization Project.

4. Delegate authority to the Director of DEO, or her designee, to negotiate, execute, and if necessary, amend, a Lease Lease-Back Agreement (Lease Agreement), and any other ancillary documents, with Centennial Partners, (Developer) for the Stabilization Project and to enforce all terms of the Disbursement Agreement and Lease Agreement.

5. Authorize and delegate authority to the Director of DEO, or her designee, to negotiate, execute, and if necessary, amend, sole-source contracts with third party entities to provide consultant Project Management, Construction Management, and Seismic Peer-Review services associated with activities on the LA General Campus.

6. Find, pursuant to Government Code section 26227, that providing a gratis lease (Gratis Lease) of Building A/B C/D at the County's Central Juvenile Hall, located at 1605 Eastlake Ave., Los Angeles (the Premises), to the VIP Community Mental Health Center, Inc., a nonprofit corporation (VIP), to relocate its mental health services program from the West Campus, is necessary to meet the social needs of the County and the general public, and serves a public purpose, and that during the proposed Gratis Lease term, the Premises will not be needed for County use.

7. Delegate and authorize the CEO, or her designee, to negotiate and enter into a 10-year Gratis Lease of the Premises, with two five-year extensions, with VIP, after approval as to form by County Counsel, on the condition that VIP make tenant improvements necessary for occupation of the Premises at its sole cost and expense, operate its program on the Premises, and maintain its nonprofit status for the duration of the Gratis Lease.

8. Authorize the CEO, or her designee, to negotiate, execute and/or consent to any other ancillary documentation, approved as to form by County Counsel, which may be necessary to effectuate the proposed Gratis Lease and improvements to the Premises, including right of entry permits, and to take any other actions necessary and appropriate to implement activities relating to relocating VIP to the Central Juvenile Hall site, as contemplated in the proposed Gratis Lease and this Board letter.

9. Determine that the Stabilization Project shall be deemed a "Covered Project" within the County's Community Workforce Agreement (CWA) and per Amendment No. 1 to the CWA, the Stabilization Project is to be added to the CWA, and authorize Centennial partners, or their County-approved designee (Developer) to perform all administrative duties of the County that are required to be performed by the CWA for the Project.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION:

Background

In April 2022, the CEO provided to the Board a Feasibility Study, which explored options to restore and reuse the General Hospital and portions of West Campus (Project Site), located at 1200 North State Street, Los Angeles, CA 90033. The 'Reuse Framework' included in the Feasibility Study proposed a Public Private Partnership (P3) model to facilitate redevelopment of the Project Site into a mixed-use campus that incorporated local community priorities and embodied Supervisor Hilda L. Solis' vision to create a Healthy Village to serve the County's most vulnerable residents.

On January 24, 2023, the Board authorized DEO to solicit proposals to advance this vision. The successful proposer, Centennial Partners' (Developer) proposal outlined a vision to cultivate a mixed-use neighborhood inclusive of affordable, workforce and market rate housing, community retail, job creation opportunities, public open space, access to wellness and wrap-around supportive services, and connections to public transit. On June 25, 2024, the Board authorized DEO to enter into an amended Exclusive Negotiations Agreement with the Developer.

Stabilization Project Description

Over the past year, significant site constraints have been discovered through the Developer's due diligence activities—preliminary architectural and engineering studies, site investigation, mapping, testing activities, and code compliance verifications—which highlight the immediate need to advance maintenance and stabilization efforts of the General Hospital building and portions of the West Campus, separate from any potential future project that may subsequently be recommended to the Board. The following summarizes the various components of the Stabilization Project.

Seismic Retrofit of General Hospital

In 2024, the Department of Public Works (DPW) completed the Los Angeles General Medical Center General Hospital Structural Improvements Project, with a budget of $2,072,000, which consisted of structural improvements to various columns throughout the basement floor and the first floor of the LA General Hospital building. This Stabilization Project would provide further improvements to minimize the risk of building collapse and support life safety regardless of potential future use of the hospital building. The Stabilization Project would further enhance General Hospital's seismic performance, beginning with interior cleanout and demolition (and associated abatement efforts) of non-essential and non-historical elements to expose structural components. With an exposed structure, the Developer would be able to refine structural designs, increase fidelity of cost estimates and schedule, and preempt unforeseen conditions during construction of seismic improvements. The building must be completely vacated prior to the start of interior demolition.

Seismic improvements to the General Hospital building would include foundation upgrades, strategically placed new structural walls, and strengthened columns and beams at existing stair cores up to the second floor. These upgrades would not only strengthen the structure and reduce movement during a seismic event but also help prevent costly damage and preserve the building's historic character.

Work would be completed in a manner that protects and preserves historic and cultural resources and complies with the County's high-rise non-ductile concrete ordinance. All improvements would be carried out in alignment with the Secretary of the Interior's Standards for the Treatment of Historic Properties, under supervision of a qualified historic architect and/or consultant and with review and approval of the State Historic Preservation Office. Character-defining features would be preserved and treated in consultation with the State Office of Historic Preservation and National Park Service.

Pending Stabilization Project approval, the Department of Health Services (DHS) would relocate all staff from the Project Site, and anticipates fully vacating the General Hospital building by Spring 2026. The Developer would be required to work in coordination with DHS, Department of Medical Examiner, Department of Public Health, and Department of Mental Health to ensure continued functionality of the campus including but not limited to trash disposal, warehouse delivery, and preservation of DHS' ability to maintain and repair the facilities on campus that remain under their proprietorship. To ensure continuity of hospital and campus operations, the County would be required to approve a Continuity of Campus Operations Plan prior to the initiation of any construction activities included in the proposed Stabilization Project.

VIP Community Mental Health Center

To accommodate the Stabilization Project, a portion of DHS' current operations would relocate to County-owned facilities on the West Campus, some of which are currently being leased and

occupied by a third-party County tenant, Violence Intervention Program – Community Mental Health Center (VIP), a nonprofit that provides mental health, crisis intervention, and medication support services to children and their families who have been victims of domestic violence and/or child abuse (Program). VIP will vacate a portion of their West Campus operations and services will be relocated to Building A/B C/D at the nearby vacant Central Juvenile Hall campus pursuant to a Gratis Lease with VIP. Minor interior renovations such as repairs and upgrades to interior furniture, fixtures, and equipment will be undertaken at Building A/B C/D to prepare the facility to provide outpatient clinical services and case management services, at VIP's expense.

Wellness Center Relocation

The Wellness Center is a non-profit community-based organization, which is currently located on the ground floor of General Hospital and offers free programs and services focusing on improving the health and well-being of residents in the surrounding communities. The Wellness Center would be relocated to the Forecourt Buildings to the northwest of General Hospital, with tenant improvements facilitated by DHS, with support from the Developer, prior to the start of construction of the Stabilization Project, pursuant to a Gratis Sublease with the Developer for the duration of the implementation of the Stabilization Project.

West Campus Demolition of Building and Structures

The Developer's due diligence also confirmed that the majority of buildings, utility infrastructure, maintenance and storage sheds, temporary trailers, barracks and warehouses on the West Campus (east of Mission Boulevard) primarily consist of structures that are inefficient or obsolete. Nearly all structures have reached the end of their useful life, requiring repairs so extensive and costly that they outweigh the benefits, while their layouts and designs are obsolete and ill-suited for current uses.

Removing structurally compromised and functionally obsolete buildings and structures would reduce ongoing liability, streamlines site logistics, allows for safer circulation and access across the campus. Removing these structures would eliminate ongoing costs associated with buildings that no longer serve a functional purpose yet still require maintenance, security, and pest control. A phased demolition of up to 18 buildings and structures, executed in collaboration with DHS, is a critical step in stabilizing West Campus. The Pharmacy Building and Viaduct are not currently proposed for demolition.

While the majority of the buildings and structures being considered for demolition are vacant, some house support functions or supplies for the adjacent LA General Medical Center. Suitable relocation options, separate from the Stabilization Project, are currently being vetted by DHS in collaboration with DEO, CEO, and the Developer.

West Central Plant Decommissioning and Demolition and Installation of New Heating and Cooling Equipment

The West Central Plant, originally constructed in the 1960s, with partial refurbishments in 2013, was designed to provide central heating and chilled water to several buildings both on and off the campus. The plant now struggles to meet current demand from the General Hospital building, Interns and Residents building, Out-patient building, the Medical Examiner's building, and Central Juvenile Hall. The cooling tower system requires regular maintenance. Additionally, the make-up water connections are in poor condition, further compromising system reliability. The steam boiler system, consisting of gas-fired boilers installed in 2013, is similarly constrained. While operating at reduced capacity to mitigate energy waste, the piping system is highly inefficient. The leaky steam tunnels are marked as unsafe for repair while operational, further underscoring the unsustainability of the current operations. Given the high cost of maintaining the plant, its performance and safety concerns, and the fact that many of its systems are nearing end of life, the plant should be decommissioned and a new, modern replacement system provided.

After new building-specific units are fully installed and tested at facilities to ensure that essential services remain uninterrupted, the West Central Plan would be decommissioned and demolished.

Demolition of Site Infrastructure, Remediation, and Accessibility Upgrades at West Campus

The campus' complex and aging utility network requires strategic reconfiguration. The Developer will complete a comprehensive utility survey to identify which utilities remain in use, which may be abandoned in place, and which should be removed or re-rerouted. Some conduits or piping may be suitable for reuse, but their alignment and condition must be assessed. The decommissioning of obsolete or hazardous infrastructure would be necessary to eliminate potential risks and "right size" systems to meet the uses that are to remain on the campus. The rerouting and replacement of utilities would include reconnection of critical water, power, sanitary, and stormwater systems to reflect the revised site configuration and needs of the remaining active buildings in a manner that meets current code requirements.

Additionally, the Developer would advance site investigations to address subsurface hazardous materials risks. Geotechnical testing would be expanded beyond the previously studied zones to provide a consistent West Campus-wide understanding of soil behavior, liquefaction risks, and corrosivity. Concurrently, early testing for hazardous materials, including asbestos, lead, and hydrocarbons, would be conducted, specifically in areas identified as contaminated or containing legacy medical and industrial waste. If hazardous materials are identified, the Developer would prepare a remediation plan and advance efforts such as soil removal, encapsulation, regrading, and compacting or other mitigation strategies as necessary to protect public health and comply with regulatory requirements.

Lastly, the Developer would construct new ADA-compliant circulation pathways throughout the campus to improve access to key facilities, particularly between parking areas and operational medical buildings. These improvements, along with those listed above, would enhance safety and navigability across the campus and improve site hydrology. Together, remediation, utility realignment, and new circulation infrastructure represent proposed foundational steps to stabilize the campus.

Lease Lease-Back Agreement

Pursuant to Government Code Section 25371, the County is authorized to ground lease real property parcels to the Developer to implement the proposed Stabilization Project in the most timely and cost-effective manner. Accordingly, it is recommended that the County lease the Project Site to the Developer, who would contract for, manage, and supervise the design and construction of the proposed Stabilization Project to be performed by a construction entity retained by the Developer and approved by the County. The Developer anticipates that construction activities related to the Stabilization Project will be completed within 24 months from the start of construction.

Upon completion of the Stabilization Project, the County would sublease via lease-back the Project Site from the Developer for $1.00, during which time the Developer would retain responsibility for securing and maintaining the Project Site. The term of the Lease Agreement would be ten (10) years, with the County having the option for an early termination.

The Lease Agreement would not bind the County to provide funding beyond what is detailed in the Disbursement Agreement, for the Stabilization Project.

General Hospital Stabilization Project Disbursement Agreement

To facilitate payment of Stabilization Project expenditures incurred for design and implementation, it is recommended that your Board delegate authority to the Director of DEO or her designee to enter into a Disbursement Agreement between the County and the Developer. DEO would allocate up to $106,285,000 to the Developer for implementation of the Stabilization Project and to fulfill the lease terms, which would be inclusive of funds to secure and maintain the property during the term of the agreement. Continued ongoing maintenance activities include general cleaning, debris removal, landscaping, and pest control.

The Disbursement Agreement will include provisions that the Developer submit monthly invoices and be paid for progress associated with implementation of the Stabilization Project. DEO would review all work for completeness, compliance, and quality.

The County would reserve $9,030,000 in owner-directed contingency and $5,065,000 for County management costs.

FISCAL IMPACTS/FINANCING

The total aggregate budget for the LA General Campus is estimated at $130,937,000. Prior committed project expenditures for activities preceding the Stabilization Project are estimated at $10,557,000 for the Feasibility Study, structural improvements, due diligence activities, and other board-authorized activities funded by the General Hospital West Campus Project, Capital Project No. 87883 and Los Angeles General Medical Center General Hospital Structural Improvements Project, Capital Project No. 87958.

The proposed Stabilization Project budget is $120,380,000. The Stabilization Project would be funded with the following sources: $43,100,000 remaining from the $50,000,000 California State Department of Housing and Community Development Grant currently held in the County Trust Account TK7-7383 (TK7-7383); $55,000,000 from obligated fund balance Committed for American Rescue Plan Act (ARP)-Enabled Capital Programs; $1,678,000 of First Supervisorial District Discretionary Funds (Community Project Funding); and an aggregated total of $20,602,000 net County cost (NCC), currently budgeted in the General Hospital West Campus Project, Capital Project No. 87883 and the LA General MC General Hospital Structural Improvements Project Capital Project No. 87598.

DEO would oversee the State Revenue held in TK7-7383 and will appropriate other funds listed above in future budget cycles and adjustments as needed, as described below. The $55,000,000 in the obligated fund balance, committed for ARP-Enabled Capital Programs; the $1,678,000 of First Supervisorial District Discretionary Funds; the residual balance in the General Hospital West Campus Project, Capital Project No. 87883; and the residual balance in the LA General MC General Hospital Structural Improvements Project, Capital Project No. 87598 would be transferred to DEO, as needed, in future budget cycles and adjustments.

The proposed Gratis Lease of the Premises to VIP would be at no cost to VIP. VIP would make necessary tenant improvements under the terms of the lease to the Premises at its sole cost and expense.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

Pursuant to Government Code Section 25371, the County is authorized to ground lease real property parcels to the Developer to implement the proposed Stabilization Project in the most timely and cost-effective manner. The proposed Lease Agreement would include various Board-mandated provisions, including but not limited to compliance with the County's Community Workforce Agreement, as well as the County's Local Hiring and Disadvantaged Business Enterprise requirements.

DEO anticipates presenting to the Board a recommendation regarding a separate agreement governing the potential future development and construction of the Project Site at a later date.

Pursuant to Government Code Section 26227, the Board has the authority to make available real property not needed for County purposes to non-profit entities for operation of programs which serve public purposes and are necessary to meet the social needs of the population of the County. To accommodate the relocation of DHS staff and to ensure the continuity of VIP's services to the community, the Premises, consisting of the entire building of approximately 40,405 square feet, which will not be needed for County use during the Gratis Lease term, would be made available pursuant to a 10-year gratis lease, with two five-year extensions. Pursuant to the proposed Gratis Lease, VIP would make the tenant improvements necessary for occupation of the Premises at its sole cost and expense, operate on the Premises and maintain its nonprofit status for the duration of the Gratis Lease.

ENVIRONMENTAL DOCUMENTATION

An addendum to the previously certified Final Environmental Impact Report for the LAC+USC Medical Center Campus Master Plan (EIR) has been prepared for the proposed revised Project in compliance with CEQA and the County's environmental guidelines. The impacts of the proposed Stabilization Project, the proposed VIP lease and other recommended actions herein are included in the Addendum and certified EIR. Based on the Addendum, the previously certified EIR, and other materials in the record, the County determines that the Stabilization Project falls within the impacts analyzed in the EIR because the Stabilization Project will create no new significant impacts; no substantial increase in severity of the previously identified significant impacts; no substantial increase in severity of previously identified significant effects; no mitigation measures or alternatives previously found to be infeasible but are not determined to be feasible and no mitigation measures or alternatives that are different from those in the EIR. Thus, neither a subsequent nor supplemental environmental impact report is required (Pub. Resources Code, Section 21166; State CEQA Guidelines Sections 15162 and 15163). However, some changes or additions are necessary to the EIR in order to implement the Stabilization Project and VIP Gratis Lease and other recommended actions herein, making the Addendum the appropriate CEQA document for the Project (Pub. Resources Code, Section 21166; State CEQA Guidelines Section 15162). The previously approved Findings, Statement of Overriding Considerations and Mitigation Monitoring and Reporting Plan approved at the time of certification of the EIR continue to apply.

The previously certified EIR, certified Addenda and related environmental documents are available and can be viewed at 510 S Vermont Avenue, Los Angeles, CA 90020 as well as at the following link: https://opportunity.lacounty.gov/re-imagine-general-hospital/. The location and custodian of the documents and other materials constituting the record of the proceedings in the certified EIR and Addendum, upon which the Board's decision is based in this matter is DEO, located at 510 S Vermont Avenue, Los Angeles, CA 90020. The custodian of the records is Krystin Hence, Assistant Director Capital Development.

Upon the Board's approval of the recommended actions, DEO will file a Notice of Determination with the County Clerk and with the State Office of Land Use and Climate Innovation in

accordance with California Public Resources Section 21152 and will post the Notice to the County's website in accordance with Section 21092.2

IMPACT ON CURRENT SERVICES (OR PROJECTS)

The proposed Stabilization Project would support the stabilization of the General Hospital building and portions of the West Campus, create improved safety and health conditions on campus, and protect and improve the resiliency of a County-owned asset in a historically disadvantaged area.

CONCLUSION

Should you have any questions, please contact Krystin Hence, Assistant Director, Capital Development, at khence@opportunity.lacounty.gov.

Respectfully submitted,

KELLY LOBIANCO
Director

KL:JK:KH:nm

Attachments

c: Chief Executive Office
Executive Office, Board of Supervisors
County Counsel

County of Los Angeles

LA COUNTY GENERAL HOSPITAL & WEST CAMPUS STABILIZATION PROJECT

June 2025 | EIR Addendum

PLACEWORKS

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June 2025 | EIR Addendum

THIRD ADDENDUM TO THE LAC+USC MEDICAL CENTER CAMPUS MASTER PLAN (SCH NO. 2014051061)

LA COUNTY GENERAL HOSPITAL & WEST CAMPUS STABILIZATION PROJECT

County of Los Angeles

Prepared for:

County of Los Angeles
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1. ENVIRONMENTAL CHECKLIST

1. **Project Title:** LA County General Hospital (LACGH) & West Campus Stabilization Project
2. **Lead Agency Name and Address:**
   County of Los Angeles
   Los Angeles County Department of Economic Opportunity
   510 South Vermont Street
   Los Angeles, CA 90020
3. **Contact Person and Phone Number:**
   Krystin Hence, Assistant Director, Capital Development
4. **Project Location:** LAC + USC Medical Center Campus
   1200 N State Street
   Los Angeles, CA 90033
5. **Project Sponsor's Name and Address:**
   Centennial Partners
   9950 Jefferson Boulevard, Building 2
   Culver City, CA 90232
6. **General Plan Designation:** Public Facilities
7. **Zoning:** Public Facilities
8. **Description of Project:**

   The County would enter into a Lease-Lease Back Agreement with a developer who would undertake the Proposed Stabilization Project, which includes four stabilization components — 1) maintenance and seismic retrofit of the General Hospital Building; 2) demolition of hazards and structures on the West Campus; 3) modifications to site infrastructure, accessibility, and hazards on the West Campus; and 4) decommissioning and demolition of the West Central Plant – and the relocation of operations for the Violence Intervention Program – Community Mental Health Center (VIP CMHC) from the West Campus to Building A/B C/D at the Central Juvenile Hall campus located off-site. See Section 3, *Project Description*, below. Refer to Appendix A for a detailed description of the stabilization components.
9. **Surrounding Land Uses and Setting:**

   The Project Site, which is within the overall LAC+USC Medical Center Campus and includes Building A/B C/D at the Central Juvenile Hall campus, is located in the City of Los Angeles

and is primarily surrounded by the Boyle Heights, Lincoln Heights, Chinatown, and El Sereno neighborhoods of the City of Los Angeles. The Central Juvenile Hall campus is located northeast of the LAC+USC Medical Center Campus and is associated with the address 1605 Eastlake Avenue. The surrounding uses include low- to mid-density residential, industrial, commercial, medical, institutional, and public facility uses.

To the north are Light and Heavy Industrial, Public Facilities, and Medium Density Residential uses; to the west are a mix of Low-Medium Density Residential, Commercial, and Public Facilities uses; to the east are Public Facilities and Commercial uses; to the south are a mix of Open Space, Commercial, and Medium Density Residential uses. The surrounding zones are designated Commercial (C2), Light Industrial (M2), Heavy Industrial (M3), Medium Density Residential (R2, R3), Low Medium Density Residential (RD1.5), Low Density Residential (R1), and Open Space (OS). Building A/B C/D is within one-quarter mile of the Project site identified for the Approved Project; therefore, Building A/B C/D shares the same surrounding uses.

The nearest off-site sensitive receptors are residences located 0.04-mile southwest of the Project Site. Other sensitive receptors include the LAC+USC Medical Center Campus uses immediately south and an off-site school located 0.13-mile east of the Project Site.

With respect to the General Hospital, the buildings surrounding the General Hospital include support spaces for the Wellness Center within the General Hospital (Patient's Building), visitor's building, modular trailers, Parking Lot 12, barracks, mini warehouse, control house, outpatient building, and Interns and Residents Dormitory (IRD) Building.

10. Other Public Agencies Whose Approval Is Required:
None.

2. INTRODUCTION

2.1 BACKGROUND, PURPOSE, AND SCOPE

This document is an addendum to the LAC+USC Medical Center Campus Master Plan Environmental Impact Report (EIR) (State Clearinghouse No. 2014051061) that was certified on November 18, 2014 (2014 Master Plan EIR) by the Los Angeles County Board of Supervisors as governing body of the County of Los Angeles. The Los Angeles County Board of Supervisors approved the 2014 Master Plan Project, Findings of Fact and Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program (MMRP) on November 18, 2014. This is the third Addendum to the 2014 Master Plan EIR. This Addendum has been prepared in accordance with Section 21166 of the Public Resources Code which is included in the California Environmental Quality Act (CEQA) and Sections 15162 and 15164 of the State CEQA Guidelines. The County of Los Angeles (County) is the lead agency that approved the LAC+USC Medical Center Campus Master Plan (Approved Project) and certified the 2014 Master Plan EIR, and is the lead agency for this Addendum to the 2014 Master Plan EIR.

The 2014 Master Plan EIR analyzed the environmental impacts associated with buildout of the Approved Project, which included the construction of new and renovated medically related office, retail, open space, and parking uses and demolition of existing buildings and structures on the LAC+USC Medical Center Campus to accommodate new development. Under the 2014 Master Plan EIR, full buildout of the Approved Project could result in a total of approximately 1,725,000 square feet of development throughout the LAC+USC Medical Center Campus. The main elements of the master plan included the following.

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

The objectives of the Approved Project which were identified in the EIR were to:

- Achieve a community-friendly campus.

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

A critical component of the 2014 Master Plan was to alleviate navigational challenges:

- Create an "assisted grade transition" (with use of an escalator, for example) to improve accessibility between the existing courtyard of the LAC+USC Replacement Hospital and the upper Outpatient Department (OPD) clinic building.
- Use elevators within the proposed parking structures west of State Street to provide an accessible route from Marengo Street to Wellness Center at the historic General Hospital.
- Modify the slope of the hillside west of the historic General Hospital entry plaza and connect the proposed public-serving amenities at the base of the hill to the historic plaza with use of escalators.

The project analyzed in this Addendum includes several stabilization components within the General Hospital and West Campus of the LAC+USC Medical Center Campus (Proposed Stabilization Project). The improvements in the West Campus include demolition of hazards and structures, site remediation, infrastructure and accessibility improvements, and decommissioning and demolition of the West Central Plant (WCP). The activities associated with the components located in the West Campus are within the scope of work analyzed in the 2014 Master Plan EIR. The Proposed Stabilization Project also includes activities associated with the seismic retrofit and general maintenance of the General Hospital. These activities within the General Hospital were not explicitly analyzed in the 2014 Master Plan EIR; however, the 2014 Master Plan EIR did assume that the setting of the General Hospital, which includes the General Hospital building, would be modified with the implementation of the Approved Project. The seismic retrofit and maintenance activities proposed for the General Hospital include selective demolition to remove non-essential and non-historic elements. The seismic retrofit construction activities would be temporary and would not alter the physical appearance or affect the historical significance of the General Hospital, as discussed in this Addendum.

The purpose of this Addendum is to evaluate whether the Proposed Stabilization Project would modify the Approved Project, as amended by the refinements to the Approved Project analyzed in the two previously certified addenda (see Section 2.3, *Prior Environmental Documentation*), in such a way as to result in new environmental impacts or a substantial increase in the severity of previously identified significant effects or would otherwise trigger a need for subsequent environmental review under CEQA. Section 2.2, *Environmental Procedures*, outlines the criteria identified in State CEQA Guidelines Section 15162 that trigger the need for new CEQA

compliance documentation. Additionally, Section 5, *Findings*, provides analysis regarding the Proposed Stabilization Project in relation to the criteria.

As discussed in detail in Section 2.3, *Prior Environmental Documentation*, two addenda were prepared that analyzed refinements to the Approved Project and were presented in 2017 and 2023. The project analyzed in 2017 proposed three new facilities that would be developed on the LAC+USC Medical Center Campus that were not in the 2014 Master Plan and EIR: 1) a 96-bed recuperative care facility, 2) a 64-bed crisis residential treatment program facility, and 3) a new childcare facility. The proposed project included two other changes to the 2014 Master Plan: 1) relocation of the proposed new central utility plant from a site south of Zonal Avenue to a site just to the southwest, and 2) a 20 percent reduction in the 635,000 square feet of research and development space that was projected under the 2014 Master Plan.

The project analyzed in 2023 proposed new components on the LAC+USC Medical Center Campus that were not in the 2014 Master Plan and EIR: 1) one two-story 33,650 square foot (sf) mental health urgent care center and residential withdrawal management facility; 2) one four-story 115,420 sf and 128-bed psychiatric subacute facility; and 3) surface parking lot with 55 spaces around the new buildings.

Neither the 2017 project nor the 2023 project proposed changes related to the improvements to the on-campus circulation as identified in the 2014 Master Plan. Circulation improvements under both the 2017 project and the 2023 project assumed circulation improvements would continue in accordance with the 2014 Master Plan.

2.2 ENVIRONMENTAL PROCEDURES

Pursuant to CEQA (Public Resources Code Sections 21000 et seq.), the State CEQA Guidelines, and the County's Environmental Document Reporting Procedures and Guidelines (County Guidelines) (adopted November 1987), this Addendum focuses on whether implementation of the Proposed Stabilization Project would require major revisions to the 2014 Master Plan EIR due to the potential for new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Pursuant to Public Resources Code Section 21166 and Section 15162 of the State CEQA Guidelines, when an EIR has been certified or a negative declaration adopted for a project, no subsequent or supplemental EIR need be prepared for the project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of 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:

    - The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    - 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. (CEQA Guidelines Section 15162[a]).

A supplement to an EIR (supplemental EIR), which is narrower in scope than a subsequent EIR, may be prepared if any of the above criteria apply but “only minor changes or additions would be necessary to make the previous EIR adequately apply to the project in the changed situation” (State CEQA Guidelines Section 15163(a)). In the absence of the need to prepare either a subsequent or supplemental EIR, an addendum to a previously Certified EIR may be prepared. Section 15164 states:

1. 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.
2. An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

3. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
4. The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
5. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence (CEQA Guidelines Section 15164).

This evaluation is consistent with County Guidelines Section 705, Tiering, which states that agencies are encouraged to tier EIRs to eliminate repetition and focus the discussion at each level of environmental review. As the level of detail increases, the EIR should be limited to the effects not discussed previously. In other words, each report should just focus on the impacts that are new or more specific to the level of planning analyzed.

This Addendum demonstrates that the Proposed Stabilization Project would not result in any of the conditions outlined in CEQA Guidelines Sections 15162(a)(1) to (3). The proposed changes would not be substantial changes that would require major revisions to the 2014 Master Plan EIR, and they would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects that would require major revisions to the 2014 Master Plan EIR. This Addendum demonstrates that there are no substantial changes with respect to circumstances that would require major revisions to the 2014 Master Plan EIR or substantially increase the severity of previously identified significant effects. Thus, the impacts of the Proposed Stabilization Project are within the scope of environmental impacts disclosed in the 2014 Master Plan EIR.

Also, no information that was not known and could not have been known at the time the 2014 Master Plan EIR was prepared has come to light that shows new or substantially greater significant impacts would result (see CEQA Guidelines Section 15162[a][3]). The Proposed Stabilization Project would not introduce new or different mitigation measures that would substantially reduce one or more significant impacts of the Approved Project but that are not adopted. Additionally, as documented in the LAC+USC Medical Center General Hospital Reuse and Protective Storage Plan (2010) as described below, the need to conduct seismic and stabilization efforts at the General Hospital Building predates the 2014 Master Plan EIR and does not constitute new information. The Proposed Stabilization Project does not identify or require adoption of any further mitigation measures beyond those in the 2014 Master Plan EIR.

This Addendum provides the substantial evidence required by CEQA Guidelines Section 15164(e) to support the finding that a subsequent or supplemental EIR is not required and that an addendum to the 2014 Master Plan EIR is the appropriate environmental document to address changes associated with the Proposed Stabilization Project. Since this Addendum does not identify new or substantially greater significant impacts, circulation for public review and

comment is not required (CEQA Guidelines Section15164[c]). The County will consider this Addendum, including a Mitigation Monitoring and Reporting Program that reflects the applicable previously adopted mitigation measures from the 2014 Master Plan EIR, at a public County Board of Supervisors hearing, together with the previously 2014 Master Plan EIR, prior to the adoption of the Proposed Stabilization Project (CEQA Guidelines Section 15164[d]).

2.3 PRIOR ENVIRONMENTAL DOCUMENTATION

It should be noted that name of the medical center campus has since changed to the Los Angeles General Medical Center Campus. The Los Angeles County Board of Supervisors approved the name change during their meeting on Tuesday, May 2, 2023. However, this Addendum will continue to use the original name so that continuity of environmental documentation is clear.

2.3.1 LAC+USC Medical Center Replacement EIR (1999)

In 1999 an Environmental Assessment / Environmental Impact Report (1999 EA/EIR) was prepared for the LAC+USC Medical Center Replacement Project by the County and Federal Emergency Management Agency (FEMA). The EA/EIR was certified by the Los Angeles County Board of Supervisors, and Findings of Fact and a Statement of Overriding Considerations and a Mitigation Monitoring and Reporting Program were adopted by the Los Angeles County Board of Supervisors on June 6, 2000.

The LAC+USC Medical Center Replacement Project proposed the redevelopment of the LAC+USC Medical Campus and associated facilities in response to severe damage caused by the 1994 Northridge earthquake as well as aging and obsolescent facilities (1999 project). The 1999 EA/EIR identified four key LAC+USC Medical Center facilities that suffered significant structural damage—General, Pediatric, Psychiatric, and Women's and Children's Hospital. The purpose of the 1999 project was to significantly improve the seismic performance of structurally damaged general acute care hospital facilities so they were more likely to be operational immediately following an earthquake. The 1999 project proposed to maintain existing patient care and educational, research, and community service programs at LAC+USC Medical Center Campus while replacing existing damaged facilities and constructing a replacement hospital facility. The 1999 project proposed to close the General Hospital by 2008, vacate the building, and maintain the building in accordance with the Department of Interior's standards regarding historic buildings.

The 1999 EA/EIR analyzed the impacts of redeveloping the LAC+USC Medical Center Campus and associated facilities. The 1999 EA/EIR determined that the 1999 project would result in significant and unavoidable impacts related to air quality and noise during the 1999 project's

construction phase. The 1999 EA/EIR determined that all other environmental topics would result in either less than significant impacts or less than significant with mitigation incorporated.

Regarding Cultural Resources, the 1999 EA/EIR (see Page 228) concluded that, since adaptive use/rehabilitation of General Hospital will likely be delayed in excess of one year from decommissioning as a hospital under OSHPD authority, the building must be maintained according to provisions in the most recent issue of *Preservation Brief 31: Mothballing Historic Buildings* (National Park Service, U.S. Department of the Interior). Because of compliance with the Standards for any adaptive use or rehabilitation of General Hospital—during construction or after decommissioning as a hospital under OSHPD authority—and maintenance according to the noted Preservation Brief, as necessary, it was anticipated that the project would have no adverse effect. Use of the Standards and maintenance procedures would reduce impacts to a level of insignificance allowing for a finding of no adverse effect. The 1999 EA/EIR included the following Mitigation Measures:

- Future adaptive use/rehabilitation of General Hospital after decommissioning shall comply with the Secretary of the Interior's Standards for Rehabilitation (Standards, 36, Code of Federal Regulations (CFR) § 67.7). As provided in Section 106 regulations (36 CFR § 800.9 (c)(2)), compliance with the standards would have no adverse effect.

- Prior to reuse, the General Hospital shall be maintained and preserved, described in *Preservation Brief 31: Mothballing Historic Buildings.* Measures would include, among others:

  - *Document*
    - Document the architectural and historical significance of the building.
    - Prepare a condition assessment of the building.

  - *Stabilize*
    - Structurally stabilize the building, based on a professional condition assessment.
    - Exterminate or control pests, including termites and rodents.
    - Protect the exterior from moisture penetration.

  - *Maintain*
    - Secure the building and its component features to reduce vandals, break-ins and natural disasters.
    - Provide adequate ventilation to the interior.
    - Secure or modify mechanical systems and utilities.
    - Develop and implement a maintenance and monitoring plan for protection (see Table 1, *Sample Maintenance Chart*).

Table 1 Sample Maintenance Chart	
Periodic ☐ Regular drive by surveillance ☐ Check attic during storms if possible	Every six months; Spring and Fall ☐ Site clean-up; pruning and trimming ☐ Cutter and downspout check ☐ Check crawl space for pests ☐ Clean out storm drains
Monthly Walk Arounds ☐ Check entrances ☐ Check window panes for breakage ☐ Mowing as required ☐ Check for graffiti or vandalism	Every 12 Months ☐ Maintenance contract inspections for equipment/utilities ☐ Check roof for loose or missing shingles ☐ Termite and pest inspection/treatment ☐ Exterior materials spot repair and touch up paining ☐ Remove bird droppings or other stains from exterior ☐ Check and update building file
Enter every three months to air out ☐ Check for musty air ☐ Check for moisture damage ☐ Check battery packs and monitoring equipment ☐ Check light bulbs ☐ Check for evidence of pest intrusion	

2.3.2 LAC+USC Medical Center General Hospital Reuse and Protective Storage Plan (2010)

In 2010, the County prepared a Reuse and Protective Storage Plan to meet the Phase II requirements outlined in the 2000 Memorandum of Agreement (MOA) (Ken Kurose Architect 2010). The report relied on guidance from *Preservation Brief 31: Mothballing Historic Buildings* to develop a stabilization and mothballing plan for the main General Hospital building. Other historical resources in the Area of Potential Effects (APE) were excluded from the report.

As part of the report, a building conditions assessment was prepared to summarize existing conditions of the building structure and systems. The General Hospital building was found to generally be in good physical condition with systems exhibiting a high level of functionality and efficiency. Seismic retrofit of the elevator tower addition was recommended.

Historic features on each wing of the General Hospital building, including circulation spaces, interior spaces, and materials, were evaluated for integrity and classified as having either low,

moderate, or high integrity. Several unique spaces and character-defining features were identified, including the lobby, rehabilitation pool, pharmacy, trauma ward, kitchen, cafeteria, chapel, library, morgue, surgery auditorium, surgery areas, circulation space, and curved floor and wall edges. Typical alterations on each floor were identified as addition of walls to circulation space, addition of walls within circulation space, false ceilings, modification of rooms for office use, elevator tower addition, and additional alterations to patient rooms on the ends of outlying wings and nurse's stations. Recommendations and guidelines were developed for both the occupied and unoccupied floors at the building, and the General Hospital was found to exhibit a high overall integrity for a building of its type and age, with most significant spaces generally also retaining high integrity.

The stabilization and mothballing plan was developed using a comprehensive conditions assessment and recommendations. Stabilization work to be completed was classified as immediate, near term, or long term. Table 2, *Stabilization Scope Priorities*, summarizes the stabilization plan.

Table 2 Stabilization Scope Priorities

Area	Priority Level	Scope
Exterior Concrete	Immediate	East elevation public safety
Exterior Concrete	Long-Term	Full restoration of remaining elevations, including east elevation
Windows	Near-Term	Remedial glazing repair and/or sealing on all elevations
Windows	Long-Term	Rehabilitation of windows on all elevations
Roofing	Immediate	Corrective/maintenance repairs
Roofing	Long-Term	New maintenance system
Roofing	Long-Term	Roof replacement
Roofing	Long-Term	Drain replacement
1969 Elevator Tower	Long-Term	Study of treatment options for 1969 elevator tower

Mothballing was recommended "to be executed prior to closure of mothballed floors to control long-term deterioration of the building while it is unoccupied." Recommendations were described for mechanical, electrical, and plumbing systems (including heating, ventilation, air conditioning, and medical gas); vertical systems (stairs, elevators); and general building attributes (occupancy, fire protection system and fire watch, hazardous materials). A maintenance and monitoring plan was also provided following guidance in Preservation Brief 31.

2.3.3 LAC+USC Medical Center Campus Master Plan EIR (2014)

On November 18, 2014, the Los Angeles County Board of Supervisors approved the Master Plan for the LAC+USC Medical Center Campus, certifying the EIR, Findings of Fact, a Statement of Overriding Considerations, and a MMRP. The 2014 Master Plan EIR analyzed the impacts of implementation of a master plan for the LAC+USC Medical Center Campus, which included the construction of new and renovated medical-related office, retail, open space, and parking uses and demolition of existing buildings and structures to accommodate new development. Full buildout of the 2014 Master Plan could result in a total of approximately 1,725,000 square feet of development throughout the campus. As previously identified, the main elements of the 2014 Master Plan included the following.

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

With respect to demolition and new development, the 2014 Master Plan EIR analyzed:

- Removal of 31,000 square feet (sf) of maintenance facilities and 20,938 sf of utility plant and cooling towers.
- The construction of 40,000 sf of new utility plant and maintenance facility.
- Demolition of 457,727 sf of outpatient clinic/laboratories/medical offices.
- Demolition of 197,288 sf of administrative office space.
- Demolition of 15,756 sf of warehouse and storage trailers.
- 200,000 sf of outpatient clinics/laboratories/medical offices
- 265,000 sf of professional and administrative offices
- 635,000 sf of research and development space
- 450 new hospital beds in three new 150-bed towers
- 85,000 sf of wellness-oriented meeting space and community-serving space
- 20,000 sf of wellness-oriented retail space

In total, the 2014 Master Plan EIR evaluated demolition of 722,709 sf of uses. A critical component of the 2014 Master Plan was to alleviate navigational challenges:

- Create an "assisted grade transition" (with use of an escalator, for example) to improve accessibility between the existing courtyard of the LAC+USC Replacement Hospital and the upper OPD clinic building.
- Use elevators within the proposed parking structures west of State Street to provide an accessible route from Marengo Street to Wellness Center at the historic General Hospital.
- Modify the slope of the hillside west of the historic General Hospital entry plaza and connect the proposed public-serving amenities at the base of the hill to the historic plaza with use of escalators.

It should be noted, and as further discussed in Section 4.9*, Hazards and Hazardous Materials*, of this Addendum, the 2014 Master Plan EIR assumed that with the implementation of mitigation measures MM-HAZ-2 and MM-HAZ-3 site investigations and remediation activities across the campus, apart from the General Hospital Building, would occur prior to construction. The 2014 Master Plan EIR also assumed relocation of 2,992 employees that work on the campus. The construction activities analyzed in the 2014 Master Plan EIR included the demolition of numerous structures, including the old utility and maintenance facility, OPD building, IRD building, Parking Structures 10 and 12, Women's and Children's Hospital Building, several modular buildings, and storage and warehouse buildings and excavation to lay foundation for new buildings. Staging areas for construction were assumed to be in the LAC+USC Medical Center Campus. The Approved Project was never implemented on the campus, apart from the demolition of the Women's and Children's Hospital Building.

The 2014 Master Plan EIR made the following determinations:

NO IMPACT OR LESS THAN SIGNIFICANT IMPACT

The 2014 Master Plan EIR determined that implementation of the Approved Project would not result in impacts to Agriculture and Forestry Resources and Mineral Resources. Additionally, the Approved Project would result in less-than-significant impacts to Land Use and Planning, and Population and Housing.

LESS THAN SIGNIFICANT IMPACT WITH MITIGATION MEASURES

The 2014 Master Plan EIR determined that the Approved Project would require the implementation of mitigation measures to reduce potentially significant impacts to less-than-significant levels for Biological Resources, Geology and Soils, Public Services, Hazards and Hazardous Materials, and Hydrology and Water Quality. Identified mitigation measures would reduce impacts to less than significant.

SIGNIFICANT AND UNAVOIDABLE IMPACT

The 2014 Master Plan EIR determined that impacts related to Aesthetics (scenic resources) during construction and operation, Air Quality (pollutant concentrations) during construction, Cultural Resources (historic resources) during construction and operation, Greenhouse Gas Emissions (GHG emissions) during operation, Noise (excessive noise levels, vibration, and increase in ambient noise) during construction, Recreation (construction of recreational facilities) during construction, Transportation (conflicts with the circulation system) during operation, and Utilities and Service Systems (water supply and wastewater treatment) during operation were significant and unavoidable.

As previously discussed, Findings of Fact and Statement of Overriding Considerations were adopted by the Board of Supervisors for the 2014 Master Plan EIR

IMPACTS NOT ANALYZED

The 2014 Master Plan EIR did not separately analyze impacts to Energy, Tribal Cultural Resources, or Wildfire because these topics were added to Appendix G of the CEQA Guidelines after the 2014 Master Plan EIR was certified.

The requirement to evaluate impacts to tribal cultural resources in CEQA documents was implemented subsequent to completion of the 2014 Master Plan EIR. Assembly Bill (AB) 52 went into effect on July 1, 2015, and applies to projects for which a Notice of Preparation (NOP) was filed on or after July 1, 2015. The Notice of Preparation (NOP) for the 2014 Master Plan EIR was published May 19, 2014, and therefore, the lead agency was not required to comply with the requirements of AB 52.

Although the CEQA Guidelines Appendix G topics of Energy and Wildfire were not included as standalone sections within the 2014 Master Plan EIR, the Approved Project's impacts related to these topics were included in other sections. Specifically, the topic of energy was discussed in the Greenhouse Gas Emissions and Utilities and Services sections of the 2014 Master Plan EIR, and fire hazards were discussed in the Hazards and Hazardous Materials section of the 2014 Master Plan EIR.

Although energy efficiency and conflicts with an energy plan was not analyzed in the 2014 Master Plan EIR, energy demand and use were analyzed and it was determined that impacts would be less than significant. Similarly, while wildfire impacts were not specifically addressed in the 2014 Master Plan EIR, impacts related to fire hazards were disclosed and the 2014 Master Plan EIR determined that impacts related to fire hazards would be less than significant.

2.3.4 First Addendum to the 2014 LAC+USC Medical Center Campus Master Plan EIR (2017)

The information provided in this section is provided for informational purposes related to the CEQA Documentation history for the Approved Project. The modifications to the 2014 Approved Project analyzed in the First Addendum to the 2014 Master Plan EIR (2017 Addendum) are unrelated to the Proposed Stabilization Project because Proposed Stabilization Project addresses structures that were existing at the time the 2014 Master Plan EIR was prepared. As summarized below, the 2017 Addendum analyzed impacts related to the construction and operation of three new structures; relocation of a utility plant; and reduction in research and development square feet. It should be noted that at the time the 2017 Addendum was prepared, no elements of the 2014 Approved Project had been implemented.

In 2017, the County proposed the Recuperative Care and Crisis Residential Care Centers Project (2017 project), in response to Los Angeles County Department of Health Services initiatives and Los Angeles County Board of Supervisors motions targeted at addressing the social and medical needs of the homeless and most vulnerable populations in the County, the County proposed the development of new recuperative care and crisis residential treatment program facilities on the LAC+USC Medical Center Campus and other changes to the 2014 Master Plan.

The 2017 project proposed three new facilities that would be developed on the LAC+USC Medical Center Campus that were not in the 2014 Master Plan and EIR: 1) a 96-bed recuperative care facility, 2) a 64-bed crisis residential treatment program facility, and 3) a new childcare facility. The proposed project included two other changes to the 2014 Master Plan: 1) relocation of the proposed new central utility plant from a site south of Zonal Avenue to a site just to the southwest, and 2) a 20 percent reduction in the 635,000 square feet of research and development space that was projected under the 2014 Master Plan. The 2017 project did not propose changes to the proposed improvements to the on-campus circulation as identified in the 2014 Master Plan. Circulation improvements would continue in accordance with 2014 Master Plan.

The County determined that the 2017 project would not result in new significant impacts or substantially more severe significant impacts than those described in the 2014 Master Plan EIR. Additionally, there were no mitigation measures or alternatives in the 2014 Master Plan EIR that were identified as infeasible, and there were no mitigation measures or alternatives that were previously identified as infeasible and are now feasible, but had been rejected by the County.

Pursuant to Section 15168(e) of the State CEQA Guidelines, the County of Los Angeles determined that the 2017 project was within the scope of the Master Plan approved in November 2014 and that the 2014 Master Plan EIR adequately described the activities for the purposes of CEQA.

On December 19, 2017, the Los Angeles County Board of Supervisors certified the 2017 Addendum for the Recuperative Care and Crisis Residential Care Centers Project. At the time this Addendum was prepared, the construction of this project was on-going.

2.3.5 Second Addendum to the LAC+USC Medical Center Campus Master Plan (2023)

The information provided in this section is provided for informational purposes related to CEQA Documentation history for the Approved Project. The modifications to the Approved Project analyzed in the Second Addendum to the 2014 Master Plan EIR (2023 Addendum) are unrelated to the Proposed Stabilization Project because Proposed Stabilization Project addresses structures that were existing at the time the 2014 Master Plan EIR was prepared. As summarized below, the 2023 Addendum analyzed impacts related to the construction and operation of two new structures and a surface parking lot. It should be noted that at the time the 2023 Addendum was prepared, no development elements of the 2014 Approved Project had been implemented; the Women's and Children's Hospital was demolished in 2021.

In 2023, the County proposed new components as part of the Psychiatric Subacute Facility Mental Health Urgent Care Center Residential Withdrawal Management Facility Project for the Master Plan (2023 project), to be constructed to Leadership in Energy and Environmental Design (LEED) Gold minimum standards.

- Two-story, 33,650 sf building to contain:
  - 15,770 sf Mental Health Urgent Care Center on the first floor, with 32 adult and 8 adolescent chairs and no beds.
  - 17,880 sf Residential Withdrawal Management Facility on the second floor, with 32 beds.
- Four-story, 115,420 sf, 128-bed Psychiatric Subacute Facility.

Additionally, surface parking (approximately 55 spaces) would be provided around the buildings. The 2023 project was limited to the site of the former Women's and Children's Hospital (approximately 4.5 acres). 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 project did not propose changes to the on-campus circulation improvements as identified in the 2014 Master Plan. Circulation improvements were assumed to continue in accordance with 2014 Master Plan.

The County determined that the 2023 project would not result in new significant impacts or substantially more severe significant impacts than those described in the 2014 Master Plan EIR. Additionally, no mitigation measures or alternatives in the 2014 Master Plan EIR were now

identified as infeasible, and no mitigation measures or alternatives that were previously identified as infeasible were now feasible but were rejected by the County.

Pursuant to Section 15168(e) of the CEQA Guidelines, the County of Los Angeles determined that the 2023 project was within the scope of the Master Plan approved in November 2014 and that the 2014 Master Plan EIR adequately described the activities for the purposes of CEQA.

On December 19, 2023, the Los Angeles County Board of Supervisors certified the 2023 Addendum for the Psychiatric Subacute Facility Mental Health Urgent Care Center Residential Withdrawal Management Facility Project. At the time this Addendum was prepared, the construction of this project was on-going.

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3. PROJECT DESCRIPTION

3.1 PROJECT LOCATION AND SETTING

3.1.1 Project Location

The Project Site, which is within the overall LAC+USC Medical Center Campus, is in the Northeast Los Angeles Community Plan area of the City of Los Angeles and owned by the County of Los Angeles (see Figure 1, *Regional Location*). Therefore, though the Project Site is in the City, it is owned and maintained by the County and is not subject to City of Los Angeles zoning regulations. The Project Site includes Building A/B C/D within the Central Juvenile Hall campus located immediately northeast of the LAC+USC Medical Center Campus. All stabilization components of the Proposed Stabilization Project are on the same site evaluated in the 2014 Master Plan EIR. General Hospital is at 1200 North State Street, Los Angeles (Assessor's Parcel Number 5201-001-901) and fronts State Street to the west, Zonal Avenue to the north, the OPD Building and IRD Building to the east, and the LAC+USC Medical Center and Marengo Street to the south. The Central Juvenile Hall campus is at 1605 Eastlake Avenue, Los Angeles (Assessor's Parcel Number 5201-003-906). The Project Site is just east of Interstate (I)-5 (Golden State Freeway) and north of I-10 (San Bernardino Freeway) (see Figure 2, *Local Vicinity*). The Project Site is primarily surrounded by the Boyle Heights, Lincoln Heights, Chinatown, and El Sereno neighborhoods of the City of Los Angeles. The surrounding uses include low- to mid-density residential, industrial, commercial, medical, institutional, and public facility uses. It should be noted that the nearest residences to the Project Site are located off-site, 0.04-mile southwest. Other sensitive receptors including hospitals and school are located immediately south, off-site but within the LAC+USC Medical Center Campus, and off-site 0.13-mile east, respectively. The surrounding uses are the same as those identified in the 2014 Master Plan EIR because the stabilization components of the Proposed Stabilization project are within the boundaries of the Project Site identified for the Approved Project. Additionally, Building A/B C/D is within one-quarter mile of the Project site identified for the Approved Project; therefore, Building A/B C/D shares the same surrounding uses.

The stabilization component specifically includes the General Hospital building and parts of the West Campus (see Figure 3, *Aerial Photograph*).

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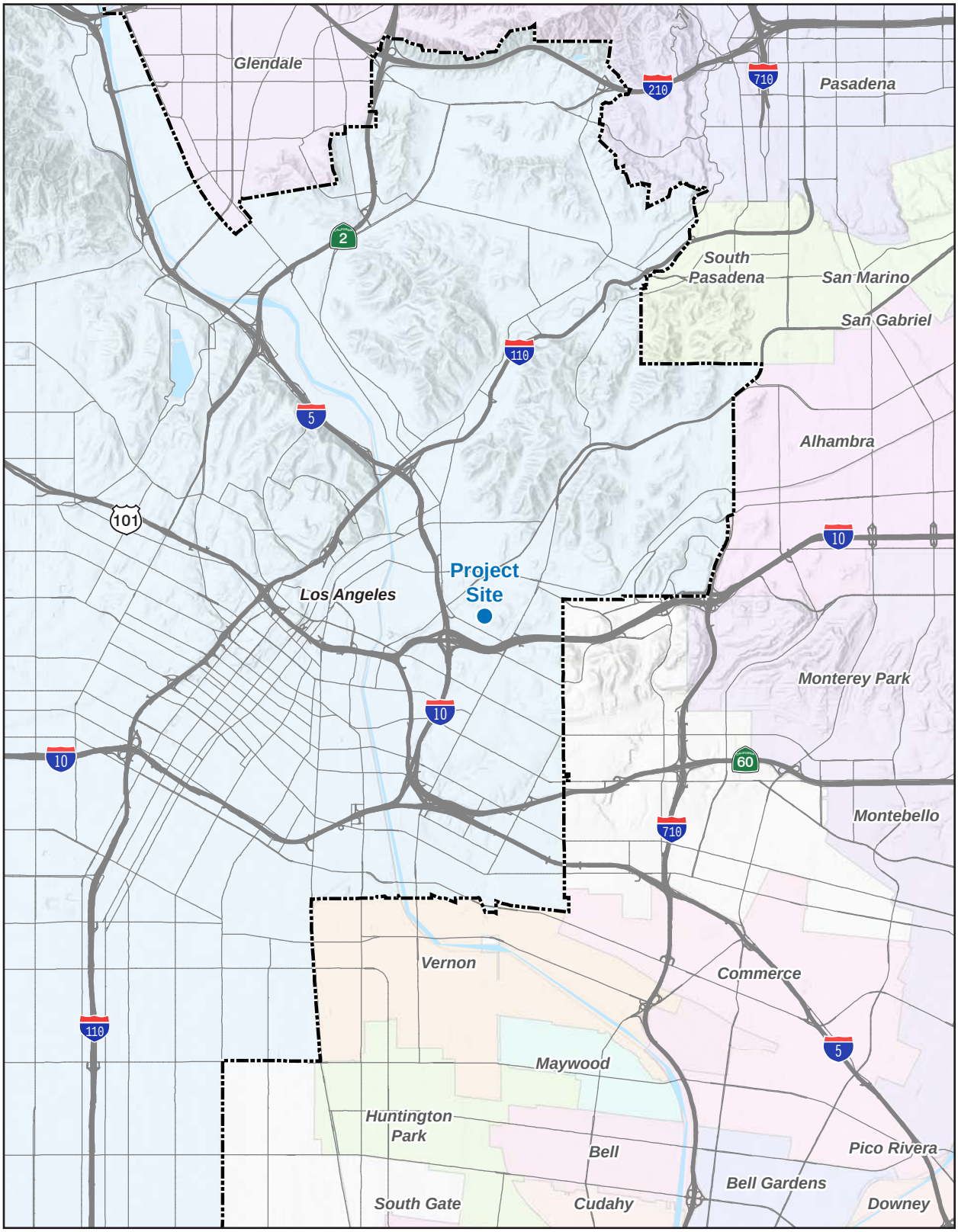
Figure 1 - Regional Location



City Boundary

Note: Unincorporated county areas are shown in grey.
Source: Generated using ArcMap 2025.

0 1.5
Scale (Miles)

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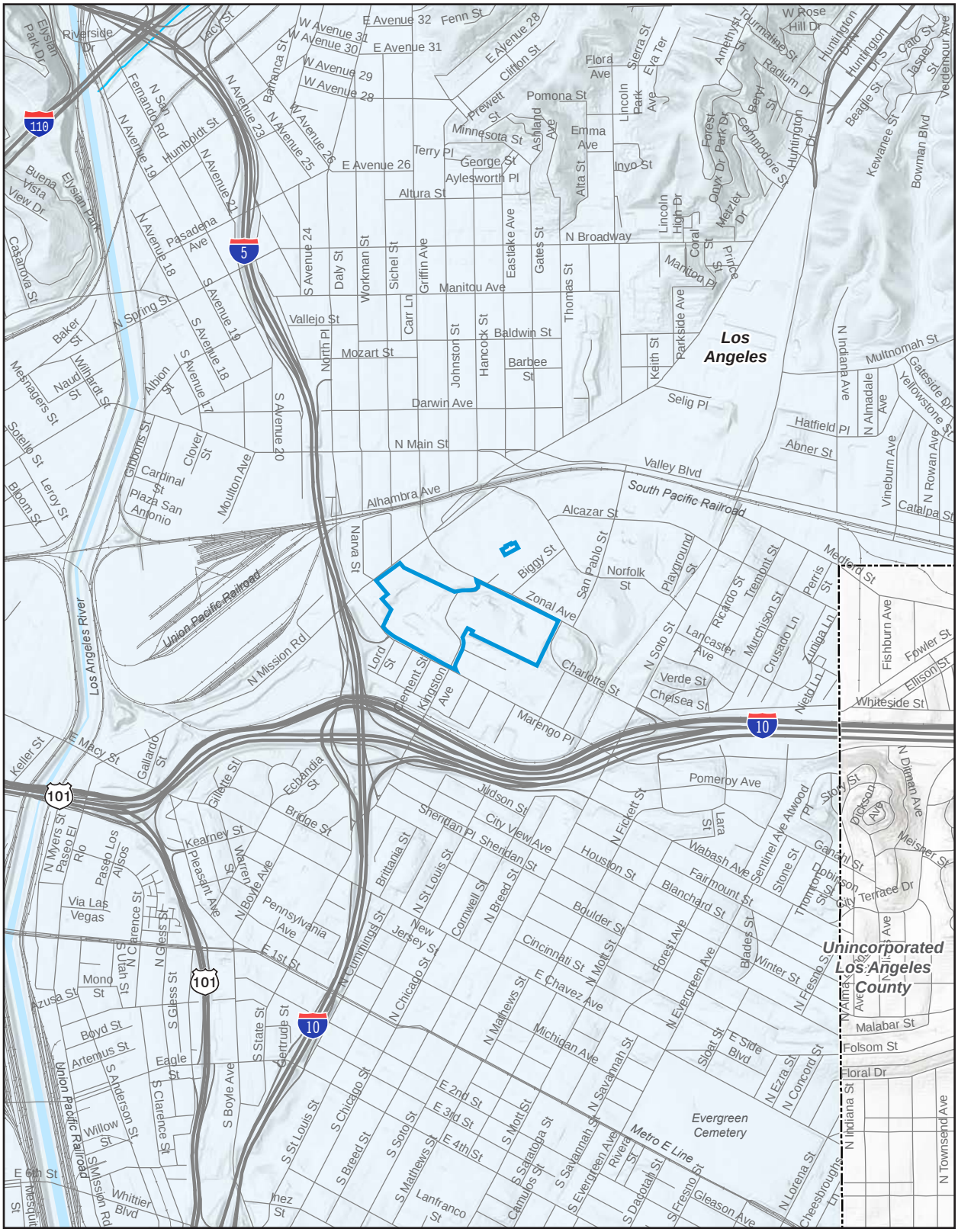
Figure 2 - Local Vicinity



City Boundary

Project Boundary

Note: Unincorporated county areas are shown in grey.

Source: Generated using ArcMap 2025.

0 2,000
Scale (Feet)

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Figure 3 - Aerial Photograph

Project Boundary

0 675
Scale (Feet)

Source: Nearmap 2025.

The Project Site has a City of Los Angeles General Plan land use designation of Public Facilities. To the north are Light and Heavy Industrial, Public Facilities, and Medium Density Residential uses; to the west are a mix of Low-Medium Density Residential, Commercial, and Public Facilities uses; to the east are Public Facilities and Commercial uses; to the south are a mix of Open Space, Commercial, and Medium Density Residential uses. The Project Site has a City of Los Angeles zoning designation of Public Facilities (PF-1), and the surrounding zones are designated Commercial (C2), Light Industrial (M2), Heavy Industrial (M3), Medium Density Residential (R2, R3), Low Medium Density Residential (RD1.5), Low Density Residential (R1), and Open Space (OS).

3.1.2 Site Conditions

Pedestrian and Circulation Access

Vehicular access to the LAC+USC Medical Center Campus is provided from State Street, Mission Road, Marengo Street, and Zonal Avenue. State Street is the only roadway that cuts through the center of the campus. According to the 2014 Master Plan, the existing topography of the campus is difficult for pedestrians to navigate.

The Approved Project included a pedestrian circulation and access element to improve circulation and alleviate pedestrian navigation challenges throughout the campus. The Approved Project included improvements to State Street, Mission Road, Marengo Street, and Zonal Avenue and included additional parking.

General Hospital

General Hospital was originally completed in 1933 and contains 20 levels (19 plus basement) of former medical uses, containing approximately 1.2 million square feet of developed space. General Hospital was built along with two administrative buildings, a gatehouse, and a utility tunnel and bridge. Several modular structures have been added at the historic entry plaza as well as north, south, and east of General Hospital. General Hospital is eligible for listing on the National Register of Historic Places (NRHP), and the County is currently undertaking the process to formally list the building as a historical resource on the NRHP. The General Hospital is listed on the California Register of Historical Resources (CRHR) and is included in the Built Environment Resource Directory (BERD) for Los Angeles County.

With the exception of five levels (basement to level 4), the 20-story General Hospital Building is largely unoccupied. The Wellness Center and the Center Auxiliary for Recruitment, Education, and Services (CARES) occupy the first floor. Other uses include building services and maintenance staff; Los Angeles County Department of Health Information Management;

Nursing Human Resources; USC Anesthesia; Autopsy/Morgue; Emergency Medical Space; the Library; and Medical Records. Between 500 and 800 people are typically in the building daily. Levels 5 through 19 are unoccupied and not operational.

The original construction is a dual-system design, composed of a steel beam-column frame "skeleton" and a reinforced concrete pier and spandrel "exoskeleton" that constitutes the historic façade. The steel frame is the primary gravity-resisting system, and the pier-and-spandrel façade is the primary system resisting lateral forces. This dual structural system offers "structural redundancy," which improves the margin against collapse in an earthquake. The existing building is stiff compared to other buildings of similar construction and vintage, in part due to the well-distributed pier-and-spandrel façade. This helps restrain building movement in an earthquake and moderate the amount of costly structural and nonstructural damage.

The mechanical, electrical, and plumbing systems in the General Hospital are outdated and in poor condition, rendering them unsuitable for adaptive reuse. Originally designed for healthcare functions, many components have long surpassed their expected service life and are now failing. The cooling and ventilation systems are deteriorating, so the building lacks a centralized cooling system but relies on inefficient window air conditioners from the 1990s. Many ventilation fans are either rusted or no longer operational. The electrical system, dating back to the 1960s, is outdated. It has suffered flood damage and still relies on outdated generators and inefficient lighting that fails to meet current standards. Similarly, the plumbing system is in a state of disrepair. Sewer lines are rusting, cold-water pipes are heavily calcified, and the water storage tank is corroded. Additionally, the gas piping and backflow preventers are inadequate. The building's water softening system is rusted and no longer functional. Circulatory infrastructure such as wiring, ducts, and pipes are also deteriorated.

As identified in Appendix A, the General Hospital is classified as a Risk Category III structure, which are buildings and other structures that represent a substantial hazard to human life in the event of failure. Asbestos and lead have been found in drywall, flooring, insulation, ceilings, and roofing of the General Hospital. Additionally, there is possible contamination of the soil from the former medical and industrial uses.

West Campus

West Campus is in the area west of State Street, across from the General Hospital, and includes 12 acres with 22 buildings. West Campus includes the Los Angeles County Coroner's facilities, on-grade and structural parking, and large open areas with a number of support buildings. Many of these buildings are one-story modular buildings and in poor physical condition that do not effectively support operation of the campus. Some are not fully functional; therefore, several campus programs are currently being housed in temporary buildings or trailers. The pharmacy building and gatehouse are on the southwest corner of West Campus.

At the southwest corner of Mission Road and Zonal Avenue is the former site of the demolished Women's and Children's Hospital (now a vacant lot). West Campus has aging infrastructure, with sitewide utilities originating from the WCP, which operates with significant capacity loss and unsafe conditions. There is a 1.6-acre utility easement area in the location of a former stream area that was since relocated underground. There is contamination in the West Campus due to historical medical and industrial use.

WEST CENTRAL PLANT

The WCP encompasses three buildings: 1) large cooling towers, 2) outbuilding, and 3) main utility plant. The WCP, built in 1962 with partial refurbishments in 2013, currently supplies power to the Intern and Residents building, Outpatient Department, Medical Examiner Building, and parts of the General Hospital. During the preparation of the 2014 Master Plan EIR, ICF conducted a field survey and found that the WCP was ineligible for listing in the National or California Registers. The WCP was designed to provide central heating and chilled water to several buildings both on- and off-site; however, the WCP struggles to meet the demands of the current infrastructure. Studies indicate the WCP is operationally inefficient. There are leakages in the steam system tunnels that lose about 50 percent of the steam, and the plant is oversized for the current load.

The WCP's chilled water system includes three 700-ton chillers, one of which serves as a standby unit. Although these chillers were replaced in 2013 and remain in generally serviceable condition, they are not operating at full capacity. While the chillers are estimated to have 10 to 13 years of remaining useful life.

The cooling tower system—an essential component of the WCP—originates from the facility's original 1962 construction. Although the fans were replaced in 2013, the towers themselves are only in fair condition and require ongoing maintenance. Moreover, the make-up water connections are in poor condition, further undermining system reliability.

The steam boiler system, consisting of gas-fired boilers installed in 2013, is similarly constrained. While operating at reduced capacity to mitigate energy waste, the boilers are tied to a deteriorating network of original 1962 steam pipes. This piping system is highly inefficient, with up to 50 percent of capacity lost to leaks during operation, resulting in fines from the city for energy waste. The leaky steam tunnels are marked as unsafe for repair while operational, further underscoring the unsustainability of the current setup.

The Approved Project included the decommissioning, demolition, and relocation of the WCP to elsewhere on the LAC+USC Medical Center Campus. Additionally, both the 2017 and 2023 projects assumed that the WCP would be decommissioned, demolished, and relocated to elsewhere within the LAC+USC Medical Center Campus.

GENERAL LABORATORY BUILDING

The General Laboratory Building was built in 1967 and contains two levels and approximately 24,978 total square feet. It has a stucco exterior finish and a flat roof with asphalt covering. It is currently not in use due to flood damage.

PARKING STRUCTURE 10

Parking Structure 10 was built in approximately 1971 and primarily supported the Women's and Children's Hospital. Since that hospital was demolished, Parking Structure 10 is now primarily used by staff of the medical examiner, visitors to the campus, Los Angeles County Department of Mental Health (DMH) staff, Recuperative Care Village (RCV) staff and visitors, Los Angeles County Department of Health Services (DHS) employees, nursing students, and Wellness Center staff. This structure provides approximately 809 parking spaces at 5 levels with a total square footage of 326,578. It is in fair to poor condition.

The parking structure was built with a steel frame system and relies on precast concrete planks spanning tapered steel girders that are supported by wide flange columns. Lateral resistance is provided by precast concrete plank diaphragms and inverted "V" steel braces; however, several gusset plates are not adequately connected to the beams, compromising their functionality. The foundation consists of concrete piles, but their varying depths between 20 and 37 feet pose inconsistencies. An interior concrete masonry wall runs longitudinally but is disconnected from the floor slabs, rendering it ineffective as a lateral force-resisting element. Significant structural deficiencies were observed, including extensive concrete cracking and deteriorating corroded rebar, and inadequate connections in the lateral system.

The Approved Project included the demolition of Parking Structure 10. Additionally, both the 2017 and 2023 projects assumed that Parking Structure 10 would be demolished.

MAINTENANCE AND STORAGE SHEDS, MODULAR BUILDINGS, WAREHOUSE BUILDINGS, AND TEMPORARY TRAILERS

West Campus includes various storage and warehouse buildings and temporary trailers. Two pharmacy trailers, three annex buildings, a mason shop, various warehouse buildings, tram shops, and temporary housing trailers are found within West Campus. These buildings are currently used for offices, conferencing, and storage for staff members. Tram Shop Storage & Presser Washer Building is a one-level structure used to store supplies, charge tram batteries, clean the trams, and other services. These buildings range from poor to fair condition.

The Approved Project included the demolition of several structures, including modular buildings, maintenance facilities, and warehouse and storage trailers. Both the 2017 and 2023 projects assumed these types of structures would be demolished.

LANDSCAPE AND OPEN SPACE

Currently, the campus landscape and open spaces consist largely of a fragmented collection of underutilized areas shaped by the existing building layout and natural topography. While some zones—such as the historic General Hospital forecourt garden and adjacent terrace areas—are occasionally activated for events like farmers markets, outdoor movie screenings, and community festivals, most spaces lack consistent engagement. High-traffic areas, including the drop-off zones at the clinical tower, inpatient tower, and outpatient courtyard, are regularly used, though vehicular circulation tends to dominate these spaces. During lunchtime, areas like the Tranquility Garden and sloped lawn attract diners, yet outside of these peak times, pedestrian activity is primarily limited to patients awaiting transportation or individuals passing through the campus. Inconsistent landscaping, non-native plantings, and scattered amenities contribute to a lack of cohesion.

The Approved Project included community open space and landscape elements to be implemented throughout the campus.

VIOLENCE INTERVETION PROGRAM – COMMUNITY MENTAL HEALTH CLINIC (VIP CMHC)

Portions of the West Campus are currently being leased and occupied by a third-party County tenant, Violence Intervention Program – Community Mental Health Center (VIP), a nonprofit that provides mental health, crisis intervention, and medication support services to children and their families who have been victims of domestic violence and/or child abuse.

Building A/B C/D at Central Juvenile Hall Campus

Building A/B C/D within the Central Juvenile Hall campus is located outside of the boundaries identified in the 2014 Master Plan EIR for the Approved Project. Building A/B C/D was constructed in 2003 and was occupied until July 2023. The building's fire alarm and closed circuit television system was installed in 2020; however, the remaining equipment is original.

3.2 DESCRIPTION OF THE PROPOSED STABILIZATION PROJECT

3.2.1 Implementation of the Approved Project to Date

The 2014 Master Plan EIR anticipated that construction activities within the LAC+USC Medical Center Campus would occur over a 25-year period, with elements of the Approved Project being built as the funding for each element is appropriated. The project as described in the 2014

Master Plan EIR has not been implemented except for the demolition of the Women's and Children's Hospital Building.

The 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. With respect to the components addressed in the 2017 Addendum and 2023 Addendum, these components are currently under construction.

3.2.2 Proposed Stabilization Project

The County would enter into a Lease-Lease Back Agreement with a developer who would undertake the Proposed Stabilization Project, which includes four stabilization components. Three of the components are within the scope of impacts and impact boundary analyzed in the 2014 Master Plan EIR for the Approved Project— demolition of select structures on the West Campus; modifications to site infrastructure, accessibility, and hazards on the West Campus; and decommissioning and demolition of the West Central Plant. The Proposed Stabilization Project proposes a maintenance and seismic retrofit component specifically to address the immediate building integrity needs of the General Hospital Building, which was not assumed in the 2014 Master Plan EIR. The proposed maintenance and seismic retrofit of the General Hospital is a modification to the Approved Project. Although the proposed maintenance and seismic retrofit of the General Hospital is a new component, the proposed activities would occur within the Project Site boundaries identified in the 2014 Master Plan EIR, comply with the Approved Project's objectives (see Table 4), and ensure the preservation of one of the LAC+USC Medical Center Campus' most prominent historic resources to preclude any additional substantial effects on historic resources. Additionally, the Proposed Stabilization Project would result in the demolition of two additional buildings (General Laboratory and Mason Shop) that were not specifically identified for demolition in the 2014 Master Plan EIR. The Proposed Stabilization Project would also include long-term maintenance and other related activities within the campus, consistent with the 2014 Master Plan EIR.

The Proposed Stabilization Project also includes the relocation of operation of the VIP CMCH within the West Campus to Building A/B C/D at the Central Juvenile Hall campus located adjacent to the Project Site.

Provided below is a description of the four stabilization components and the VIP CMCH relocation. For a detailed description of the four stabilization components, refer to Appendix A.

Stabilization Components

GENERAL HOSPITAL: MAINTENANCE AND SEISMIC RETROFIT

In 2025, Holmes US (structural engineer) conducted a preliminary seismic analysis of the General Hospital that identified multiple seismic vulnerabilities, including its brittle façade, a pier-and-spandrel system with limited ability to accommodate earthquake movement; discontinuous load paths at piers, stairs, and elevator core walls; and brittle cast-in-place concrete stair connections.

Clean Out, Remediation and Selective Demolition

Employees from the General Hospital would be vacated from the building and current active uses (Wellness Center) would be relocated to the Forecourt prior to commencement of this effort. In implementation, prior to the start of selective demolition, tenant improvements will be completed in buildings #102 (Patient's Building) #103 (Visitor's Building Administrative Offices) located on the General Hospital Forecourt to accommodate the relocation of the Wellness Center.

Following the full vacation of occupants from the General Hospital, the Proposed Stabilization Project would include the clean out and selective demolition scope of work to remove old furniture (including tables, chairs, wheel chairs, old medical operational facility furnishings, debris, cardboard boxes, trash, sandbags, storage containers, fans, tools, old documents, and office equipment) followed by non-essential and non-historical elements (including outdated/deteriorating mechanical, electrical, and plumbing systems, interior finishes, partition walls, flooring, ceilings, and other non-loadbearing components) while avoiding and preserving character defining features (including the historic lobby, library, and operating theater) and core structural components (such as load-bearing walls, columns, and foundational supports). This effort begins with detailed planning and design before progressing into implementation.

The Proposed Stabilization Project would establish a framework for selective demolition and related scopes including conducting an environmental survey, developing architectural concept plans, and establishing preservation guidelines along with preliminary soft demolition plans. Fire life safety and Americans with Disabilities Act code consultants would be engaged to ensure compliance with current regulatory standards.

All work completed as part of the maintenance and seismic retrofit of the General Hospital will be designed to be consistent with the 2010 Reuse and Protective Storage Plan (2010 Reuse Plan), which was reviewed and accepted by the California Office of Historic Preservation (OHP). The 2010 Reuse Plan was based on guidance contained in Preservation Brief 31: Mothballing Historic Buildings to develop a stabilization and mothballing plan for the main General Hospital building, also known as Acute Unit or Building 835. Consistent with the 2010 Reuse Plan and as

a project design feature, the proposed initial phase of work involving stabilization and structural retrofit of the General Hospital building shall conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI's Standards).

As concept or pre-design architectural and structural drawings for the stabilization of General Hospital are prepared, a qualified historic consultant shall review the drawings and provide early feedback to ensure that the designs conform with the 2010 Reuse Plan and the SOI's Standards. Preservation Briefs 17, 31, and 41 would continue to guide the proposed work. Structural concept or predesign drawings prepared for the stabilization of General Hospital would be peer reviewed by a qualified structural engineer with experience in historic preservation, with a peer review report prepared. Any recommendations contained in the peer review report would be further explored as the design progresses. The qualified historic preservation consultant would continue to engage in design collaboration through the development of schematic design drawings, at which point a conformance review report or memo would be prepared describing the project and its conformance with the 2010 Reuse Plan and SOI's Standards. If the schematic design drawings are found by the qualified historic preservation consultant to conform with the SOI's Standards.

During selective demolition, ongoing architectural observation and support would be provided and modifications would be limited to the interior footprint of the building and would not be visible from the exterior of the building.

Targeted Structural Strengthening and Seismic Retrofit

To improve safety for daily users of the LAC+USC Medical Center Campus, the Proposed Stabilization Project would fortify the structural integrity of the General Hospital through the proposed activities:

- Upgrade the building's foundation with new pillars
- Construction of targeted reinforcements
- Construction of super walls to address discontinuous wall members in the building's podium and lower floors, while engaging the transfer beams in the tower upper floors.

The proposed structural integrity upgrades would strengthen the building and would reduce seismic movement – ensuring preservation of the building's historic character and status. In planning and design, the Proposed Stabilization Project would include conducting a seismic risk analysis to evaluate the effectiveness of a range of retrofit concepts to determine which seismic retrofit supplements will be the best approach in improving the building's seismic performance. This analysis would compare each retrofit option against the current structural state, assessing their relative effectiveness in mitigating seismic risk, and would compare post-earthquake repair predictions. This analysis would provide critical data to inform decision-making on the most effective approach to strengthening the structure and develop the seismic retrofit design, and

will conclude with refined costs and construction sequencing, and a complete peer reviewed, third-party plan-checked, permit ready to issue full seismic retrofit documentation package.

In implementation, the Proposed Stabilization Project would advance the seismic retrofit with the addition of new reinforced concrete walls as overlays on existing walls and as new independent walls that can serve as demising walls. These walls help create a “stiff spline” to limit the amount of earthquake movement the existing façade will undergo during a large seismic event. New structural elements would be concentrated in strategic areas to avoid alterations to spaces of high historical significance and integrity. The super walls can be supplemented with a new super frame connecting the two concrete cores. This frame element improves the behavior of the building on the upper stories, decreasing the amount of displacement and thus improving the behavior of the building. In a most intensive scenario, they can be further supplemented with the addition of fluid dampers (large “shock” absorbers). The fluid dampers could not only help decrease the amount of displacement (like the super frame achieves) but could also help reduce floor accelerations which will in term limit the extent of damage to nonstructural elements.

Although the seismic retrofit improvements were not explicitly identified in the 2014 Master Plan EIR, the General Hospital is within the boundaries of the Project Site analyzed in the 2014 Master Plan and the 2014 Master Plan EIR assumed that work within the setting of the General Hospital could occur and mitigation measures were identified to reduce impacts on historic resources (see 2014 Mater Plan EIR pp. 3.4-25 – 3.4-26).

WEST CAMPUS: DEMOLITION OF HAZARDS AND STRUCTURES

The Approved Project included the demolition of several types of structures within the LAC+USC Medical Center Campus, including the Project Site.

The Proposed Stabilization Project includes the demolition of several buildings and structures (up to 23 structures) within the West Campus and surrounding the General Hospital building, including outbuildings, yards, warehouses, paved areas, and barracks. In planning and design, the Proposed Stabilization Project includes conducting a comprehensive environmental survey to assess site conditions and inform future work. The Proposed Stabilization Plan would pay close consideration to the preservation of existing trees. Specifically, the Proposed Stabilization Project would avoid removing oak trees (see Section 4.4, *Biological Resources*, of this Addendum). The development of plans would be guided by historic preservation guidelines, ensuring that all demolition and construction activities respect historic character and comply with applicable preservation standards. Table 3, *Select Buildings Proposed for Demolition*, identifies the structures proposed for demolition (see Figure 4, *Buildings Proposed for Demolition*).

Table 3 Select Buildings and Structures Proposed for Demolition

Building Name	Square Footage	Identified for Demolition in the 2014 Master Plan EIR? Yes/No
Shed 1 (Pharmacy Trailer) (Bldg. #503)	1,841	Yes
Shed 2 (Pharmacy Trailer) (Bldg. #538)	2,200	Yes
West Central Power Plant (Bldg. 516)	19,469	Yes
Barracks D Building (Bldg. #104)	2,690	Yes
Barracks G Building (Thrift Shop) (Bldg. # 105)	1,940	Yes
Trailer 1 (east)/Trailer 3 (west) (Bldg. #111)	8,620	Yes
Parking Structure 10 (Bldg. #410)	326,578	Yes
Trailer 15 (Bldg. #407)	2,588	Yes
Trailer 8 (Bldg. #408)	5,390	Yes
Trash Compactor (Bldg. #506)	483	Yes
Annex I, II, III (Bldg. #522, #523, #524)	2,850[1]	Yes
Mason Shop (Bldg. #529)	5,000	No
General Laboratory Building (Bldg. #302)	24,978	No
Trailer 17 (Bldg. #309)	4,656	Yes
Mini Warehouse Building (Supply Chain) (Bldg. #120)	27,899	Yes
Trailer 126 (Bldg. #112)	10,512	Yes
Tram Shop (Bldg. #528)	1,350	Yes
Tram Shop Storage and Presser Washer Building (Bldg. #536)	77	Yes
Total	**449,121**	--

1. 3 structures at 950 square feet each.

In implementation, the phasing of the demolitions will be strategic and pay particular consideration to “Parking Lot 10 (Bldg #410)”, “Mini Warehouse Building (Bldg #120)”, and “Trash Compactor (Bldg #506)”. Parking Lot 10 contains 809 spaces and is used by patients, visitors and staff. No physical work or demolition would occur until alternative parking has been identified. Additionally, the Mini Warehouse Building houses Department of Health Services (DHS) functions and no physical work or demolition would occur until an alternative location is identified. Finally, the Trash Compactor services key campus uses and no physical work or demolition would occur until a replacement has been constructed.

All but two buildings identified in Table 1 above were anticipated to be demolished under the Approved Project. Though not identified for demolition under the Approved Project, the General Laboratory Building (Bldg #302) was surveyed by ICF during the preparation of the 2014 Master Plan EIR and found ineligible for listing in the National and California Registers. Based on review of previous documentation and supplemental research, there is no new evidence that suggests the building would be considered a historic resource for the purposes of CEQA (ARG 2025). Additionally, the Mason Shop was constructed in 1997 and is not of historic age. It does not appear to be of exceptional importance and its recent construction precludes an evaluation of historical significance from a scholarly perspective (ARG 2025). Therefore, the General Laboratory and the Mason Shop are not considered historic resources under CEQA as further addressed in detail below (Section 4.5, *Cultural Resources*).

It should be noted that the 2014 Master Plan EIR identified that the Approved Project assumed relocation of 2,992 employees from the LAC+USC Medical Center Campus due to proposed building demolitions. It should be noted that no employees within General Hospital were included in the 2014 Master Plan EIR assumption. No staff have been relocated to date.

WEST CAMPUS: SITE INFRASTRUCTURE, REMEDIATION, AND ACCESSIBILITY

It should be noted, and as further discussed in Section 4.9, *Hazards and Hazardous Materials*, of this Addendum, the 2014 Master Plan EIR assumed that with the implementation of mitigation measures MM-HAZ-2 and MM-HAZ-3 site investigations and remediation activities across the campus, apart from the General Hospital Building, would occur prior to construction of the Approved Project. Additionally, one of the elements of the Approved Project included improving pedestrian circulation and access.

Utility Reconfiguration

The Proposed Stabilization Project includes the strategic reconfiguration of the Project Site's complex and aging utility network. In planning and design, the Proposed Stabilization Project would include conducting a comprehensive utility survey to identify which utilities remain in use, which may be abandoned in place, and which should be removed or rerouted. Some conduits or piping may be suitable for reuse, but their alignment and condition must be assessed. Additionally, the decommissioning of obsolete or hazardous infrastructure would be necessary to eliminate potential risks and to “right size” systems to better serve the reduced campus footprint.

Figure 4 - Buildings Proposed for Demolition

1. Mini Warehouse Building (Bldg #120)
2. Barracks D Building (Bldg #104)
3. Barracks G Building (Thrift Shop) (Bldg #105)
4. Trailer 1 (east)/3 (west) (Bldg #111)
5. Trailer 126 (Bldg #112)
6. Trash Compactor (Bldg #506)
7. Annex I, II, III (Bldg #522, 523, 524)
8. Trailer 8 (Bldg #408)
9. Trailer 15 (Bldg #407)
10. Parking Lot 10 (Bldg #410)
11. Shed 2 (Pharmacy Trailer) (Bldg #538)
12. Shed 1 (Pharmacy Trailer) (Bldg #503)
13a. Main West Central Power Plant (Bldg #516)
13b. Large Cooling Tower
13c. West Central Power Plant Outbuilding
14. General Laboratory Building (Bldg #302)
15. Trailer 17 (Bldg #309)
16. Mason Shop (Bldg #529)
17. Tram Shop (Bldg #528)
18. Tram Shop Storage and Presser Washer Building (Bldg #536)

Project Boundary

0 300
Scale (Feet)

Source: Nearmap 2025.

The Proposed Stabilization Project proposes not only identifying which portions of the utility network should be preserved, upgraded, or decommissioned—but implementation proposes executing on the rerouting and replacement of these systems where necessary. Aging and fragmented utility lines currently traverse buildings slated for removal, and in some instances, intersect with known hazardous material zones or steep grade transitions. The rerouting and replacement would include reconnection of critical water, power, sanitary, and stormwater systems to reflect the revised site configuration and the needs of the remaining active buildings. These system would be redesigned for continued flexibility for the construction of new accessible utility corridors that meet current codes and capacity demands.

Soil Remediation

The Proposed Stabilization Project includes early and comprehensive site investigations to address subsurface risks. In planning and design, geotechnical testing would be expanded beyond the previously studied zones to provide a consistent campus-wide understanding of soil behavior, liquefaction risks, corrosivity, and foundation design implications. Concurrently, early testing for hazardous materials, including asbestos, lead, and hydrocarbons, would be conducted, especially in areas identified as contaminated or containing legacy medical and industrial waste. Previously identified risks within the Project Site, such as a buried oil well on the superblock's southern edge and methane mitigation requirements across the Project Site, require confirmation and detailed remediation plans.

In addition to identifying hazardous materials and contaminated soil, the Proposed Stabilization Project would proceed with implementation of the environmental remediation efforts necessary, carrying out the soil removal, encapsulation, regrading, and compacting or other mitigation strategies as necessary to protect public health and comply with regulatory requirements.

Construction of Circulatory Pathways

The Proposed Stabilization Project includes the planning, design, and construction of new ADA-compliant circulation pathways throughout the Project Site following demolition, regrading, and utility work. Once the Project Site is cleared and stabilized, the Proposed Stabilization Project would create a new, interconnected circulation network that would improve access to key facilities, particularly between parking areas and operational medical buildings. These improvements would greatly enhance safety, equity, and navigability across not only the Project Site but the overall LAC+USC Medical Center Campus, as well as site hydrology, and balancing cut and fill. Together, remediation, utility realignment, and new circulation infrastructure represent foundational steps in stabilizing and modernizing the campus.

WEST CENTRAL PLANT DECOMMISSIONING AND DEMOLITION

The Approved Project included the demolition and relocation of the WCP as the 2014 Master Plan EIR indicated that the WCP does not have sufficient capacity to serve the LAC+USC Medical Center Campus.

Construction of New Localized Heating and Cooling Systems

With General Hospital's planned disconnection from the West Central Plant (WCP) services once the maintenance and seismic retrofit scopes commence, the only remaining buildings on campus served by the plant will be the OPD/IRD and the Medical Examiner. Given WCP's high maintenance costs, multiple performance and safety issues, and aging, increasingly unreliable systems, continued operation of the plant to service a lower load demand is not feasible. Additionally, given the deteriorated pipes and leaky steam tunnels, the most efficient and reliable solution is for a set of new standalone heating and cooling systems to be constructed in proximity to the buildings being serviced. The Proposed Stabilization Project includes planning and design to identify suitable locations for the new systems. This design would include the heating and cooling system, power requirements, controls, monitoring, structural platform and protective fencing for a complete, protected system that incorporates sustainability targets. In implementation, these units would be constructed to ensure that essential services remain uninterrupted.

The LAC+USC Medical Center Campus 1600-ton chillers located on the General Hospital terrace, which supplement cooling for the new clinic tower, currently receive soft water from the WCP but are otherwise independent of it. The Proposed Stabilization Project includes planning, designing, and implementing the transition of this water supply to an alternative water system.

Decommissioning and Demolition of West Central Plant

Constructing new localized heating and cooling systems and transitioning the water supply would enable the full decommissioning of the WCP. Replacement systems would be constructed and brought online prior to the WCP's decommissioning and demolition. Concurrent with the new localized systems construction, the Proposed Stabilization Project includes the design of WCP's demolition plans. Once the new systems are operational and the demolition plans finalized, the Proposed Stabilization Project would proceed with WCP's demolition and site clearance.

VIP CMHC Relocation

Under the Proposed Stabilization Project, VIP CMHC would vacate a portion of their West Campus operations and services. The staff, operations, and services vacated from a portion of the West Campus would be relocated to Building A/B C/D within the Central Juvenile Hall

campus pursuant to a Gratis Lease with VIP CMHC. The relocated operations and services would be compatible with the existing uses within the Central Juvenile Hall campus, which provides mental healthcare services to youths.

Minor interior renovations and ongoing maintenance such as repairs and upgrades to interior furniture, fixtures, and equipment would be undertaken at Building A/B C/D to prepare the facility to provide the existing outpatient clinical services and case management services.

Construction Assumptions

The Proposed Stabilization Project's construction activities would occur within the permitted hours as identified in the County's Municipal Code, which identifies 7 a.m. to 7 p.m. on Monday through Friday or 8 a.m. to 6 p.m. on Saturdays. Staging areas for construction would be consistent with those identified in the 2014 Master Plan EIR. As noted in the 2014 Master Plan, staging areas 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. Additionally, as with the Approved Project, the Proposed Stabilization Project's construction haul trips would be consistent with a haul route permit to be approved by the Los Angeles County Department of Public Works and avoid noise-sensitive areas.

The 2014 Master Plan EIR identified that excavation and substantial grading would occur throughout the LAC+USC Medical Center Campus. The Proposed Stabilization Project's construction activities would occur within the boundaries identified for impact under the Approved Project.

The 2014 Master Plan EIR identified a 25-year timeframe for the Approved Project and that implementation of each Approved Project component would occur as funding, among other factors, became available. However, the 2014 Master Plan EIR analyzed a worst-case scenario, which envisioned all Approved Project elements being constructed at once and overlapping. This assumption continues to capture the maximum daily activities that would occur under the Proposed Stabilization Project.

Operational Conditions

The Proposed Stabilization Project does not include any new development on- or off-site or land use changes within the boundaries of the Project Site as identified in the 2014 Master Plan EIR. Operational conditions of the Approved Project analyzed in the 2014 Master Plan EIR and as refined by the subsequent Addenda would continue as anticipated, and would include as-needed regular ongoing maintenance activities.

The proposed relocation of operations of the VIP CMCH would not affect the staffing or hours of operation related to the continuation of this program at a different proximate location within the West Campus. The VIP CMHC use would be consistent with the uses operating at the Central Juvenile Hall campus. The VIP CMHC would continue to operate as a nonprofit that provides mental health, crisis intervention, and medication support services to children and their families. Operations at the Central Juvenile Hall would continue as anticipated.

3.2.3 Proposed Stabilization Project Consistency with the 2014 Approved Project Objectives

Table 4, *Proposed Stabilization Project Consistency with Approved Project Objectives*, shows that the Proposed Stabilization Project would not conflict with any of the Approved Project's objectives but would facilitate the objectives.

Table 4 Proposed Stabilization Project Consistency with Approved Project Objectives

2014 Master Plan Project Objectives	Proposed Stabilization Project Consistency Analysis
Achieve a community-friendly campus	The Proposed Stabilization Project's improvements would facilitate the development a community-friendly campus by improving circulation and accessibility; improving infrastructure; and reducing the risk of exposure of hazards/hazardous materials through testing and remediation within the LAC+USC Medical Center Campus. The Proposed Stabilization Project would not change land uses within the LAC+USC Medical Center Campus and would not alter the operational conditions under Approved Project buildout.
Promote healthy lifestyles and wellness	The Proposed Stabilization Project's improvements would promote healthy lifestyles and wellness by improving circulation and accessibility and reducing the risk of exposure to hazards/ hazardous materials through testing and remediation.
Maximize access to the medical center by the community	The Proposed Stabilization Project's circulation and accessibility improvements would help to maximize access to the medical center.
Provide opportunities for appropriate education and job training	The Proposed Stabilization Project would not change land uses within the LAC+USC Medical

Table 4 Proposed Stabilization Project Consistency with Approved Project Objectives	
	Center Campus or alter the operational conditions under Approved Project buildout. The Proposed Stabilization Project would not interfere with the County's ability to provide opportunities for appropriate education and job training.
Incorporate on-campus business opportunities	The Proposed Stabilization Project would not change land uses within the LAC+USC Medical Center Campus or alter the operational conditions under Approved Project buildout. The Proposed Stabilization Project would not interfere with the County's ability to incorporate on-campus business opportunities.
Plan for future program development	The Proposed Stabilization Project's improvements would improve circulation and accessibility; improve infrastructure; and reduce the risk of exposure to hazards/hazardous materials through testing and remediation within the LAC+USC Medical Center Campus. The Proposed Stabilization Project would allow for better facilitation of future program development.

4. ENVIRONMENTAL ANALYSIS

This section provides evidence to substantiate the conclusions in the environmental checklist included in Appendix G of the State CEQA Guidelines. The section summarizes the conclusions of the 2014 Master Plan EIR, discusses the impacts due to the Proposed Stabilization Project as compared to the Approved Project, then discusses the conditions described in CEQA Guidelines Section 15162. This Addendum documents that the Proposed Stabilization Project would not result in any new significant environmental impacts, an increase in the severity of significant impacts previously identified and studied in the 2014 Master Plan EIR, or any new or considerably different mitigation measures or alternatives that the County declines to adopt. Accordingly, this Addendum is the appropriate form of environmental review for the Proposed Stabilization Project. This Addendum has been prepared to satisfy the requirements of State CEQA Guidelines Section 15164.

The following environmental analysis addresses impacts resulting from implementation of the Proposed Stabilization Project, which consists mainly of construction-type activities, such as the use of construction equipment for demolition and seismic retrofitting and remediation efforts. The Proposed Stabilization Project does not include any development of new uses on or off-site and does not include a land use change that would impact the continued operation of uses at the LAC+USC Medical Center Campus. The uses at the LAC+USC Medical Center Campus would operate as anticipated under the Approved Project. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC due to relocation; the VIP CMHC would continue to operate as anticipated. Minor interior improvements and renovation to Building A/B C/D associated with this relocation are limited in nature and would not result in impacts to the environment.

Not all previously adopted mitigation measures in the approved MMRP are applicable to the Proposed Stabilization Project. Previously adopted mitigation measures the are applicable to the Proposed Stabilization Project are referenced as appropriate. The previously adopted mitigation measures from the 2014 Master Plan EIR continue to be valid, feasible, and applicable to the Approved Project as refined by the subsequent Addenda. The mitigation measures that are applicable to the scope of activities included in the Proposed Stabilization Project are identified throughout this Addendum. Appendix C to this Addendum provides the previously adopted MMRP in its entirety for reference.

4.1 AESTHETICS

4.1.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The 2014 Master Plan EIR identified no designated scenic highways, corridors, or parkways within the Approved Project viewshed, and no recognized scenic vistas were identified within the community; only informal views were identified where one could see views of the Old General Hospital Building, the Downtown skyline, and local foothill and mountain ridgelines. 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 (Mitigation Measure MM-AES-1). The Approved Project would not result in a significant adverse effect on a scenic vista.

The Approved Project is not in 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 Approved Project. However, the Women's and Children's Hospital, which is a historic resource and aesthetically noteworthy because of its architectural design, would be demolished to accommodate future Approved Project development. Previously adopted Mitigation Measure MM-CR-3 would partially mitigate Approved Project impacts to scenic resources, but demolition of the Women's and Children's Hospital building would remain a significant and unavoidable visual impact of the Approved Project.

The visual setting of the LAC+USC Medical Center Campus is characterized by low to high visual quality, providing an often flexible urban design context for new development features. Temporary construction activities would not result in significant changes to visual character, nor would these result in a significant overall reduction in visual quality. New buildings would be generally compatible in architectural form, finishes, and scale with existing campus buildings, and the Approved Project would preserve most of the significant architectural/historical resources within the LAC+USC Medical Center Campus while adding extensive new landscape elements to create an inviting parklike setting for campus staff and visitors. Impacts would be less than significant. Nonetheless, previously adopted Mitigation Measure MM-AES-1 would protect elements of moderately high visual quality in the community, such as vantages within the LAC+USC Medical Center Campus that offer views of downtown Los Angeles and the San Gabriel Mountains, as appropriate.

Both the LAC+USC Medical Center Campus and the surrounding area are in a fully urbanized setting in which there are numerous existing sources of light and glare. These include existing LAC+USC Medical Center Campus health services buildings and commercial buildings along adjoining streets. The net contribution of Approved 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 Approved Project would introduce new buildings and parking areas and new shielded outdoor lighting features that would not significantly alter ambient light levels or result in significant spill light impacts on surrounding land uses. All Approved 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, Approved Project elements would be designed to be compatible with the design character of the setting in which they are being proposed and would not use highly reflective finishes or colors. Therefore, the Approved Project would not produce significant light or glare impacts.

4.1.2 Impacts Associated with the Proposed Stabilization Project

Except as provided in Public Resources Code Section 21099, would the project:

Would the project:	**Level of Impact in Certified EIR**	**Conditions Requiring Subsequent Review**			**Stabilization Project Meets the Conditions for an Addendum** *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Have a substantial adverse effect on a scenic vista?	LTS	No	No	No	**Yes**
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	SU	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
c) In nonurbanized areas, substantially degrade 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). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LTS	No	No	No	**Yes**
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LTS	No	No	No	**Yes**

a) Have a substantial adverse effect on a scenic vista?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR determined that there are no recognized scenic vistas in the community. The 2014 Master Plan EIR identified that informal views of the General Hospital, downtown skyline, and local foothills and mountain ridgelines are available from the surrounding public viewsheds.

The Proposed Stabilization Project is within the boundaries of the LAC+USC Medical Center Campus; no off-site improvements are proposed as part of the Proposed Stabilization Project. The Proposed Stabilization Project includes four components—a seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommissioning and demolition of the West Central Plant—that are within the impact boundaries analyzed in the 2014 Master Plan EIR for the Approved Project. Section 3.3, *Description of the Proposed Stabilization Project*, provides specific details of the proposed seismic retrofit improvements and West Campus site improvements.

The proposed seismic retrofit and maintenance of the General Hospital Building would comply with the Secretary of Interior (SOI) Standards to preserve the historic features of the General Hospital. The seismic retrofit improvements proposed for the General Hospital Building includes selective demolition to remove non-essential and non-historic elements within the interior of the building (as defined in the LAC+USC Medical Center General Hospital Reuse and Protective Storage Plan). Construction activities associated with implementing the seismic retrofit would be temporary in nature, would not alter the physical appearance of the General Hospital, and would not result in new construction equipment, intensity, or methods; impacts would not exceed those described in the 2014 Master Plan EIR. Impacts related to scenic vistas would continue to be less than significant.

The improvements within the West Campus were assumed under the Approved Project and analyzed in the 2014 Master Plan EIR. Specifically, the 2014 Master Plan EIR assumed that the construction activities associated with the Approved Project would occur over 25 years (from 2015 to 2040). General construction activities analyzed included the demolition of several structures, including the old utility (WCP) and maintenance facility, OPD building, interns and residents building, Parking Structures 10 and 12, Women's and Children's Hospital, several modular buildings, and storage and warehouse buildings. Additionally, excavation and grading activities were assumed to implement the Approved Project. As with the Approved Project, the Proposed Stabilization Project would stage construction equipment within the boundaries of the campus; the staging locations would be determined by the construction contractor(s) in consultation with the County. The contractor(s) and the County would consider whether there is a sufficient buffer between the staging area and potential off-site sensitive land uses to ensure impacts from construction staging would be minimized. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) not analyzed in the 2014 Master Plan EIR, the demolition of these buildings would not result in new construction equipment, intensity, or methods would result in impacts that exceed those described in the 2014 Master Plan EIR. The Proposed Stabilization Project's improvements within the West Campus would be within the impact boundaries identified for the Approved Project analyzed in the 2014 Master Plan EIR. Impacts related to scenic vistas would continue to be less than significant.

The Proposed Stabilization Project does not include any new development on or off-site and does not include a land use change. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts to scenic vistas would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. Since the certification of the 2014 Master Plan EIR, the California Department of Transportation identified a portion of the 110 Freeway (Arroyo Seco Historic Parkway Scenic Byway), between US-101 Freeway and E Colorado Boulevard in the City of Pasadena, as an official Federal Byway (Caltrans 2025). The 110 Freeway is 1.46 miles northwest of the LAC+USC Medical Center Campus. Due to distance, topography, and intervening development, the Project Site is not visible from the 110 freeway.

As with the Approved Project, the Proposed Stabilization Project would not introduce new development near a scenic highway. No rock outcroppings exist within or around the Project Site. Additionally, as with the Approved Project, the Proposed Stabilization Project would preserve mature trees and the architectural/historical resources within the Project Site. Like the Approved Project, though specific trees that may be removed as part of the West Campus component of the Proposed Stabilization Project have not been determined, the trees are not identified as scenic resources.

The 2014 Master Plan EIR identified several scenic resources within the boundaries of the LAC+USC Medical Center Campus, including the General Hospital and Administration Building, the Women's and Children's Hospital, and mature landscaping and hardscape features (installed in 1933). The Women's and Children's Hospital was demolished in 2021, which was identified as a significant and unavoidable impact. The Proposed Stabilization Project would not result in the demolition of other historic buildings within the Project Site.

The buildings proposed for demolition, apart from the General Laboratory and Mason Shop, were assumed to be demolished as part of the Approved Project, and the construction activities associated with implementation of the Approved Project were analyzed in the 2014 Master Plan EIR. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in

the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Moreover, the proposed seismic retrofit of the General Hospital would facilitate the County's intent to preserve a historic structure within not only the Project Site but the entirety of the LAC+USC Medical Center Campus. The proposed seismic retrofit of the General Hospital would preserve the character-defining features of the building while strengthening and maintaining its structural integrity. Impacts to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway, would be less than significant. Although the Proposed Stabilization Project would result in less than significant impacts, the Proposed Stabilization Project would not reduce the Approved Project's significant and unavoidable impacts. Impacts would remain significant and unavoidable.

The Proposed Stabilization Project does not include any new development on or off-site and does not include a land use change. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No impacts to scenic resources would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

c) In nonurbanized areas, substantially degrade 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). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As with the Approved Project, the Proposed Stabilization Project is within an urbanized area. Specifically, the stabilization components of the Proposed Stabilization project are within the LAC+USC Medical Center Campus, which is a fully developed medical center. As described in the 2014 Master Plan EIR, the visual setting of the LAC+USC Medical Center Campus and surrounding area is characterized by low to high visual quality.

No land use or zoning changes are proposed to implement the Proposed Stabilization Project; the Proposed Stabilization Project would be consistent with applicable zoning and other regulations governing scenic quality. As with the Approved Project, construction of the Proposed Stabilization Project would occur in a fully urbanized setting that has seen extensive development over long periods of time. The temporary presence of construction-related

vehicles and equipment and construction activities would not result in significant changes to the visual character or quality of the public views of the site and its surroundings. The proposed seismic retrofit of the General Hospital would retain the character-defining features of the building, and the visual qualities that demonstrate its significance would be retained and protected. Public views of the General Hospital would continue to be available from publicly accessible vantage points. The Proposed Stabilization Project would not introduce new development or land uses to the Project Site or LAC+USC Medical Center Campus that have the potential to degrade the existing visual character or quality of the public views of the Project Site and its surrounding area. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts related to visual character would continue to be less than significant.

The Proposed Stabilization Project does not include any new development on or off-site and does not include a land use change. The Proposed Stabilization Project would not conflict with applicable zoning and other regulations governing scenic quality. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts to scenic quality would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As with the Approved Project, the Proposed Stabilization Project's construction activities are anticipated to occur during allowable construction hours of 7 a.m. to 7 p.m. on Monday through Friday or 8 a.m. to 6 p.m. on Saturdays, consistent with County and the 2014 Master Plan EIR; therefore, the Proposed Stabilization Project's construction activities are unlikely to substantially alter ambient illumination light levels or result in significant light spill on surrounding land uses off-site or off the LAC+USC Medical Center Campus. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or

methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Therefore, as with the Approved Project, no impacts would occur.

The Project Site is within a fully urbanized area that has numerous existing sources of light and glare. Additionally, the Proposed Stabilization Project does not include the development of new buildings or propose new land uses; the Proposed Stabilization Project would not create new sources of light or glare. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts related to light or glare would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.1.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measure MM-AES-1 from the 2014 Master Plan EIR is not applicable to the Proposed Stabilization Project because the Proposed Stabilization Project does not include new development. Mitigation Measure MM-CR-3 is not applicable to the Proposed Stabilization Project because demolition of the Women's and Children's Hospital has already occurred.

4.2 AGRICULTURE AND FORESTRY RESOURCES

4.2.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The 2014 Master Plan EIR determined that no impacts to agricultural resources would occur. The LAC+USC Medical Center Campus is located in a developed portion of the City of Los Angeles. The LAC+USC Medical Center Campus is not on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the Approved Project would not convert such farmland to nonagricultural use.

The LAC+USC Medical Center Campus is not under Williamson Act contract (California Department of Conservation 2008), nor is it zoned or designated for agricultural use. It is in a developed area with no nearby agricultural land. The Approved Project would therefore have no potential to convert farmland, conflict with agricultural zoning, or lead to other changes in the existing environment that could lead to farmland conversion.

The LAC+USC Medical Center Campus is not zoned as forestland, timberland, or Timberland Production. The LAC+USC Medical Center Campus is currently developed and does not contain forestland or timberland. Therefore, the Approved Project would not conflict with existing zoning or cause rezoning of forest or timberland. The LAC+USC Medical Center Campus is not located on or near forestland. Therefore, the Approved Project would not result in the loss or conversion of forestland.

The Approved Project would not convert farmland or forestland. Since the Approved Project would not have a secondary impact with regard to farmland or forestland conversion, the Approved Project would also not contribute to a cumulative farmland or forestland conversion impact. No further analysis was warranted in the 2014 Master Plan EIR.

4.2.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	**Level of Impact in Certified EIR**	**Conditions Requiring Subsequent Review**			**Stabilization Project Meets the Conditions for an Addendum** *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
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?	LTS	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	LTS	No	No	No	**Yes**
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))?	LTS	No	No	No	**Yes**
d) Result in the loss of forest land or conversion of forest land to non-forest use?	LTS	No	No	No	**Yes**
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?	LTS	No	No	No	**Yes**

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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR identified that the LAC+USC Medical Center Campus is not on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and the Project Site is on the LAC+USC Medical Center Campus. According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the Project Site is in Urban and Built-Up Land and is not near or within any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2025a). The Project Site is not used for agricultural purposes. Thus, implementation of the Proposed Stabilization Project would not convert agricultural land to a non-agricultural use. Like the 2014 Master Plan EIR, no impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

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

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR did not identify any potential impacts to land zoned for agricultural use or under a Williamson Act contract. Land uses within or near the Project Site are not zoned for agricultural uses and are not subject to a Williamson Act contract. Thus, implementation of the Proposed Stabilization Project would not conflict with agricultural zones or a Williamson Act contract. Like the 2014 Master Plan EIR, no impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

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))?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR determined that no impact would occur since no forest land or timberland production exist on-site or in the vicinity of the LAC+USC Medical Center Campus. The Project Site is currently developed within structures supporting the LAC+USC Medical Center Campus and is in an urbanized area. According to the California Department of Fish and

Wildlife (CDFW), the Project Site does not contain forest lands or timberlands, and no such uses exist near or within the Project Site (CDFW 2015). Thus, implementation of the Proposed Stabilization Project would not conflict with such zoning. Like the 2014 Master Plan EIR, no impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

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

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR determined that no impact would occur from loss of forest land. The Project Site does not contain any forest lands or timberlands, and no such uses exist near or within the Project Site. Thus, implementation of the Proposed Stabilization Project would not conflict with such zoning. Like the 2014 Master Plan EIR, no impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR determined that no impact would occur related to the conversion of Farmland or forest land to non-agricultural or non-forest use. No agricultural uses (including farmland and forestland) exist on-site nor within the vicinity of the Project Site. Development of the Proposed Stabilization Project would not result in the conversion of farmland to a non-agricultural use and would not result in the conversion of forest land to a non-forest use. Like the 2014 Master Plan EIR, no impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.2.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

No mitigation measures related to agricultural resources were outlined in the 2014 Master Plan EIR, and no new mitigation measures would be required for the Proposed Stabilization Project.

4.3 AIR QUALITY

4.3.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The 2014 Master Plan EIR determined that the Approved Project would be consistent with the City of Los Angeles' general plan and the goals of Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy and the Regional Comprehensive Plan (see Section 3.9, Land Use/Planning, of the 2014 Master Plan EIR for more discussion). The Approved Project is considered consistent with the governing land use document, which is the City of Los Angeles General Plan. Furthermore, pursuant to South Coast Air Quality Management District (SCAQMD) guidelines, the Approved Project is considered consistent with the region's Air Quality Management Plan (AQMP). Therefore, emissions related to the Approved Project are accounted for in the AQMP, which has been crafted to bring the air basin into attainment status for all nonattainment pollutants and precursors. Accordingly, the Approved Project would not conflict with or obstruct implementation of the applicable AQMP. This impact was considered less than significant.

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

As discussed above, criteria pollutant emissions were not expected to exceed SCAQMD regional thresholds during construction and operation of Approved Project development after mitigation

for existing and future no-project conditions. Therefore, because the Approved Project would not exceed the thresholds for a nonattainment pollutant (in this case, an ozone precursor [VOC and NOx], PM_{10}, $PM_{2.5}$, or Pb), the Approved Project would not result in a net increase in pollutants (including ozone precursors) that would be cumulatively considerable. With implementation of Mitigation Measures MM-AQ-1 through MM-AQ-3, impacts would be less than significant.

Construction of the Approved Project 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. Localized emissions during construction were expected to exceed the local significance thresholds (LST) for NOx, PM_{10}, and $PM_{2.5}$ before mitigation. Based on localized analysis that conservatively assumes maximum daily construction activities are concentrated in a one-acre area near offsite receptor locations, localized emissions during construction are expected to exceed the appropriate LSTs for NOx, PM_{10}, and $PM_{2.5}$ before mitigation. Mitigation Measures MM-AQ-1 through MM-AQ-3 were determined sufficient to mitigate localized construction impacts; however, potential emissions of $PM_{2.5}$ and PM_{10} during construction would remain significant after mitigation. During operation, localized emissions during operations would not exceed LSTs for the project area in both existing and future no-project conditions. Operation-related impacts would be less than significant.

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

With respect to carbon monoxide (CO) hot spots at nearby intersections, implementation of the Approved Project would create congested conditions at various intersections near the LAC+USC Medical Center Campus, 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 in the project vicinity. Consequently, the project would not cause or contribute to new air quality violations, worsen existing violations, or delay timely attainment of CO National Ambient Air Quality Standards. The impact of traffic from the project on ambient CO levels is considered less than significant. No mitigation is required.

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

4.3.2 Impacts Associated with the Proposed Stabilization Project

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Conflict with or obstruct implementation of the applicable air quality plan?	LTS	No	No	No	**Yes**
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	LTS/M	No	No	No	**Yes**
c) Expose sensitive receptors to substantial pollutant concentrations?	SU	No	No	No	**Yes**
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	No	No	No	**Yes**

a) Conflict with or obstruct implementation of the applicable air quality plan?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Proposed Stabilization Project includes seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommission and demolition of the WCP, which, are within the impact boundaries identified for the Approved Project. As previously discussed, the activities associated with the proposed seismic retrofit and demolition of two additional buildings (General Laboratory and Mason Shop), were not analyzed in the 2014 Master Plan EIR. The 2014 Master Plan EIR determined that the Approved Project, which would be constructed from 2015 to 2040, is consistent with the City's General Plan and Southern California Association of Governments' Regional Transportation Plan/ Sustainable Communities Strategy and Regional Comprehensive Plan. None of the Approved Project's development elements analyzed in the 2014 Master Plan EIR have been implemented. Therefore, the majority of construction emissions evaluated in the 2014 Master Plan EIR have not been implemented or realized to date.

It should be noted that the components analyzed in the certified 2017 and 2023 Addenda are currently under construction. Because the construction activities proposed by the Proposed Stabilization Project for the stabilization components would use standard construction equipment, would engage in standard construction activities, are within the boundaries of the impact boundaries of the Approved Project, and would occur within the Approved Project's lifespan, the Proposed Stabilization Project's emissions were accounted for in the SCAQMD Air Quality Management Plan. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. As with the Approved Project, the Proposed Stabilization Project would result in less than significant impacts to air quality plans. Impacts related to conflicts with an air quality plan would continue to be less than significant.

The Proposed Stabilization Project would not introduce new development or a change in operational land uses at the Project Site. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts related to conflicts with an air quality plan would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As with the Approved Project, the Proposed Stabilization Project's construction activities have the potential to create air quality impacts through the use of heavy-duty construction equipment, construction workers' vehicle trips, material deliveries, and trips by heavy-duty haul trucks. Additionally, earthwork activities would result in fugitive dust emissions, and paving operations would release volatile organic compounds (VOCs) from off-gassing. Construction emissions would vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. The Proposed Stabilization Project's construction activities would use standard construction equipment, would engage in standard construction activities, are within the boundaries of the impact boundaries of the Approved Project, and would occur within the 25-year life cycle of the Approved Project (through 2040). The 2014 Master Plan EIR provided a worst-case scenario and assumed all phases of construction would be concurrent. Therefore, the Proposed Stabilization Project's emissions related to construction were accounted for in the 2014 Master Plan EIR.

Although the Proposed Stabilization Project would result in the demolition of two buildings (General Laboratory and Mason Shop) that were not that were not specifically addressed in the 2014 Master Plan EIR, the demolition of these structures would include the use of standard construction equipment and engage in standard demolition practices. Moreover, the proposed construction activities associated with the seismic retrofit of the General Hospital would include standard construction equipment and standard construction methods. The proposed seismic retrofit component is not anticipated to introduce new equipment, intensity, or construction methods that would exceed previously disclosed impact levels. Additionally, as previously discussed, the majority of construction emissions evaluated in the 2014 Master Plan EIR have not been implemented or realized to date; therefore, emissions generated by the Proposed Stabilization Project would fall within the emissions envelope assumed in the 2014 Master Plan EIR. Any future development pursuant to the 2014 Master Plan would undergo separate CEQA review to determine consistency with prior assumptions. As with the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measures MM-AQ-1 through MM-AQ-3 to reduce emissions. With the incorporation of mitigation, impacts would be reduced to a less than significant level. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the

VIP CMHC would continue as anticipated. Operational impacts related to an increase in criteria pollutants would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

c) Expose sensitive receptors to substantial pollutant concentrations?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR conservatively assumed that maximum daily construction activities were concentrated in a one-acre area near off-site receptor locations. The Proposed Stabilization Project is a construction effort, the activities of which are within the impact boundaries identified for the Approved Project in the 2014 Master Plan EIR; the Proposed Stabilization Project does not include any off-site improvements that have the potential to be located closer to the sensitive receptors identified in the 2014 Master Plan EIR. As identified in the 2014 Master Plan EIR, localized emissions during construction are expected to exceed the applicable LSTs for NOx, PM_{10}, and $PM_{2.5}$ before mitigation. Additionally, as assumed in the 2014 Master Plan EIR, the Proposed Stabilization Project's construction activities would occur while the Project Site (hospital uses) is in use. As with the Approved Project, the Proposed Stabilization Project's construction activities would emit localized pollutants through the on-site use of heavy-duty construction equipment as well as fugitive dust from ground-disturbing activities. These localized emissions could expose nearby sensitive receptors to substantial pollutant concentrations.

While the Proposed Stabilization Project includes the demolition of two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities that were not specifically addressed in the 2014 Master Plan EIR, the Proposed Stabilization Project's construction activities are not anticipated to include new equipment, intensity, or construction methods that would exceed impacts disclosed in the 2014 Master Plan EIR. As with the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measures MM-AQ-1 and MM-AQ-3 to reduce emissions for VOC, NO_x, CO, SO_x, $PM_{10,}$ and $PM_{2.5}$ and comply with Rule 403 to reduce PM emissions. As with the Approved Project, even with the implementation of mitigation measures and compliance with regulatory requirements, construction emissions would still exceed $PM_{2.5}$ and PM_{10} emission thresholds. Therefore, like the Approved Projects, impacts related to pollutant concentrations would remain significant and unavoidable.

As with the Approved Project, with respect to TACs, the closest sensitive land uses are residential areas surrounding the LAC+USC Medical Center Campus. Construction of the

Proposed Stabilization Project would be sporadic in both duration and location and would be within the 25-year approved project time frame (through 2040), which is shorter than the 70-year exposure period used to estimate lifetime cancer risks. Therefore, construction of the Proposed Stabilization Project alone is not anticipated to result in an elevated health risk to exposed persons because of the short term nature of construction-related diesel exposure.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Project. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts related to exposure of sensitive populations to pollutants would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. Land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting areas, refineries, landfills, dairies, and fiberglass molding facilities. The Proposed Stabilization Project does not include any uses associated with odors and would not produce objectionable odors.

The Proposed Stabilization Project includes seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommission and demolition of the WCP, which are within the impact boundaries identified for the Approved Project. As previously discussed, the activities associated with the proposed seismic retrofit and demolition of two additional buildings (General Laboratory and Mason Shop), were not analyzed in the 2014 Master Plan EIR.

As with the Approved Project, the Proposed Stabilization Project's construction activities would not affect a substantial number of people because construction activities generally do not emit offensive odors. Potential odor emitters during construction activities include asphalt paving. SCAQMD Rule 1108 limits the amount of VOC emissions from cutback asphalt, and Rule 1113 limits VOC content of architectural coatings. Given mandatory compliance with SCAQMD rules, no construction activities or materials are proposed that would create a significant level of objectionable odors. Although the Proposed Stabilization Project would result in the demolition

in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts during short-term construction for the would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts related to odors would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.3.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measures MM-AQ-1, MM-AQ-2, and MM-AQ-3 from the 2014 Master Plan EIR are applicable to the Proposed Stabilization Project and have been incorporated into the Proposed Stabilization Project's MMRP.

> **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 offroad 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 on 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.

4.4 BIOLOGICAL RESOURCES

4.4.1 Summary of Impacts Identified in the 2014 Master Plan EIR

As identified in the 2014 Master Plan EIR, the LAC+USC Medical Center Campus is located in an entirely urbanized area with limited to no biological resources. There are no candidate, sensitive, or special-status animal or plant species on-site, with the exception of the two California black walnut trees that were identified on the LAC+USC Medical Center Campus or in its surroundings. If the two California black walnut trees remain on the site, it is not anticipated that operational activities would have an adverse impact on these trees. Operational activities on the campus, which would not differ significantly from current activities, are also not expected to result in significant impacts on bat species that may roost on the LAC+USC Medical Center Campus. Therefore, construction and operation of the facilities and buildings proposed under the Approved Project would not have an adverse impact on any candidate, sensitive, or special-status animal or plant species. Impacts associated with buildout of the Approved Project would be considered less than significant.

The 2014 Master Plan EIR determined that there is some limited potential for several bat species, all considered California Species of Concern, to occur in the LAC+USC Medical Center 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 LAC+USC Medical

Center Campus. If individual development projects under the Approved Project would require removal of palm trees or other potential roost sites, a potentially significant impact to CDFW species of concern could occur. Implementation of Mitigation Measure MM-BIO-1 ensures that the potential impacts of construction activities on roosting bats would be reduced to less than significant.

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

The LAC+USC Medical Center Campus is 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 Approved Project would not affect wildlife corridors.

The Approved Project includes no new development and would not pose substantial barriers or other impediments to wildlife movement. Impacts would be less than significant. Bird species that are protected under the MBTA have the potential to nest in the existing ornamental vegetation on the LAC+USC Medical Center 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 Mitigation Measures MM-BIO-1 and MM-BIO-2 ensure that the potential impacts of construction activities on nesting birds that are protected under the MBTA and California Fish and Game Code would be reduced to less than significant.

Construction of Approved Project facilities and structures could result in damage to or removal of vegetation on the LAC+USC Medical Center Campus, 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 Mitigation Measure MM-BIO-3 ensures 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 Approved Project, including routine maintenance and pruning of ornamental vegetation and trees, is not expected to result in significant impacts.

4.4.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	**Level of Impact in Certified EIR**	**Conditions Requiring Subsequent Review**			**Stabilization Project Meets the Conditions for an Addendum** *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
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?	LTS/M	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
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?	LTS	No	No	No	**Yes**
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LTS	No	No	No	**Yes**
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?	LTS/M	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS/M	No	No	No	**Yes**
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	LTS	No	No	No	**Yes**

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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As discussed in the 2014 Master Plan EIR, the Project Site and surrounding area consist of developed land and ornamental landscaping; no sensitive animal species have been documented within the LAC+USC Medical Center Campus and none have the potential to occur. According to the California Department of Fish and Wildlife (CDFW) Biogeographic Information and Observation System (BIOS) Map, the LAC+USC Medical Center Campus, including the Project Site is classified as “Developed, High Intensity” and “Developed, Medium Intensity” land cover (CDFW 2021).

Additionally, as discussed in the 2014 Master Plan EIR, the Project Site does not support suitable habitat for federal- or state-listed threatened or endangered plant species. Therefore, as with the Approved Project, the Proposed Stabilization Project would not affect any federal- or-state-listed plant species. The 2014 Master Plan EIR identified two California black walnut trees within the central portion of the LAC+USC Medical Center Campus and stated that these two trees do not represent a regionally significant population (see Figure 3.3-1 of the 2014 Master Plan EIR). These trees would not be affected by the Proposed Stabilization Project and would remain. Impacts related to protected species during construction would continue to be less than significant.

The 2014 Master Plan EIR determined that there is limited potential for several bat species, all considered California Species of Concern, to occur within the LAC+USC Medical Center Campus, including the Project Site, due to limited foraging and roost potential within trees and vacated structures. There is low potential for roosting of Western yellow bats. The Proposed Stabilization Project does not propose any improvements off-site; the Proposed Stabilization Project would be fully within the geographic area of impact identified for the Approved Project analyzed in the 2014 Master Plan EIR. As with the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measure MM-BIO-1 to reduce impacts to roosting bats during construction. Additionally, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measure MM-BIO-2 to reduce impacts on nesting migratory birds. Impacts related to protected species during construction would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No operational impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines**.**

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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As previously identified, the Project Site is in an urbanized and fully developed area. According to the National Wetlands Inventory, there is no riparian habitat or other sensitive natural

community within the boundaries of the LAC+USC Medical Center Campus, including the Project Site (USGS 2025). The Proposed Stabilization Project would occur within the area of impact analyzed in the 2014 Master Plan EIR, which is void of riparian or sensitive natural communities. Therefore, as with the Approved Project, the Proposed Stabilization Project would continue to result in no impacts on riparian habitat or other sensitive natural communities.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No operational impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

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

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As previously identified, the Project Site is fully developed and urbanized; no wetlands exist. The Proposed Stabilization Project is a construction effort that includes seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommission and demolition of the WCP, which are within the impact boundaries identified for the Approved Project. No change in land uses is proposed. All proposed activities would be within entirely developed areas void of protected wetlands. Therefore, the Proposed Stabilization Project would not affect protected wetlands and no impacts would continue to occur.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No operational impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Project Site is in an urban setting; there is no natural habitat on-site. As stated in the 2014 Master Plan EIR, the LAC+USC Medical Center Campus, including the Project Site, is not within or part of a wildlife corridor. No change in land use is proposed. The Proposed Stabilization Project would occur within the impact boundaries identified for the Approved Project. As with the Approved Project, the Proposed Stabilization Project would not pose substantial barriers or other impediments to wildlife movement or impede the use of wildlife nursery sites, and impacts related to wildlife movement would continue to be less than significant.

With respect to bird species that are protected under the Migratory Birt Treaty Act (MTBA), as with the Approved Project, the Proposed Stabilization Project would implement 2014 Master Plan EIR Mitigation Measure MM-BIO-1 to reduce impacts on MTBA-protected bird species to less than significant. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No operational impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As identified in the 2014 Master Plan EIR, native oak trees have been planted as part of the ornamental landscape in the LAC+USC Medical Center Campus, including the Project Site. As with the Approved Project, the Proposed Stabilization Project could result in removal of vegetation within the Project Site, which could include ornamental trees. There are coast live oak trees within the Project Site, which are protected under the Los Angeles County Oak Tree Ordinance. These protected trees would not be affected. However, as with the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation

Measure MM-BIO-3 to reduce impacts related to tree removal to a less than significant level. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No operational impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR identified that the Project Site is not in an area covered under an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, state habitat conservation plan. Therefore, the Proposed Stabilization Project, like the Approved Project, would not conflict with such conservation plans and no impacts related to conservation plans would occur.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No operational impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.4.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measures MM-BIO-1 through MM-BIO-3 from the 2014 Master Plan EIR are applicable to the Proposed Stabilization Project and have been incorporated into the Proposed Stabilization Project's MMRP.

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

- Disturbance of maternity roosting structures or trees (e.g., structure removal, construction equipment operation near roosts, tree trimming or removal) shall not occur during the maternity period (April 15 to September 15) to avoid impacts on reproductively active females and active maternity roosts (whether colonial or solitary). The maternity roost shall remain undisturbed from the time it is located until the following September 15 or until a qualified biologist has determined the roost is no longer active. No construction work shall occur at the roost or within a 100-foot-wide buffer zone (or an alternative width, as determined in consultation with CDFW) until September 15.
- Exclusion devices may be installed outside of the maternity period (September 16 to April 14) to preclude bats from occupying buildings during, or prior to the on-set of, construction. Exclusionary devices shall be installed only by or under the supervision of an experienced bat biologist. Eviction of bats roosting in trees outside the maternity season shall be done in favorable weather under the supervision of a qualified bat biologist and adhering to the following two-step removal process:
    - On Day 1, for trees with cavities, crevices, and exfoliating bark, and that are found to support roosting bats, Step 1 would be the removal of branches and limbs with no cavities. These limbs shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and

vibration) and physically alter the tree. Bats roosting in the tree, which may not have been detected during the preconstruction survey, will either abandon the roost immediately (rarely) or, after emergence, will avoid returning to the roost. For foliage roosting bats, Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. On Day 2, under the supervision of a qualified biological monitor familiar with the life history of subject bat species, the tree may be removed.

- Qualified biologists should search all downed roost trees for dead and injured bats. The presence of dead or injured bats that are species of special concern shall be reported to CDFW.

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

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

- If the removal of vegetation, demolition of buildings, or noise-generating construction activities are scheduled between February 15 and August 31, the County of Los Angeles Department of Public Works or the construction contractor shall retain a qualified biologist (i.e., experienced with conducting nesting bird surveys) who shall conduct a focused nesting bird survey prior to the start of vegetation removal, building demolition, or noise-generating activities within any potential nesting habitat (i.e., all vegetation, buildings, eaves on buildings, etc.). The size of the nesting bird survey area shall be determined by a qualified biologist at the time of the survey and include the entire limits of disturbance. It may also include a buffer area if deemed

necessary by the biologist. The preconstruction nesting bird surveys shall be conducted no more than 7 days prior to initiation of vegetation removal, building demolition, or noise-generating construction activities. If no active nests are detected during these surveys, no restrictions on project activities shall be necessary.

- If active nests are found, a qualified biologist shall identify and flag an appropriate buffer around the nest, and no construction activities shall occur within the buffer until the qualified biologist has determined that the young have fledged or the nest is no longer active. The specific buffer width shall be determined by a qualified biologist at the time of discovery and vary according to the bird species, site conditions, and the type of work activities to be conducted.

The survey results shall be submitted to County of Los Angeles Department of Public Works for review and approval of the recommended nest buffer areas, if any, prior to the commencement of any vegetation removal, building demolition, or noise-generating construction activities on the Project Site.

MM-BIO-3: Prior to the removal of any trees, a qualified arborist shall inventory native oak trees on the Project Site to support the application regarding the impacts on oak trees. Oak tree permit requests require a property owner to file an application with the Department of Regional Planning and provide a filing fee, an oak tree report, site plans for the property, and maps of the surrounding area. The oak tree report shall include information about the protection of oak trees that may be adjacent to construction activities that are to remain. The oak tree report shall also include the proposed replanting plan, in accordance with the required replacement ratio, for any oak trees that are to be removed.

4.5 CULTURAL RESOURCES

4.5.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The 2014 Master Plan EIR found that the Approved Project would result in unavoidable significant adverse historical resources impacts due to the proposed demolition of the Women's and Children's Hospital Building, which was determined eligible for listing in the California Register of Historical Resources. The 2014 Master Plan EIR also determined that impacts to

other historical resources due to individual projects under the Approved Project could be significant but would vary, depending on final plans. For example, alterations to 1933 retaining walls and circulation elements (State Street), which are character-defining features of the General Hospital setting, could cause an adverse change in the significance of the historic hospital building. Mitigation Measures MM-CR-1 through MM-CR-7 were adopted to reduce the impacts due to potential construction and operational impacts on the historical resources identified in the 2014 Master Plan EIR. Specific to mitigation measure MM-CR-7, an implementing project that proposes work within the setting of the General Hospital would be required to have a qualified architectural historian, historian, or historical architect prepare a State of California Department of Park and Recreation (DPR) 523 form for the General Hospital. The 2014 Master Plan EIR determined that the extent of impacts and the level to which they could be mitigated would be dependent on development of final project plans and the extent of potential alterations to the historical resources on the campus. Therefore, impacts were considered potentially significant after implementation of proposed mitigation measures and impacts to the Women's and Children's Hospital Building would remain significant and unavoidable.

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

Although the extent of Approved Project construction impacts would vary, depending on final plans, and would need to be analyzed in detail to determine what level of monitoring, if any, would be required, it is likely that paleontological resources could be encountered during Approved Project construction activities should excavation extend more than 6 feet below the original ground surface in Quaternary sediments or 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 are found, are expected to be reduced to a level of less than significant with implementation of Mitigation Measure MM-CR-9. Operation of the LAC+USC Medical Center campus under the proposed Approved Project would not affect historical, archaeological, or paleontological resources.

The LAC+USC Medical Center Campus is not 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, were expected to be reduced to a level of less than significant with implementation of Mitigation Measure MM-CR-10.

4.5.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	SU	No	No	No	**Yes**
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	LTS/M	No	No	No	**Yes**
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	LTS/M	No	No	No	**Yes**

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR identified several historical resources within the LAC+USC Medical Center Campus, including on the Project Site. Resources identified on the Project Site included

the Women's and Children's Hospital and associated Gatehouse (no longer extant), the General Hospital complex (including the Acute/General Hospital Building, ancillary Payroll/Visitor's Buildings, Quality Assurance Utilization/Patient's Building, Marengo Street and Zonal Avenue Gateways, and Forecourt), State Street, Viaduct/Tunnel, and the Pharmacy/Service Building. Additionally, the 2014 Master Plan EIR identified that construction activities would include the demolition of several structures—the Women's and Children's Hospital (demolished in 2021), Old Utility and Maintenance Facility (WCP), OPD, IRD, Parking Structures 10 and 12, several modular buildings, and storage and warehouse buildings. Moreover, the 2014 Master Plan EIR identified that substantial earthwork and grading would occur in the central part of the LAC+USC Medical Center Campus to construct parking structures, community amenities, open space, and paths.

The following assessment of potential historic impacts is supported by Appendix B.

Seismic Improvements and Maintenance to General Hospital Building

As identified in the 2014 Master Plan EIR and various assessments, the General Hospital Building is eligible for listing on the National Register and is listed on the California Register. The 2014 Master Plan EIR identified that development under the Approved Project may impact historical resources (see page 3.4-24 of the 2014 Master Plan EIR). While seismic improvements to the General Hospital Building were not specifically assumed in the 2014 Master Plan EIR; the 2014 Master Plan EIR assumed that work within the setting of the General Hospital could occur. The proposed seismic retrofit improvements are necessary to maintain the aging building and its historical significance. Additionally, these improvements are consistent with all of the objectives stated in the 2014 Master Plan EIR as identified in Section 3.2.3, *Proposed Stabilization Project Consistency with the 2014 Approved Project Objectives*, of this Addendum.

Though not specifically discussed in the 2014 Master Plan EIR, the 2010 Reuse Plan was reviewed and accepted by the State Office of Historic Preservation (OHP) and was a stipulation of the Memorandum of Agreement between FEMA, the OHP, and the County. Thus, the identified historic features and spaces as well as the recommendations for future work that are included in the 2010 Reuse Plan would continue to guide work under the Proposed Stabilization Project.

The Proposed Stabilization Project includes a targeted structural strengthening and seismic retrofit of the General Hospital Building, as well as clean out, remediation, and selective demolition of non-essential and non-historic elements. This selective demolition would expose key structural elements, prevent the unnecessary destruction of historic character-defining spaces and features and allow for hazardous materials remediation.

The proposed targeted structural strengthening and seismic retrofit component would include the evaluation of three potential retrofit options, including upgrading the building's foundation with new pillars, construction of targeted structural reinforcements, and construction of super walls to address discontinuous wall members in at the building's podium and lower floors. All three options have been designed to minimize impacts to the building's character-defining features and spaces, as identified in the 2010 Reuse Plan. Modifications would be limited to the interior and would not be visible from the exterior of the building. As concept or pre-design architectural and structural drawings for the stabilization of General Hospital are prepared, a qualified historic preservation consultant would review the drawings and provide early feedback to ensure that the designs conform with the 2010 Reuse Plan and the Secretary of the Interior's Standards for the Treatment of Historic Properties (the SOI's Standards). National Park Service Preservation Briefs 17 (Architectural Character) and 41 (Seismic Rehabilitation of Historic Buildings) would continue to guide the proposed work. Structural concept or predesign drawings prepared for the stabilization of General Hospital would be peer reviewed by a qualified structural engineer with experience in historic preservation, with a peer review report prepared. Any recommendations contained in the peer review report would be further explored as the design progresses. The qualified historic preservation consultant would continue to engage in design collaboration throughout the development of schematic design drawings, at which point a conformance review report or memo would be prepared describing the project and its conformance with the 2010 Reuse Plan and the SOI's Standards. Furthermore, the County intends to pursue Federal Historic Preservation Tax Incentives for the General Hospital Building's proposed rehabilitation work, which requires review by the National Park Service and the State OHP for compliance with the SOI's Standards

Because all activities and plans associated with the General Hospital Building would be consistent with recommendations of the approved 2010 Reuse Plan, reviewed by a qualified historic consultant, and reviewed and approved by the NPS and OHP for historic tax credits, the historic character and significance of the General Hospital Building would be retained and preserved and the Proposed Stabilization Project would meet SOI's Standards. According to CEQA Guidelines Section 15064.5(b)(3), projects that comply with the Standards benefit from a regulatory presumption that they would have a less than significant adverse impact on a historical resource. Thus, historical impacts to General Hospital Building resulting from seismic improvements and maintenance activities would be less than significant.

West Campus Demolition of Hazards and Structures

Several buildings and structures within the Proposed Stabilization Project boundary on the West Campus and surrounding the General Hospital Building exhibit widespread structural and functional deficiencies, including inconsistent foundation depths, extensive concrete cracking and spalling, corroded reinforcement, and inadequate lateral load connections. In addition to

their deteriorated condition, many of the structures contain hazardous materials, such as asbestos and lead, further limiting their feasibility for reuse.

The Proposed Stabilization Project includes demolition of several buildings and structures on the West Campus surrounding the General Hospital Building, including outbuildings, warehouses, trailers, and barracks (shown in Table 3). Removing structurally compromised, functionally obsolete, and hazardous-material-laden buildings and structures reduces ongoing liability, simplifies site logistics, allows for safer circulation and access across the campus, and creates opportunities for infrastructure upgrades.

As discussed in Section 3, *Project Description*, the majority of the buildings proposed for demolition under the Proposed Stabilization Project were previously identified to be demolished in the 2014 Master Plan EIR, which found that their proposed demolition would have no significant impact to historical resources.

Though not identified for demolition under the 2014 Master Plan EIR, the General Laboratory Building (#302) was surveyed by ICF and found ineligible for listing in the National Register and California Register (refer to 2014 Master Plan EIR, Table 3.4-4). Based on a review of previous documentation and limited supplemental research, there is no new evidence that this building would be considered a historical resource for the purpose of CEQA. The Mason Shop (#529) was built between 1999 and 2000 and is generally not old enough to be considered a historical resource for the purposes of CEQA.

West Campus Site Infrastructure, Remediation, and Accessibility

The West Campus presents a number of challenges related to its aging, fragmented, and poorly documented infrastructure. Specifically, much of its utility work (water, sewer, stormwater systems) is non-contiguous and in disrepair, and as-built documentation is incomplete, making the potential for utility conflict high. Additionally, the 40-foot elevation change from the east to the west ends of the site contributes to accessibility and design limitations, and environmental testing across the site has uncovered significant geotechnical and hazardous materials concerns (liquefaction zones, asbestos and lead-containing materials related to the site's medical and industrial use, and potential underground contaminants such as old fuel lines).

Following the demolition of select buildings and structures, a comprehensive utility survey would be undertaken to identify which utilities would remain in use, which would be abandoned, and which would be removed and rerouted. The rerouting and replacement would reconnect water, power, sanitary, and stormwater systems to reflect the revised site configuration and the needs of remaining buildings. The proposed work would also include comprehensive soil testing, including geotechnical testing and testing for hazardous materials. Soil removal, encapsulation, regrading, and compacting would be undertaken, as necessary.

New circulatory pathways for enhanced pedestrian Americans with Disabilities Act (ADA) accessibility would be added throughout the West Campus to improve access between key facilities (i.e., between parking areas and operational medical buildings). These activities were assumed within the 2014 Master Plan EIR, which envisioned a comprehensive redevelopment of the campus that would include utility and circulation enhancements, as well as site grading and soil remediation.

These proposed improvements would be limited to areas around the demolished buildings and would be focused on targeted areas. Any demolition or regrading undertaken as part of this scope will take care to minimize impacts to character-defining features of the General Hospital Building and setting, including but not limited to the historic forecourt and flanking ancillary buildings, historic retaining walls, and vehicular circulation (i.e., State Street). Mitigation Measures CR-5 and CR-7 from the 2014 Master Plan EIR would be implemented to reduce impacts to historical resources as appropriate. Furthermore, the Project team includes historic architects and consultants who meet the *Secretary of the Interior's Professional Qualifications Standards* to ensure that the infrastructure work would not adversely affect the historic significance of the General Hospital Building as the Proposed Stabilization Project progresses. Therefore, historical impacts associated with site infrastructure, remediation, and accessibility would be less than significant.

West Central Plant Decommissioning and Demolition

The West Central Plant (WCP) is outdated with a limited life expectancy remaining. Sitewide utilities originate from the WCP, but the plant is operating with significant capacity loss and unsafe conditions. The chilled water system is ill-equipped; the cooling tower system requires regular maintenance and the make-up water connections are in poor condition; and the steam boiler system's piping is inefficient and leaks.

Once the General Hospital Building's proposed maintenance and seismic retrofit work commences and the building is disconnected from the WCP, the only remaining buildings served by the WCP will be the OPD/IRD and the Medical Examiner buildings. The proposed work includes the construction of new standalone heating and cooling systems to service these buildings. The 16-ton chillers located on the General Hospital terrace, which receives soft water from the WCP but is otherwise independent, would transition to an alternative water system. Once the new localized heating and cooling systems and transitioning of the water supply occurs, the WCP would be decommissioned and demolished. Constructed in 1962, the building was found ineligible for listing in the National Register and California Register during ICF's field survey for the 2014 Master Plan EIR. Based on a review of previous documentation and limited supplemental research, there is no new evidence that the building would be considered a historical resource for purposes of CEQA. Furthermore, demolition of the Central Plant was proposed in the 2014 Master Plan EIR and has already been determined to have no significant

impact to historical resources. A permanent location has not yet been identified, but a modular, more flexible facility would be provided to better meet the demands of the campus. The ultimate location will be determined, and will be approved by a qualified historic consultant to confirm no impacts to the historical setting around the General Hospital Building. Therefore, impacts associated with demolition of the WCP and a temporary new facility would be less than significant.

Summary

In summary, three elements of the Proposed Stabilization Project (demolition of hazards and structures; infrastructure, remediation, and access improvements; and decommissioning of the WCP) were all envisioned in the scope of the 2014 Master Plan EIR, and previously adopted Mitigation Measures MM CR-5 and MM CR-7 would apply and adequately mitigate potential impacts to historical resources. While the seismic retrofit and maintenance of the General Hospital Building were not assumed in the 2014 Master Plan EIR, the building was identified within the Project Site boundaries, and the improvements would be executed in a manner that ensures the historic character and significance of the building is maintained. Additionally, while the demolition of the General Laboratory and the Mason Shop was not assumed in the 2014 Master Plan EIR, these structures were determined, based on limited subsequent research, to not be considered historic resources under CEQA and the demolition of these structures would not exceed the impacts disclosed in the 2014 Master Plan EIR. Although the Proposed Stabilization Project would result in less than significant impacts, the Proposed Stabilization Project would not reduce the Approved Project's significant and unavoidable impacts.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No operational impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines**.**

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As identified in the 2014 Master Plan EIR, the LAC+USC Medical Center Campus has experienced

surface disturbances over the past 130 years; thus, there is a low likelihood of encountering prehistoric and historical resources beneath the ground's surface. Ground-disturbing activities associated with the Proposed Stabilization Project would occur within the area of impact analyzed in the 2014 Master Plan EIR and would include areas identified for redevelopment under the Approved Project. As with the Approved Project, the Proposed Stabilization Project would implement 2014 Master Plan EIR Mitigation Measure MM-CR-8 to reduce impacts on archaeological resources to a less than significant level. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No operational impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As identified in the 2014 Master Plan EIR, ground-disturbing activities have the potential to unearth human remains. Ground-disturbing activities associated with the Proposed Stabilization Project would occur within the area of impact analyzed in the 2014 Master Plan EIR and would include areas identified for redevelopment under the Approved Project. As with the Approved Project, during construction of the Proposed Stabilization Project, 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 in accordance with State Health and Safety Code Section 7050.5. Additionally, the Proposed Stabilization Project would implement 2014 Master Plan EIR Mitigation Measure MM-CR-10 to ensure compliance with State Health and Safety Code Section 7050.5. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No operational impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.5.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measures CR-5 and CR-7 have been incorporated into the Proposed Stabilization Project's MMRP. In addition, as discussed in the preceding analysis, the Project team includes historic architects and consultants who meet the *SOI's Professional Qualifications Standards* to ensure that the infrastructure work would not adversely affect the historic significance of the General Hospital building as the Project progresses. Regarding archaeological resources, paleontological resources, and human remains, Mitigation Measures MM CR-9 through MM-CR-10 from the 2014 Master Plan EIR would be implemented given the proposed ground-disturbing activity included in the Proposed Stabilization Project and have been incorporated into the Proposed Stabilization Project's MMRP. Mitigation Measure MM CR-1 is not applicable to the Proposed Stabilization Project because the Proposed Stabilization Project does not include any modifications to the retaining walls or overall setting of State Street. The Women's and Children's Hospital was demolished pursuant to the findings of the 2014 Master Plan EIR; therefore, Mitigation Measure MM CR-2 is not applicable. Mitigation Measure MM CR-3 is not applicable because no alterations to the viaduct/tunnel are proposed. Mitigation Measure MM CR-4 is not applicable to the Proposed Stabilization Project because no modifications to the Old Administration Building or the Pharmacy/Service Building are proposed. Mitigation Measure MM-CR-6 is not applicable because the Project does not propose any new development on the campus.

> **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-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 paleontological personnel, determined to have a low potential for containing fossil resources. The paleontological 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.

4.6 ENERGY

4.6.1 Summary of Impacts Identified in the 2014 Master Plan EIR

Energy was evaluated in connection with the Greenhouse Gas Emissions and Utilities and Service Systems sections of the 2014 Master Plan EIR. The 2014 Approved Project included energy-efficient project design features and plans for solar electric power, solar thermal and hot water, and 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 in energy use. The 2014 Master Plan EIR determined that energy impacts would be less than significant. SoCalGas had only projected supplies through 2030, and therefore the availability of natural gas was identified as a significant impact with respect to utilities; however, this was not an impact related to inefficient or wasteful use of energy.

4.6.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LTS	No	No	No	**Yes**
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	LTS	No	No	No	**Yes**

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As identified in the 2014 Master Plan EIR, construction activities associated with the Approved Project would not result in a permanent increase in energy demand; additional energy consumption would be limited in duration and finite. The Proposed Stabilization Project is within the impact boundaries identified for the Approved Project in the 2014 Master Plan EIR and would occur within the lifespan of the Approved Project. As with the Approved Project, the Proposed Stabilization Project's construction would create temporary increased demand for electricity and vehicle fuels and would result in short-term energy use. The Proposed Stabilization Project would use construction contractors that demonstrate compliance with applicable California Air Resources Board regulations governing the accelerated retrofitting,

repowering, or replacement of heavy-duty diesel on- and off-road equipment. Although the Proposed Stabilization Project includes construction activities not previously analyzed in the 2014 Master Plan EIR, namely the proposed seismic retrofit activities and the demolition of two additional buildings not previously identified, the construction activities associated with the seismic retrofit and additional demolition would not include new equipment, intensity, or new construction methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Additionally, the construction activities analyzed in the 2014 Master Plan EIR have not been implemented or realized. The Proposed Stabilization Project would not result in the wasteful, inefficient, and unnecessary consumption of energy. Construction impacts related to energy would continue to be less than significant.

The WCP currently supplies power to the IRD Building, OPD Building, Medical Examiner Building, and parts of the General Hospital. The WCP also provides central heating and chilled water to several buildings both on- and off-site, but the WCP is struggling to meet the demands of the current infrastructure. Studies indicate the WCP is operationally inefficient. Even though the plant is oversized for the current load, leakages in the steam system tunnels lose about 50 percent of the steam. The steam boiler system, consisting of gas-fired boilers installed in 2013, is constrained. It is operating at reduced capacity to mitigate energy waste, but the boilers are tied to a deteriorating network of original 1962 steam pipes. The proposed decommissioning and relocation of the WCP would optimize current utility operations. Therefore, the Proposed Stabilization Project would improve energy efficiency on-site and would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No impacts related to energy would occur.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts related to energy consumption would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The National Resources Agency revised Appendix G of the CEQA Guidelines, effective January 2019, to capture the requirements of Appendix F of the State CEQA Guidelines, including this

checklist item related to consistency with State or local plans for renewable energy or energy efficiency. The 2014 Master Plan EIR does not include a discussion related to this specific checklist topic because it was certified before the item was added to the CEQA Guidelines.

The Proposed Stabilization Project does not include the redevelopment of the Project Site with structures or propose new structures within the Project Site. The proposed seismic retrofit of the General Hospital would increase the building's structural integrity. Under the Proposed Stabilization Project, the General Hospital would continue to operate under existing conditions. The Proposed Stabilization Project would use construction contractors that demonstrate compliance with applicable Air Resources Board regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Any modifications to utility infrastructure would be conducted to right-size utilities and minimize wasteful and inefficient use of energy.

The WCP currently supplies power to the Juvenile Hall, Intern and Residents Dormitory, Outpatient Department, Medical Examiner Building, and parts of the General Hospital. The WCP also provides central heating and chilled water to several buildings on- and off-site, but struggles to meet the demand. Studies indicate the WCP is operationally inefficient. Leakages in the steam system tunnels lose about 50 percent of the steam, the plant is oversized for the current load, and the piping system is highly inefficient (see discussion in 4.6.2a). The proposed decommissioning and relocation of the WCP would improve energy efficiency on-site; therefore, it would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No impacts related to energy would occur.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts related to energy would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.6.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

No mitigation measures related to energy were in the 2014 Master Plan EIR, and no new mitigation measures would be required for the Proposed Stabilization Project.

4.7 Geology and Soils

4.7.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The 2014 Master Plan EIR determined that impacts to geology and soils would be less than significant with mitigation. The LAC+USC Medical Center Campus is not transected by known active or potentially active faults. The active Upper Elysian Park blind thrust fault is approximately 0.4 mile north of the center of the campus; the active Raymond fault is approximately 4.2 miles north, and the active Hollywood fault is approximately 4.3 miles to the northwest. 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 of the Approved Project would be in 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 LAC+USC Medical Center Campus could result in significant impacts on future improvements. However, development of the Approved Project would adhere to all applicable seismic design requirements and guidelines. Additionally, implementation of structural design mitigation measures (see MM-GEO-1, below) would reduce potential seismic ground shaking impacts to a less-than-significant level.

According to the preliminary geotechnical evaluation prepared for the Approved Project, the western portion of the LAC+USC Medical Center Campus is in an area that is considered susceptible to liquefaction. Other areas of the campus that are not mapped by the State 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 damage of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving and cracking of pavement due to sand boiling, and the buckling of deep foundations due to liquefaction-induced ground settlement. Mitigation measures identified in MM-GEO-1 would reduce the potentially significant liquefaction hazards impacts to campus development to a less than significant level.

The potential for future landslides or mudflows to affect development in the Project area is relatively low, and significant impacts are not anticipated. Slopes created for future

developments in the project area would be designed to reduce the potential for landslides or mudflows. This would be considered a less than significant impact.

Construction of Approved Project facilities and improvements could result in ground surface disruption, including disruptions from grading and excavation activities. Such activities could result in erosion at the LAC+USC Medical Center Campus during construction. However, construction projects that result in ground disturbance of one acre or more must apply for a Stormwater General Permit under the National Pollutant Discharge Elimination System (NPDES). All construction would follow best management practices (BMP) 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's 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, Approved Project impacts would be less than significant. During long-term operation of proposed developments and improvements at the LAC+USC Medical Center 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, proposed stormwater and low impact development features (i.e., bioretention and wetland/detention areas) would also minimize runoff and the potential for soil erosion. Therefore, operational impacts would be less than significant.

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

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

Because of the presence of potentially compressible/collapsible soils at the campus, the potential exists for differential settlement to cause damage to project improvements. The potential impacts of settlement would be considered significant without appropriate mitigation implemented during detailed project design and construction. Mitigation measures, including

removal of compressible/collapsible soils and replacement with compacted fill, would reduce potential impacts to less than significant.

The near-surface soils at the LAC+USC Medical Center Campus are composed predominantly of sandy, coarse-grained materials. These soils typically have a low expansion potential. However, clayey soils may be present in areas that were not observed. If construction activities occur on soils that are known to be potentially expansive, the impact on proposed future improvements could be significant. Implementation of the proposed Mitigation Measure GEO-1 would reduce potential impacts from expansive soils to less than significant.

The LAC+USC Medical Center Campus is served by local sewer lines that would convey wastewater to City of Los Angeles wastewater treatment facilities. No septic tanks are proposed as part of the project.

4.7.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	**Level of Impact in Certified EIR**	**Conditions Requiring Subsequent Review**			**Stabilization Project Meets the Conditions for an Addendum** *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
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.	LTS/M	No	No	No	**Yes**
ii) Strong seismic ground shaking?	LTS/M	No	No	No	**Yes**
iii) Seismic-related ground failure, including liquefaction?	LTS/M	No	No	No	**Yes**
iv) Landslides?	LTS/M	No	No	No	**Yes**
b) Result in substantial soil erosion or the loss of topsoil?	LTS	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	LTS/M	No	No	No	**Yes**
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	LTS/M	No	No	No	**Yes**
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	LTS	No	No	No	**Yes**
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTS/M	No	No	No	**Yes**

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.

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR identified that the LAC+USC Medical Center Campus, including the Project Site, is not transected by known active or potentially active faults. The active Upper Elysian Park blind thrust fault is approximately 0.4 mile north of the center of the campus, the active Raymond fault is approximately 4.2 miles north, and the active Hollywood fault is approximately 4.3 miles to the northwest. The stabilization components of the Proposed Stabilization project are within the boundaries of the LAC+USC Medical Center; therefore, like the Approved Project, 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. The Proposed Stabilization Project includes the seismic retrofit of the General Hospital, which would strengthen the structure and limit movement to prevent costly damage and preserve historic character. The demolition of hazardous structures on the West Campus would also reduce the risk of loss, injury, or death related to fault rupture. Impacts related to fault rupture would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No impacts would occur. Impacts related to fault rupture would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

ii) Strong seismic ground shaking?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization Project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. Southern California is a seismically active region, and the potential exists for seismic ground shaking on

the Project Site. 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 Proposed Stabilization Project includes the seismic retrofit of the General Hospital, which would strengthen the structure and limit movement to prevent costly damage and preserve historic character. The demolition of hazardous structures on the West Campus would also reduce the risk of loss, injury, or death related to seismic shaking. Impacts related to seismic shaking would be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No impacts would occur. Impacts related to seismic ground shaking would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

iii) Seismic-related ground failure, including liquefaction?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project in the 2014 Master Plan EIR. The preliminary geotechnical evaluation prepared for the Approved Project found that the western portion of the LAC+USC Medical Center Campus is in an area considered susceptible to liquefaction. Other areas of the campus could also be subject to liquefaction though they are not indicated as such on the state map. However, no new development is proposed, and the Proposed Stabilization Project consists primarily of demolition, remediation, and infrastructure/accessibility improvements. Liquefaction would not pose a significant impact to the activities proposed. Impacts related to liquefaction would be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No impacts would occur. Impacts related to ground failure would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

iv) Landslides?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. The preliminary geotechnical evaluation prepared for the Approved Project determined that the potential for future landslides or mudflows to affect developments within the LAC+USC Medical Center Campus is relatively low, and significant impacts are not anticipated. Impacts would be less than significant. Therefore, impacts related to landslides would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No impacts would occur. Impacts related to landslides would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Result in substantial soil erosion or the loss of topsoil?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. The preliminary geotechnical evaluation prepared for the Approved Project identified subsurface soils found at the LAC+USC Medical Center Campus to include silty clay, silty to clayey sand soils, interbedded sandstone, and a shale rock formation. Sandy soils typically have a relatively higher potential for erosion from surface runoff when exposed in cut slopes or utilized near the face of fill embankments. Surface soils with higher amounts of clay tend to be less erodible because the clay acts as a binder that holds the soil particles together. Ground surface disruption during excavation, grading, and trenching as part of the Proposed Stabilization Project would create the potential for erosion. However, as described in Section 4.10, *Hydrology and Water Quality*, any

project involving grading of an area greater than one acre is required to apply for a National Pollutant Discharge Elimination System permit from the Los Angeles Regional Water Quality Control Board. This permit requires preparation and implementation of a Stormwater Pollution Prevention Plan that incorporates best management practices for erosion control. Mitigation Measure MM-GEO-2 would apply.

Construction activity under the Proposed Stabilization Project includes clearing, excavation, stockpiling, and reconstruction of existing facilities involving removal and replacement. Implementation of best management practices would ensure that sediment would be confined to the construction area and not transported off-site. Therefore, impacts related to soil erosion would be less than significant with implementation of mitigation. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No impacts would occur. Impacts related to soil erosion would not occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project in the 2014 Master Plan EIR. Mapped areas of subsidence are not found in the City or County of Los Angeles. Therefore, the potential for subsidence on the Project Site is relatively low. This would be considered a less than significant impact. The Proposed Stabilization Project includes the demolition of hazards and structures, site remediation, infrastructure and accessibility improvements, and decommissioning and demolition of the WCP within the West Campus. No development of new structures is proposed. General construction activities analyzed in the 2014 Master Plan EIR included the demolition of numerous structures (approximately 722,709 square feet of total demolition). Additionally, implementation of the Approved Project were assumed to involve excavation and grading activities. The Proposed Stabilization Project would be within the impact boundaries

identified for the Approved Project in the 2014 Master Plan EIR. Impacts would be less than significant. Impacts related to unstable soils would continue to be less than significant.

The 2014 Master Plan EIR determined that because of the presence of potentially compressible/collapsible soils at the LAC+USC Medical Center Campus, differential settlement could cause damage to proposed improvements. However, the Proposed Stabilization Project consists of demolition and limited, focused new improvements (related to accessibility). No vertical construction or new development is proposed. Therefore, no impacts related to unstable soils issues are anticipated. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. The preliminary geotechnical evaluation prepared for the Approved Project determined that the near-surface soils at the LAC+USC Medical Center Campus 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. The Proposed Stabilization Project's construction activities would not occur outside of the boundaries identified for impact in the 2014 Master Plan EIR. The proposed demolition, excavation, and grading activities would be limited to the Project Site. Impacts would be less than significant

The Proposed Stabilization Project would not result in any new development that could be located on expansive soils. The Proposed Stabilization Project would result in less than significant impacts and would not require mitigation. Impacts related to expansive soil would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed

for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. Implementation of the Proposed Stabilization Project would not involve the construction or use of septic tanks or other alternative wastewater disposal system. Therefore, as with the Approved Project, the Proposed Stabilization Project would result in no impacts.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No impacts would occur. Impacts related to incapable soil would not occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. The 2014 Master Plan EIR determined that no fossils are known within the LAC+USC Medical Center Campus, including the Project Site. However, late Pleistocene localities that produced mammoth, mastodon, giant ground sloth, and saber-toothed cat are known from nearby locations. Therefore, as with the Approved Project, the Proposed Stabilization Project's

construction activities have the potential to impact paleontological resources. Thus, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR MM-CR-9 to reduce impacts on paleontological resources. Impacts would be less than significant. Impacts would continue to be less than significant with implementation of mitigation.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No impacts would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.7.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measures MM-CR-9 (see Section 4.5.3) and MM-GEO-2 from the 2014 Master Plan EIR is applicable to the Proposed Stabilization Project and has been incorporated into the Proposed Stabilization Project's MMRP. Mitigation Measure MM-GEO-1 is not applicable to the Proposed Stabilization Project because the Proposed Stabilization Project is not a development project.

> **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.

4.8 GREENHOUSE GAS EMISSIONS

4.8.1 Summary of Impacts Identified in the 2014 Master Plan EIR

Long-term operation of Approved Project facilities would result in GHG emissions from fuel combustion (i.e., from on-road motor vehicles traveling to and from the campus); natural gas, electricity, and water consumption; and wastewater and solid waste generation. Total annual GHG emissions due to the Approved Project were expected to exceed the threshold of 3,000 metric tons of carbon dioxide equivalence ($MTCO_2e$), resulting in a significant impact prior to mitigation. To put Approved Project emissions into perspective, statewide CO_2e emissions for 2012 were estimated to be 458.7 million MT (MMT) CO_2e; the anticipated buildout total under the proposed Approved Project was 37,281 $MTCO_2e$, or 0.037281 $MMTCO_2e$. In addition to Implementation of Mitigation Measure MM-GHG-1 and project-specific design features, actions undertaken by the State would further reduce project-related GHGs in the future. Nonetheless, net project GHG would continue to exceed the 3,000 $MTCO_2e$ significance threshold after incorporation of mitigation measures. As such, this impact was considered significant and unavoidable.

By adopting all feasible project design and mitigation measures to reduce GHG emissions, the Approved Project would be consistent with and not conflict with any AB 32 Scoping Plan measures, nor would it be inconsistent in any way with the AB 32 goal of reducing statewide GHG emissions to 1990 levels by year 2020. As such, the Approved Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Impact was considered less than significant with Mitigation Measure MM-GHG-1 incorporated.

4.8.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	SU	No	No	No	**Yes**
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	LTS	No	No	No	**Yes**

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. It should be noted that GHG emissions are measured exclusively as cumulative impacts; therefore, construction emissions are considered part of the GHG emissions for a project's life cycle, including during operation.

As with the Approved Project, the Proposed Stabilization Project's construction activities would result in short-term GHG emissions due to fuel combustion associated with on- and off-road construction equipment and vehicles. The 2014 Master Plan EIR concluded that net Approved Project GHG emissions would exceed the 3,000 $MTCO_2e$ significance threshold after incorporation of mitigation measures. Because the Proposed Stabilization Project's construction activities are within the impact boundaries identified for the Approved Project and would occur within the 25-year Approved Project life cycle the Proposed Stabilization Project's construction-related GHG emissions were accounted for in the 2014 Master Plan EIR. Although the Proposed

Stabilization Project would include construction activities not previously analyzed in the 2014 Master Plan EIR and includes the demolition of two additional buildings, the proposed construction activities associated would not result in new equipment, intensity or new construction methods that would substantially increase GHG emission disclosed in the 2014 Master Plan EIR. Additionally, as previously discussed, the majority of construction emissions evaluated in the 2014 Master Plan EIR have not been implemented or realized to date; therefore, emissions generated by the Proposed Stabilization Project would fall within the emissions envelope assumed in the 2014 Master Plan EIR. Any future development pursuant to the 2014 Master Plan would undergo separate CEQA review to determine consistency with prior assumptions.

The Proposed Stabilization Project includes the decommissioning and relocation of the WCP. The steam boiler system within the plant is constrained. While operating at reduced capacity to mitigate energy waste, the boilers are tied to a deteriorating network of original 1962 steam pipes. This piping system is highly inefficient, with up to 50 percent of capacity lost to leaks during operation. As a result, significantly more natural gas must be burned to meet heating demands, directly increasing greenhouse gas emissions. The proposed decommissioning and relocation of the WCP would optimize current utility operations and reduce greenhouse gas emissions because less natural gas would be burned to meet demands and the new facility would be constructed to meet current energy efficiency standards.

The Proposed Stabilization Project does not include new development within the Project Site, nor would it result in any changes to vehicle trips, which are the largest contributor to greenhouse gas emissions. The Proposed Stabilization Project would not alter the operational conditions analyzed for the Approved Project in the 2014 Master Plan EIR. As with the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR MM-AQ-2 and MM-AQ-3 to ensure a properly maintained construction fleet and limiting idling. Impacts would remain significant and unavoidable.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Proposed Stabilization Project's construction activities are within the impact boundaries identified for the Approved Project analyzed in the 2014 Master Plan EIR and the proposed construction activities associated with the seismic retrofit of the General Hospital would include

standard construction equipment and standard construction methods. Therefore, the Proposed Stabilization Project would be consistent with the County's Climate Action Plan GHG reduction strategies, as applicable. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Thus, the Proposed Stabilization Project would not conflict with achievement of the County's GHG emissions reduction target.

The Proposed Stabilization Project would not alter the operational conditions anticipated for the Approved Project as analyzed in the 2014 Master Plan EIR. Thus, the Proposed Stabilization Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As with the Approved Project, with the incorporation of applicable and feasible mitigation measures, impacts to applicable regulations would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR Mitigation Measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.8.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measure MM-GHG-1 is not applicable to the Proposed Stabilization Project because the Proposed Stabilization Project does not include the development or operation of structures within the Project Site.

Mitigation Measures MM-AQ-2 and MM-AQ-3 from the 2014 Master Plan EIR are applicable to the Proposed Stabilization Project and have been incorporated into the Proposed Stabilization Project's MMRP.

4.9 HAZARDS AND HAZARDOUS MATERIALS

4.9.1 Summary of Impacts Identified in the 2014 Master Plan EIR

Approved Project construction would involve the routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and caulking. Given that Approved

Project facilities would be required to comply with applicable regulations—such as the Resource Conservation and Recovery Act, Department of Transportation Hazardous Materials Regulations, and local Certified Unified Program Agency regulations—and given the small amounts of hazardous materials that would be used during the construction phase, the Approved Project 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.

The Bravo Medical Magnet High School, the LAC+USC Children's Center, and East Los Angeles Occupational Center are within a quarter mile of the LAC+USC Medical Center Campus. Site buildings designated for future demolition or renovation may contain asbestos-containing materials and lead-based paints. The presence of ACM and LBP is a potential environmental concern (PEC). The presence of thermal system insulation, which is in fair condition in the tunnel between General Hospital and the Pharmacy Building, 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 LAC+USC Medical Center Campus is a PEC. Monitoring wells, indicating groundwater contaminated with petroleum hydrocarbons, were observed north of General Hospital in an area with a known open remediation process. This is indicative of a PEC.

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

Two gas stations formerly occupied the southeast portion of the LAC+USC Medical Center Campus, which indicates the potential for releases from USTs at the sites and represents a PEC for the LAC+USC Medical Center Campus.

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

No significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous waste during operation of LAC+USC Medical Center Campus facilities is anticipated. Impacts would be less than significant.

Compliance with federal, state, and local regulations, in combination with construction best management practices (BMPs) implemented as part of a Stormwater Pollution Prevention Plan,

would ensure that operational impacts related to routine transport, use, or disposal of hazardous waste would be less than significant. Implementation of Mitigation Measures MM-HAZ-1 through MM-HAZ-3 would also ensure that all hazardous materials would be used, stored, and disposed of properly, which would minimize potential impacts related to hazardous materials releases.

Furthermore, any accidental spills of materials considered hazardous would be confined immediately, with the materials removed and disposed of in accordance with all applicable safety regulations and disposal methods.

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

Additionally, all hazardous materials would be handled in accordance with all applicable rules and regulations. Biomedical wastes would be handled and transported for disposal during operation of future facilities. Current safety protocols for such materials at the LAC+USC 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 the Approved Project facilities would result in a less-than-significant impact related to hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

Impacts due to exposure to or disturbance of hazardous materials or wastes would generally be limited to the LAC+USC Medical Center Campus. Any hazardous waste being hauled to and from the LAC+USC Medical Center 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 Approved Project would comply with all applicable regulations, impacts on nearby schools would be less than significant. Additionally, implementation of Mitigation Measures MM-HAZ-1 through MM-HAZ-3 would ensure that no adverse impacts on nearby schools would occur.

Although the LAC+USC Medical Center 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 Approved Project would result in a less-than-significant impact.

The PECs identified in the Environmental Setting section of the 2014 Master Plan EIR generally do not pose a significant hazard to the campus or occupants of existing buildings on the campus

unless the sites are disturbed during construction and hazardous materials are released into the environment. Therefore, operation of future facilities is not expected to result in significant increased hazards to the public or the environment due to the proximity of those facilities to existing hazardous materials sites.

The LAC+USC Medical Center Campus is not located within 2 miles of a public or private airstrip.

Construction activities could temporarily impair and/or interfere with emergency response access in the vicinity of the LAC+USC Medical Center 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 LAC+USC Medical Center Campus and nearby properties (see Mitigation Measures MM-PS-1 in Section 3.12, Public Services, and MM-TRAF-1 in Section 3.14, Transportation/Traffic of the 2014 Final EIR). New buildings proposed under the Approved Project would be designed to conform to County of Los Angeles Fire Department standards for emergency ingress/egress and clearances, and the new buildings would be integrated into the existing emergency response plan and emergency evacuation plan for the site. The County of Los Angeles Fire Department reviews building plans to ensure conformance with these standards as part of the standard building plan approval process.

While it is acknowledged that buildout of the Approved Project would increase traffic congestion around the LAC+USC Medical Center Campus, no significant impacts during project operation would be expected because the Approved Project would allow for adequate access through and to the LAC+USC Medical Center Campus.

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

4.9.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LTS/M	No	No	No	**Yes**
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	LTS/M	No	No	No	**Yes**
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LTS	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	LTS/M	No	No	No	**Yes**
e) For a project 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 or excessive noise for people residing or working in the project area?	LTS	No	No	No	**Yes**
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LTS/M	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	LTS	No	No	No	**Yes**

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As with the Approved Project, the Proposed Stabilization Project would involve the routine transport, use, and disposal of hazardous materials, as well as the proper handling, storage, and transport of hazardous materials that may be present in demolition material. Like the Approved Project, the Proposed Stabilization Project would be required to comply with applicable regulations, such as the Resource Conservation and Recovery Act, Department of Transportation Hazardous Materials Regulations, and local Certified Unified Program Agency's regulations. Moreover, the Proposed Stabilization Project would not include new construction equipment, intensity, or methods that would create a significant hazard to the public or the environment. Additionally, given the small amounts of hazardous materials that would be used during the construction phase, the Proposed Stabilization Project would not be expected to create a significant hazard to the public, and impacts would continue to be less than significant.

The Proposed Stabilization Project's demolition component was anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR and the presence of ACMs and LBPs were anticipated in the buildings to be demolished. Additionally, the 2014 Master Plan EIR identified that indications of USTs were observed is several locations of the LAC+USC Medical Center Campus during site reconnaissance conducted for the Approved Project. With respect to the

Proposed Stabilization Project, USTs were observed near the WCP and General Hospital. Moreover, clarifiers were observed north of the WCP. Because the Proposed Stabilization Project is largely within the scope of the Approved Project and would occur within the life cycle (through 2040) of the Approved Project identified in the 2014 Master Plan EIR, the Proposed Stabilization Project's impacts were accounted for in the 2014 Master Plan EIR. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new hazardous risks that would result in impacts that exceed those described in the 2014 Master Plan EIR. As with the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measures MM-HAZ-1 through MM-HAZ-3 to reduce impacts to a less-than-significant level. Impacts would continue to be less than significant with implementation of these measures.

Anticipated hazardous materials encountered within the General Hospital Building are consistent with those assumed in the 2014 Master Plan EIR (i.e., ACMs, LBP, etc.). The Proposed Stabilization Project's seismic retrofit activities would comply with the Secretary of the Interior's standards for historic preservation. The Proposed Stabilization Project would ensure the preservation of the existing historical resources of the General Hospital Building. Due to the age of the General Hospital, there is a potential for ACMs and LBP to be present within the building. However, as with the Approved Project, the Proposed Stabilization Project, these materials were anticipated in other buildings to be demolished and would incorporate 2014 Master Plan EIR Mitigation Measures MM-HAZ-1 through MM-HAZ-3 to reduce impacts to a less-than-significant level. Impacts would continue to be less than significant with implementation of these measures.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts related to the transport, use, or disposal of hazardous materials would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR Mitigation Measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As with the Approved Project, typical construction-related hazardous materials would be used during the construction of the Proposed Stabilization Project. Additionally, as noted in Impact 4.9.2(a), ACM and LBP in buildings within the Project Site could be released during demolition and seismic retrofit. However, compliance with federal, State, and local regulations in combination with construction BMPs implemented as part of the SWPPP would ensure that impacts related to accidental release of hazardous materials would be less than significant. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new hazardous risks that would result in impacts that exceed those described in the 2014 Master Plan EIR. As with the Approved Project, the Proposed project would incorporate 2014 Master Plan EIR Mitigation Measures MM-HAZ-1 through MM-HAZ-3 to ensure that all hazardous materials would be used, stored, and disposed of properly, which would minimize potential impacts related to hazardous materials releases. Moreover, as with the Approved Project, 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. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts related to the release of hazardous materials would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR Mitigation Measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As identified in the 2014 Master Plan EIR, the Bravo Medical Magnet High School, the LAC+USC Children's Center, and East Los Angeles Occupational Center are within a quarter mile of the LAC+USC Medical Center Campus, including the Project Site. As with the Approved Project, the Proposed Stabilization Project includes demolition of structures that may contain ACMs and LBPs, and excavation activities in the vicinity of the USTs may disturb or result in the release of hazardous materials. As with the Approved Project, the Proposed Stabilization Project would

occur within the boundaries of the LAC+USC Medical Center Campus. Moreover, any hazardous waste hauled to and from the Project Site would be secured and contained in accordance with applicable regulations to prevent its release. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new hazardous risks that would result in impacts that exceed those described in the 2014 Master Plan EIR. Nonetheless, as with the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measures MM-HAZ-1 through MM-HAZ-3 to ensure no adverse impacts to nearby schools. Impacts related to hazardous emissions in proximity to schools would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts would continue to be less than significant with implementation of these measures.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR Mitigation Measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As discussed in the 2014 Master Plan EIR, the LAC+USC Medical Center Campus, including the Project Site, is listed in several databases. The Proposed Stabilization Project would occur within the impact boundaries identified for the Approved Project. Like the Approved Project, the Proposed Stabilization Project's construction activities have the potential to expose construction personnel to hazardous wastes during construction. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new hazardous risks that would result in impacts that exceed those described in the 2014 Master Plan EIR. As with the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measures MM-HAZ-1 through MM-HAZ-3 to reduce impacts to a less-than-significant level. Impacts would continue to be less than significant with implementation of these measures.

The Proposed Stabilization Project would not alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts related to hazardous materials sites would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR Mitigation Measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

e) For a project 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 or excessive noise for people residing or working in the project area?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As discussed in the 2014 Master Plan EIR, the LAC+USC Medical Center Campus, including the Project Site, is not within an airport land use plan or within 2 miles of a public airport or public use airport. The Proposed Stabilization Project is within the boundaries of the impact area analyzed in the 2014 Master Plan EIR. Thus, as with the Approved Project, the Proposed Stabilization Project would have no impact related to excessive noise for people residing or working in the project area.

The Proposed Stabilization Project would not alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No impact would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As with the Approved Project, the Proposed Stabilization Project would not impair or physically interfere with adopted emergency response or evacuation plans. Like the Approved Project,

during the Proposed Stabilization Project's construction, temporary lane closures may be required, but vehicular access to existing medical facilities would be maintained at all times. Additionally, the Proposed Stabilization Project would improve circulation and accessibility within the Project Site. Nonetheless, the Proposed Stabilization Project would implement 2014 Master Plan EIR Mitigation Measures MM-PS-1 and MM-TRAF-1 to ensure impacts related to emergency access would continue to be less than significant with implementation of these measures.

The Proposed Stabilization Project would not alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

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

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR identified that the LAC+USC Medical Center Campus, including the Project Site, is in a highly urbanized area and not adjacent to or intermixed with wildlands. Hazard Park, a 26.5-acre park approximately 0.11 mile east of the LAC+USC Medical Center Campus, is the only area with a large amount of vegetation in the area; however, this area is managed and landscaped with no connection to wildland fires. The Proposed Stabilization Project would occur within the boundaries of the impact area analyzed in the 2014 Master Plan EIR. Like the 2014 Master Plan EIR, the Proposed Stabilization Project would have no impacts related to wildland fires.

The Proposed Stabilization Project would not alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. No impact would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed

Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.9.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measures MM-HAZ-1 through MM-HAZ-3 from the 2014 Master Plan EIR from the 2014 Master Plan EIR are applicable to the Proposed Stabilization Project and have been incorporated into the Proposed Stabilization Project's MMRP.

MM-HAZ-1: In order to minimize exposure, prior to demolition activities, asbestos-containing materials and lead-based paint surveys and evaluations shall be conducted in buildings that are to be demolished or renovated.

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

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

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

4.10 HYDROLOGY AND WATER QUALITY

4.10.1 Summary of Impacts Identified in the 2014 Master Plan 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 National Pollutant Discharge Elimination System (NPDES) Construction General Permit and Stormwater Pollution Prevention Plan (SWPPP) require measures regarding the handling of these types of materials and protocols for actions taken if a spill or release does occur (see Mitigation Measure MM-HYD-1). Therefore, impacts associated with these types of pollutants would be less than significant with mitigation incorporated.

Once the Approved Project is 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. The medical center would continue to adhere to all applicable regulations.

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 Approved Project would also comply with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous materials to reduce the potential for a release of contaminants into the groundwater as a result of project construction. Thus, construction activities would not degrade groundwater quality or interfere with recharge. Water use may temporarily increase to a limited extent during the construction phase. Therefore, construction-phase impacts would be less than significant.

Water use would increase during Approved Project operation because of the increase in the number of persons who would use the LAC+USC Medical Center Campus facilities and the increase in landscape maintenance. Although the Approved Project would increase indoor water demand at the site, it would not lead to a significant increase in the demand for potable water for indoor use in the region. The project would increase use of potable water and groundwater for irrigation. By incorporating reclaimed water, gray water, and harvested rainwater for irrigation, the increased demand for groundwater for irrigation could be reduced. For these reasons, water demand associated with the Approved Project would not deplete groundwater supplies substantially. The project would increase groundwater recharge (see the

hydrology memorandum in Appendix F of the 2014 Master Plan EIR) and would not interfere substantially with recharge. Therefore, the impacts on groundwater supplies or recharge during operation would be less than significant. Additionally, to further reduce potential impacts, irrigation water demand above existing irrigation demands would be met by alternative supply sources to the maximum extent possible as included in Mitigation Measure MM HYD-3. Implementation of Mitigation Measure 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.

The Approved Project would not substantially alter the existing drainage pattern of the LAC+USC Medical Center 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 Approved 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 Approved Project would use drought-tolerant and California native plants within pervious areas of the LAC+USC Medical Center Campus. Additionally, proposed stormwater and LID features (i.e., bioretention and wetland/detention areas) would include vegetation. Although the proposed lawn areas would be limited in area, agricultural crops would be encouraged, and a green roof is proposed for use as an urban farm. The use of plant species with high to moderate water needs, according to Water Use Classifications of Landscape Species III, would be limited and restricted to similar water-use areas. Routine structural BMPs that could be used as part of the Approved Project 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 LAC+USC Medical Center Campus that could result in substantial erosion and siltation on- or off-site would be less than significant after implementation of Mitigation Measure MM-HYD-1 and BMPs to control erosion and sedimentation.

The rate or amount of surface runoff resulting from Approved Project construction activities would be similar to the amount under existing conditions. During construction, the pervious nature of the LAC+USC Medical Center Campus would not be significantly altered. As such, the Approved Project would not result in a substantial increase in the rate or amount of surface runoff or flooding on- or off-site. Impacts were less than significant. With the increased pervious (landscape) areas (increase from 5 percent pervious to 25 percent 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 Approved Project. As such, the Approved Project would not result in a substantial increase in the rate or amount of surface runoff or result in flooding on- or off-site. Impacts would be less than significant.

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

The LAC+USC Medical Center Campus is not in a potential inundation area resulting from a dam failure.

The LAC+USC Medical Center 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. No impact would occur during construction or operation.

4.10.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	LTS	No	No	No	**Yes**
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LTS	No	No	No	**Yes**
c) Substantially alter 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;	LTS	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	LTS	No	No	No	**Yes**
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; or	LTS	No	No	No	**Yes**
iv) impede or redirect flood flows?	LTS	No	No	No	**Yes**
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	LTS	No	No	No	**Yes**
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LTS	No	No	No	**Yes**

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. As with the Approved Project, the Proposed Stabilization Project's construction activities could increase the amount of sediment in sheet flow or runoff entering the storm drain system. However, like the Approved Project, the Proposed Stabilization Project would be required to obtain and comply with the Construction General Permit from the State Water Resources Control Board and associated NPDES requirements (including the development and implementation of a SWPPP) would ensure that construction activities would not degrade water quality. Furthermore, as with the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measure MM-HYD-1 to ensure compliance with the SWPPP and Construction General Permit. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts related to surface and groundwater quality would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. The Proposed Stabilization Project would not require extensive excavation; construction activities would

include regrading for the installation of subsurface utilities, circulation and accessibility network improvements, and remediation. Because the Proposed Stabilization Project does not require excavation below normal or seasonally high groundwater levels, seepage into the groundwater is not anticipated. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Nevertheless, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measure MM-HYD-2 to ensure impacts are reduced to a less-than-significant level. The Proposed Stabilization Project's water use may temporarily increase to a limited extent during the construction phase; however, because the Proposed Stabilization Project's construction activities are within the scope analyzed in the 2014 Master Plan EIR, the Proposed Stabilization Project's construction-related water use were accounted for in the 2014 Master Plan EIR. Impacts related to groundwater supply would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational impacts related to groundwater supply would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

c) Substantially alter 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; or

iv) impede or redirect flood flows?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As previously discussed, the Proposed Stabilization Project is within the boundaries identified for impact in the 2014 Master Plan EIR. As with the Approved Project, grading activities associated with the Proposed Stabilization Project could affect drainage on the Project Site; however, careful design would prevent substantial alterations to drainage patterns and/or erosion within the Project Site. Like the Approved Project, the Proposed Stabilization Project would not substantially alter the existing drainage pattern of the Project Site or result in substantial erosion or siltation on- or off-site. Standard construction-phase best management practices would decrease the potential for any significant erosion or sedimentation from soil disturbance associated with construction of the Proposed Stabilization Project. Additionally, like the Approved Project, standard construction practices related to erosion and sediment control would be required as part of the permitting process. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Moreover, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measure MM-HYD-1 to ensure impacts would be less than significant. Impacts would continue to be less than significant with implementation of mitigation measures.

The 2014 Master Plan EIR determined that under the Approved Project, grading would occur throughout the LAC+USC Medical Center Campus, including the Project Site. The Proposed Stabilization Project's construction activities are within the impact boundaries identified for the Approved Project analyzed in the 2014 Master Plan EIR. As with the Approved Project, the Proposed Stabilization Project's construction activities would not alter the overall topography of the Project Site. Thus, the Proposed Stabilization Project would not result in a substantial increase in the rate or amount of surface runoff or flooding on- or off-site. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts related to surface runoff and flooding would continue to be less than significant.

As with the Approved Project, the peak flow rates and runoff volumes during construction would be less than existing conditions because the LAC+USC Medical Center Campus, including the Project Site, is approximately 95 percent impervious. The amount of impervious cover would not increase during construction, and at various stages of construction would be less than existing conditions. Impacts from runoff on stormwater drainage systems would continue to be less than significant.

According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Map, the LAC+USC Medical Center Campus, including the Project Site, is in an area of minimal flood

hazard (FEMA 2008). Therefore, the Proposed Stabilization Project would not impede or redirect flood flows. No impacts on flood flows would continue to occur.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts on runoff and flooding would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As stated in the 2014 Master Plan EIR, the LAC+USC Medical Center Campus, including the Project Site, is not within a potential inundation area from a dam failure. Additionally, the LAC+USC Medical Center Campus, including the Project Site, is approximately 19 miles inland from the Pacific Ocean. The Proposed Stabilization Project would occur within the boundaries identified in the 2014 Master Plan EIR and includes no new development on or off-site. Therefore, as with the Approved Project, the Proposed Stabilization Project would not risk release of pollution due to flood hazard, tsunami, or seiche zones and would continue to result in no impacts related to inundation.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Proposed Stabilization Project would occur within the boundaries identified in the 2014 Master Plan EIR and includes no new development on or off-site. As with the Approved Project, the proposed Project would not directly affect groundwater resources, make indirect demands on local groundwater supplies, or interfere with a sustainable groundwater management plan.

As with the Approved Project, the Proposed Stabilization Project's construction activities would be required to adhere to the NPDES Construction General Permit to control erosion and protect water quality. Additionally, the Proposed Stabilization Project would be required to adhere to the County's requirements and guidelines pertaining to on-site drainage flow requirements. Thus, the Proposed Stabilization Project would not create or contribute runoff that would exceed the capacity of drainage systems or provide substantial additional sources of polluted runoff. Like the Approved Project, there are no other methods by which water quality could be degraded as a result of construction on the Project Site. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. The Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measures MM-HYD-1, MM-HYD-2, and MM-HYD-5 to reduce impacts to a less than significant level. Impacts would continue to be less than significant with implementation of these measures.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts related to the implementation of a water quality control plan would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.10.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measures MM-HYD-1, MM-HYD-2, and MM-HYD-5 EIR from the 2014 Master Plan EIR are applicable to the Proposed Stabilization Project and have been incorporated into the Proposed Stabilization Project's MMRP. Mitigation Measures MM-HYD-3, MM-HYD-4, and MM-

HYD-6 are not applicable to the Proposed Stabilization Project's construction activities, which are not anticipated to result in groundwater seepage; irrigation water demand; or the construction of development.

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

4.11 LAND USE AND PLANNING

4.11.1 Summary of Impacts Identified in the 2014 Master Plan EIR

Projects under the Approved Project could include development of new or renovation of existing office space for medical uses, retail space, open space, parking facilities, and possibly some workforce housing on the medical center campus. Although construction activities on the LAC+USC Medical Center Campus could result in off-site impacts, all proposed development and facilities under the Approved Project would be constructed within the existing boundaries of the LAC+USC Medical Center 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 would be less than significant. During operation, proposed facilities were medically related in nature and were generally compatible with existing uses on the campus and in the surrounding area. Additionally, proposed retail services and medically related services and open spaces would benefit the surrounding community, especially nearby residential neighborhoods. As noted above, proposed new development and facilities would be limited to the existing boundaries of the medical center campus. No surrounding residential neighborhoods would be divided, and no off-site residential buildings would be displaced as a result of implementation of the Approved Project. Therefore, no significant impacts would occur during operation.

Buildout of the Approved Project would result in significant impacts to historical resources and traffic and consequently would conflict with the relevant goals of the Northeast Community Plan (see Table 3.9-1 in the 2014 Master Plan EIR). Nonetheless, given the Approved Project would be consistent with most local land use plan policies and because the LAC+USC Medical Center Campus is not subject to the City of Los Angeles' land use regulations, the Approved Project would not result in a significant land use impact due to conflicts with applicable land use plans, policies, or regulations.

The Approved Project would not conflict with any applicable habitat conservation plan or natural community conservation plan, and no further discussion was warranted in the 2014 Master Plan EIR.

4.11.2 Impacts Associated with the Proposed Stabilization Project

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Physically divide an established community?	LTS	No	No	No	**Yes**
b) Cause 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?	LTS	No	No	No	**Yes**

a) Physically divide an established community?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. The Proposed Stabilization Project includes seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommission and demolition of the WCP. No new development or changes to land use are proposed. General construction activities analyzed in the 2014 Master Plan EIR included the demolition of several structures, including the old utility (WCP) and maintenance facility, OPD building, IRD building, Parking Structure 10 and 12, several modular buildings, and storage and

warehouse buildings. The Proposed Stabilization Project would be consistent with current uses on-site and would remain within the bounds of the LAC+USC Medical Center Campus. No changes are proposed that would result in the demolition of residential uses in the LAC+USC Medical Center Campus or surrounding neighborhood that would divide an established neighborhood. The Proposed Stabilization Project uses are consistent with surrounding uses. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Cause 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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. As previously discussed, the Project Site is a County-owned property; therefore, the Proposed Stabilization Project would require approval by the County Board of Supervisors and is not subject to regulation by the City's General Plan or Zoning Code. However, as with the Approved Project, any off-site improvements required to mitigate Proposed Stabilization Project impacts would be subject to City regulations. Additionally, as with the Approved Project, although the Project Site is not subject to City zoning, the Proposed Stabilization Project would ensure that the Proposed Stabilization Project's improvements would be in alignment with regional and local planning objects to maintain compatibility with adjacent communities.

General construction activities analyzed in the 2014 Master Plan EIR included the demolition of several structures, including the old utility (WCP) and maintenance facility, OPD building, interns and residents building, Parking Structure 10 and 12, several modular buildings, and storage and warehouse buildings. Additionally, excavation and grading activities were assumed to be needed to implement the Approved Project. The Proposed Stabilization Project would include a seismic

retrofit of the General Hospital, which would comply with Secretary of Interior Standards under the supervision of a qualified professional, to ensure the preservation of the historic features of the General Hospital Building. Construction activities associated with the seismic retrofit would be temporary in nature and would not alter the exterior physical appearance of the General Hospital Building, consistent with what was described in the 2014 Master Plan EIR. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not alter the existing operation of the General Hospital. Similar to the Approved Project, the Proposed Stabilization Project would be consistent with most local land use plan policies and would not result in a significant land use impact due to conflicts with applicable land use plans, policies, or regulations. Implementation of the Proposed Stabilization Project would be consistent with existing uses and the Approved Project uses identified in the 2014 Master Plan EIR. Impacts related to land use regulations would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.11.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

No mitigation measures related to land use and planner were outlined in the 2014 Master Plan EIR, and no new mitigation measures would be required for the Proposed Stabilization Project.

4.12 MINERAL RESOURCES

4.12.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The LAC+USC Medical Center Campus is not within the administrative boundaries of an oil field. One active oil well, however, is near the south end of the LAC+USC Medical Center Campus along Marengo Street. The LAC+USC Medical Center Campus is not identified as a locally important mineral resource discovery site in local plans, including the conservation element of the County general plan, specific plan, or other land use plan. As a consequence, no adverse impacts to mineral resources are anticipated.

4.12.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

		Conditions Requiring Subsequent Review			
Would the project:	**Level of Impact in Certified EIR**	**Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	**Stabilization Project Meets the Conditions for an Addendum** *CEQA Guidelines Section 15164*
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	LTS	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
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?	LTS	No	No	No	**Yes**

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR determined that the LAC+USC Medical Center Campus does not contain known mineral resources of regional or state value. Since the stabilization components of the Proposed Stabilization project are within the LAC+USC Medical Center Campus, the Proposed Stabilization Project would not result in the loss of availability of a known mineral resource. The Project Site is currently developed and disturbed from prior development and is not used for mineral extraction, and no impact would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR determined that the Approved Project would not 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, because the LAC+USC Medical Center Campus contains no known mineral resources. Since the stabilization components of the Proposed Stabilization project are within the LAC+USC Medical Center Campus, the Proposed Stabilization Project would not 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, and no impacts on mineral resource recovery sites would occur.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.12.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

No mitigation measures related to mineral resources were outlined in the 2014 Master Plan EIR, and no new mitigation measures would be required for the Proposed Stabilization Project.

4.13 NOISE

4.13.1 Summary of Impacts Identified in the 2014 Master Plan EIR

Increased noise levels are anticipated to occur in the vicinity of Approved Project facilities during the construction phase. The LAC+USC Medical Center Campus is located in close proximity to sensitive receptors both on the site and in the immediate vicinity. The nearest noise-sensitive land uses consisted of medical uses on the campus itself. Residential uses and a school, the Bravo Medical Magnet High School, are located within one quarter mile of the LAC+USC Medical Center Campus. For construction of facilities that did not involve pile driving and were located toward the interior of the LAC+USC Medical Center Campus, the noise levels at off-site residential properties would be below the applicable Lmax threshold of 75 A-weighted decibels (dBA). However, for construction that involved pile driving and/or was close to the project boundaries in the vicinity of residences (such as homes across Marengo Street or on Sichel Street), maximum noise levels would exceed 75 dBA. In addition, construction of new on-site facilities would occur in close proximity to existing medical center

buildings that house patients and would exceed 85 dBA at these locations. These were significant impacts.

While Mitigation Measures MM-NOI-1 through MM-NOI-6 and adherence to applicable noise standards would reduce construction noise levels, it would not eliminate the predicted noise impacts entirely; therefore, construction noise impacts were considered significant and unavoidable.

Heavy construction equipment has the potential to produce groundborne vibration levels that would be 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 was not practical to avoid the operation of heavy construction equipment within 111 feet of these receptors; therefore the impact was significant. Mitigation Measures MM-NOI-6 would reduce construction vibration levels but would not eliminate the predicted impacts entirely; therefore, construction vibration impacts were considered significant and unavoidable.

Future on-campus buildings (excluding “buildings with few or no occupants or where occupants are not likely to be affected by exterior noise”) constructed within 129 feet of Marengo Street, 172 feet of Mission Road, 46 feet of Zonal Avenue, 590 feet of I-5, or 482 feet of I-10 would be exposed to a noise level of 65 dB CNEL or greater from traffic noise, and would be required to comply with the CALGreen exterior-to-interior noise control standards for non-residential construction. Failure of any non-residential on-site buildings to comply with these standards would be a significant impact.

The Approved Project also proposed to locate new residential buildings (workforce housing) on parcels adjacent to Mission Road; these buildings would be subject to the interior noise standard of 45 dB Ldn or CNEL established by the County’s Building Code. Compliance with these standards would ensure the noise impact on these residences would be less than significant.

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

Approved Project-generated traffic would increase traffic noise levels in the project vicinity by less than 3 dB CNEL adjacent to all roadways. Therefore, the traffic noise impact would be less than significant. New on-site mechanical equipment had the potential to produce a substantial

permanent increase in ambient noise levels at nearby off-site noise-sensitive receptors, which would be a significant impact. Other operation noise sources consisted of parking lot activity, emergency vehicles, and outdoor events. Neither parking lot activity nor emergency vehicles were expected to generate substantial permanent increases in ambient noise levels. Therefore, impacts from these sources would be less-than-significant.

The existing LAC+USC Medical Center Campus included two helipads for patient transportation. One helipad was on the roof top of the medical center building and one was on a flat area on the west portion of the campus. Typical flight operations were: a helicopter lands on the rooftop helipad, and 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 attending 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 were an average of approximately 27 landings per month.

Under the Approved Project, the at-grade helipad would be located to an as-yet 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 changes to the typical flight paths used by incoming helicopters. In addition, individual landings and on-site helicopter movements would be relatively short in duration. For these reasons, the long-term average noise levels generated by helicopters were expected to be low compared to other noise sources and were not expected to change significantly as a result of the project. Therefore, the noise impacts associated with the helipads would be less-than-significant.

4.13.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
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?	SU	No	No	No	**Yes**
b) Generation of excessive groundborne vibration or groundborne noise levels?	SU	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
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?	LTS	No	No	No	**Yes**

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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. As with the Approved Project's construction activities, the Proposed Stabilization Project's construction activities would take place between the hours of 7 a.m. to 7 p.m. Monday through Friday or 8 a.m. to 6 p.m. on Saturdays, in accordance with the County and City of Los Angeles government codes. If, during development of the final construction schedule, it is deemed necessary to work outside of the permitted hours, the County would follow the necessary procedures to obtain an appropriate variance. All equipment or machinery with internal combustion engines would be equipped with suitable exhaust and air intake silencers in proper working order. The Approved Project assumed construction activities would span 25 years; the Proposed Stabilization Project

would occur within the identified time frame for the Approved Project (2040). Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. As with the Approved Project, the Proposed Stabilization Project's construction activities would result in significant noise impacts requiring mitigation. The Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measure MM-NOI-1 to reduce construction-related noise impacts; however, impacts would remain significant and unavoidable.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions under the Approved Project as analyzed in the 2014 Master Plan EIR. Impacts related to ambient noise levels would continue to be less than significant. Nevertheless, although a location is unknown at this time, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measure MM-NOI-4 to reduce operational noise impacts due to the relocated WCP. As identified in the 2014 Master Plan EIR, the eventual location of the utility plant would be relocated to an area within the LAC+USC Medical Center Campus that would be less visible to the public, and as such would be at an appropriate distance from sensitive noise receptors.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR**.** As with the Approved Project, the Proposed Stabilization Project's construction activities have the potential to produce groundborne vibration. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed

those described in the 2014 Master Plan EIR. Therefore, as with the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measures MM-NOI-6 to reduce vibration levels; however, impacts related to groundborne vibration and noise would remain significant and unavoidable.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. As identified in the 2014 Master Plan EIR, the LAC+USC Medical Center Campus included two helipads for the transportation of patients to the emergency room by air ambulance. One helipad is on the rooftop of the medical center building and one is on grade on the western portion of the LAC+USC Medical Center Campus. The Proposed Stabilization Project would not include the relocation of the two helipads within the LAC+USC Medical Center Campus and would not result in an increase in the overall number of landings or impact the flight paths utilized by incoming helicopters. Individual landings and on-site helicopter movements would be relatively short in duration. Therefore, the long-term average noise levels generated by helicopters are anticipated to be low compared to other existing noise sources and are not anticipated to change significantly due to the Proposed Stabilization Project. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services

provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts related to aircraft noise would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.13.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measures MM-NOI-1, MM-NOI-4, and MM-NOI-6 from the 2014 Master Plan EIR are applicable to the Proposed Stabilization Project and have been incorporated into the Proposed Stabilization Project's MMRP. Mitigation Measures MM-NOI-2, MM-NOI-3, and MM-NOI-5, are not applicable to the Proposed Stabilization Project because the WCP is exempt from MM-NOI-2; the Proposed Stabilization Project does not include the construction of non-residential or residential structures; and the Proposed Stabilization Project does not propose outdoor use areas.

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

- Construction activities should be limited to between the hours of 7 a.m. to 7 p.m. on Monday through Friday or 8 a.m. to 6 p.m. on Saturdays, and should not occur at any time on Sundays or legal holidays. Construction personnel should not be permitted on the job site, and material or equipment deliveries and collections should not be permitted outside of these hours.
- To the fullest extent practicable, the quietest available type of construction equipment should be used. Newer equipment is generally quieter than older equipment. The use of electric powered equipment is typically quieter than diesel or gasoline powered equipment, and hydraulic powered equipment is typically quieter than pneumatic power.
- Where possible, impact pile driving should be replaced with other piling techniques, such as vibratory pile driving or drilled and poured-in-place piles.
- All mobile and fixed noise-producing equipment used on the proposed project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity.

- All construction equipment should be properly maintained. Poor maintenance of equipment typically causes excessive noise levels.
- All construction equipment, stationary and mobile, should be equipped with properly operating and maintained mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features that meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., arc welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment.
- All noisy equipment should be operated only when necessary, and should be switched off when not in use.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- To the extent practicable, temporary barriers should be employed around the Project Site and/or around noisy construction equipment. For barriers to be effective they should break the line-of site between the equipment and any noise-sensitive receiver. These barriers may be constructed as follows:
    - From commercially available acoustical panels lined with sound absorbing material (the sound absorptive faces of the panels should face the construction equipment).
    - From common construction materials such as plywood and lined with sound absorptive material (the sound absorptive material should face the construction equipment).
    - From acoustical blankets hung over or from a supporting frame. The blankets should provide a minimum sound transmission class (STC) rating of 28 and a minimum noise reduction coefficient (NRC) of 0.80 and should be firmly secured to the framework with the sound absorptive side of the blankets oriented towards the construction equipment. The blankets should be overlapped by at least 6 inches at seams and taped so that no gaps exist. The largest blankets available should be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier.

- Construction employees shall be trained in the proper operation and use of the equipment.
- Storage, staging, parking, and maintenance areas shall be located away from sensitive receptors. Where this is not possible, the storage of waste materials, earth, and other supplies should be positioned in a manner that will function as a noise barrier to the closest sensitive receivers.
- Stationary noise sources such as generators and compressors should be positioned as far away as possible from noise sensitive areas.
- Construction equipment shall be stored on the Project Site while in use. This will eliminate noise associated with repeated transportation of the equipment to and from the site.
- To the extent possible, haul roads should not be designated through noise-sensitive areas

MM-NOI-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-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.

4.14 POPULATION AND HOUSING

4.14.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The 2014 Master Plan EIR determined that impacts to population and housing would be less than significant. 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 Approved Project. The County has a large pool of construction labor from which to draw within commuting distance of the LAC+USC Medical Center Campus. 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 Approved Project development and improvement projects. Therefore, construction activities would not induce substantial population growth. Impacts would be less than significant.

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

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

As mentioned above, all development and facilities proposed under the Approved Project would be constructed within the existing boundaries of the LAC+USC Medical Center Campus. There are currently no permanent housing units on campus. Thus, no displacement of existing housing would occur as a result of anticipated development under the Approved Project.

4.14.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Induce 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)?	LTS	No	No	No	**Yes**
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	LTS	No	No	No	**Yes**

a) Induce 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)?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The stabilization components of the Proposed Stabilization project are fully within the boundaries identified for the Approved Project within the 2014 Master Plan EIR. The Proposed

Stabilization Project includes the demolition of hazards and structures, site remediation, infrastructure and accessibility improvements, and decommissioning and demolition of the WCP. General construction activities analyzed in the 2014 Master Plan EIR included the demolition of several structures, including the old utility (WCP) and maintenance facility, OPD building, interns and residents building, Parking Structure 10 and 12, several modular buildings, and storage and warehouse buildings. Additionally, excavation and grading activities were assumed to occur to implement the Approved Project. The Proposed Stabilization Project would be within the impact boundaries identified for the Approved Project analyzed in the 2014 Master Plan EIR. The Proposed Stabilization Project does not include construction of new or altered facilities to replace the demolished facilities, other than a temporary replacement for the WCP. The Proposed Stabilization Project would include a seismic retrofit of the General Hospital, which would comply with SOI Standards to ensure the preservation of the historic features of the General Hospital Building. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. The Proposed Stabilization Project would result in no impacts.

The Proposed Stabilization Project does not include the development of new facilities, homes, businesses, or infrastructure that would induce population growth. Patient, visitor, or employee populations on the Project Site are not anticipated to increase. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts related to population growth would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Proposed Stabilization Project does not include the demolition or removal of any housing. Implementation of the Proposed Stabilization Project would not result in the displacement of a substantial number of residential units or persons. Section 3, *Project Description*, provides specific details of the proposed buildings to be demolished. Therefore, no impacts on existing people or housing would occur that would necessitate the construction of replacement housing. Impacts would continue to be less than significant.

The seismic retrofit component of the Proposed Stabilization Project would result in the relocation of up to 800 employees at the campus. While no employees within General Hospital were assumed, the 2014 Master Plan EIR identified that the Approved Project would result in the relocation of up to 2,992 employees from the LAC+USC Medical Center Campus due to the demolition of buildings proposed under the Approved Project. Therefore, this change is within the scope of impacts in the 2014 Master Plan EIR. As previously discussed, not all the components of the Approved Project have been realized; therefore, the relocation of the employees at the General Hospital Building are well within the scope identified in the 2014 Master Plan EIR. Thus, impacts would be less than significant. Thus, impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.14.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

No mitigation measures related to population and housing were outlined in the 2014 Master Plan EIR, and no new mitigation measures would be required for the Proposed Stabilization Project.

4.15 PUBLIC SERVICES

4.15.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The 2014 Master Plan EIR determined that impacts to public services would be less than significant with mitigation incorporated. During construction, development of the Approved Project 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, a potentially significant impact. To ensure emergency access, traffic flow, and the

emergency responders' ability to maintain adequate response times and other performance objectives, Mitigation Measure MM-PS-1 would be implemented.

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

Proposed development under the 2014 Master Plan was generally consistent with current use(s) and not planned to occur outside the campus boundaries. As a result, the Approved Project would not require the construction of new or altered fire facilities at Station 2 or any of the stations in the area that serve the surrounding communities. As part of the standard project approval process, the County of Los Angeles Fire Department would review and approve all project plans to ensure compliance with applicable fire codes and standards including ingress/access requirements, thereby minimizing the risk of increased operational fire hazards. Though LAFD is the primary emergency responder to the LAC+USC Medical Center Campus, the plan check reviews will be done by the County of Los Angeles Fire Department's Engineering Section. Additionally, under the Approved Project, older vacant or underutilized buildings that pose an increased risk of fire hazard would be demolished. Additionally, the LAPD indicated that Approved Project development would not have a significant impact on police services in the Hollenbeck Area. As such, the Approved Project 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 would be less than significant.

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

During operation, the projected development that could occur under the Approved Project could result in an increase of 2,416 employees on the campus. Given the campus's proximity to the freeway network and transit facilities, it was 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 were 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 would be less than significant.

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

The Approved Project includes enhanced native grassland landscapes, lightly programmed terrain, and other developments intended to create accommodating open space for campus employees, patients, and visitors. It was unlikely that the proposed Master Plan would result in a significant increase in the use of and demand for local, off-campus park facilities. Thus, development under the 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 would be less than significant.

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

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

During operation, projected development under the Approved Project could result in an increase of 2,416 employees on the campus. Given the campus's proximity to the freeway network and transit facilities, it was 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 were 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 would be less than significant.

4.15.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Result in 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:					
Fire protection?	LTS	No	No	No	**Yes**
Police protection?	LTS	No	No	No	**Yes**
Schools?	LTS	No	No	No	**Yes**
Parks?	LTS	No	No	No	**Yes**

a) Result in 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:

Fire protection?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Project Site receives fire protection and paramedic services from the Los Angeles County Fire Department (LACFD). Services provided by LACFD include fire suppression, hazardous materials protection, emergency medical treatment, earthquake and fire safety planning, fire inspections, and building plan reviews. The Project Site would continue to be served by existing stations. The Proposed Stabilization Project includes the demolition of hazards and structures, site remediation, infrastructure and accessibility improvements, and decommissioning and demolition of the WCP within the West Campus. General construction activities analyzed in the 2014 Master Plan EIR included the demolition of several structures, including the old utility (WCP) and maintenance facility, OPD building, interns and residents building, Parking Structure 10 and 12, Women's and Children's Hospital Building, several modular buildings, and storage and warehouse buildings.

The Proposed Stabilization Project would be consistent with current uses on-site and would not planned outside the bounds of the LAC+USC Medical Center Campus. While demolition and construction activities may temporarily increase demand for fire protection services, it is unlikely that it would result in the need for new or altered fire protection facilities to provide fire protection services to the Project Site during demolition. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR.

Like the Approved Project, as part of the standard project approval process, the County of Los Angeles Fire Department would review and approve all project plans to ensure compliance with applicable fire codes and standards, including ingress/access requirements, thereby minimizing the risk of increased operational fire hazards. Additionally, the 2014 Master Plan EIR analyzed impacts related to the demolition of older vacant or underutilized buildings that pose an increased risk of fire hazard; therefore, the Proposed Stabilization Project is not expected to require construction of new or altered facilities to maintain acceptable service ratios, response times, or other public facility

performance objectives. Impacts related to the provision of fire services would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

Police protection?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. During demolition and construction activities, the Project Site would be protected by fencing, lighting, and security patrol. The Los Angeles County Sheriff's Department (LASD) is already responsible for patrolling existing structures on the LAC+USC Medical Center Campus. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Thus, while demolition and remediation activities could temporarily increase the demand for police protection services, it is unlikely that it would result in the need for new or altered LASD facilities to maintain acceptable performance objectives.

During demolition, emergency access to the Project Site could be affected by temporary lane closures to accommodate demolition activities and demolition related-traffic could delay or obstruct the movement of emergency vehicles, a potentially significant impact. In order to ensure emergency access, traffic flow, and the LASD and LAPD's ability to maintain adequate response times and other performance objectives, Mitigation Measure MM-PS-1 from the 2014 Master Plan EIR would be incorporated into the Proposed Stabilization Project.

The Proposed Stabilization Project does not include new facilities or uses that would increase the number of employees or visitors. As such, increased police presence and

protection is not expected to occur. Impacts related to the provision of police services would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

Schools?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As described in Section 4.14, *Population and Housing*, the Proposed Stabilization Project would not directly or indirectly result in new population growth. The Proposed Stabilization Project does not include the construction of new facilities or uses that would increase the number of employees that may relocate to the area, thereby increasing local school enrollment. Additionally, given the large pool of construction workers within commuting distance of the Project Site, it is unlikely that construction workers would choose to permanently relocate their households to the area. As such, impacts related to the provision of schools would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

Thus, The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

Parks?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The nearest park to the Project Site is the Hazard Recreation Center, approximately 0.2 mile east of the Project Site. The Proposed Stabilization Project would not have an adverse physical impact on any parks or necessitate the construction of new parks since there would be no operational changes onsite. The Proposed Stabilization Project does not include new facilities or uses that would increase the number of employees that may relocate to the area, thereby increasing local park use. Additionally, given the large pool of construction workers within commuting distance of the Project Site, it is unlikely that construction workers would choose to permanently relocate their households to the area. Impacts related to the provision of parks would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

Thus, the Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

Other public facilities?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Proposed Stabilization Project would not result in impacts associated with the provision of other new or physically altered public facilities such as, libraries, childcare, teen, or senior centers. The Proposed Stabilization Project does not include new facilities or uses that would increase the number of employees that may relocate to the area, thereby increasing local public facilities use. Additionally, given the large pool of construction workers within commuting distance of the Project Site, it is unlikely that construction workers would choose to permanently relocate their households to the area.

The Proposed Stabilization Project would not substantially induce population growth; thus the existing public facilities would continue to be able to accommodate the Proposed Stabilization Project. As such, impacts related to the provision of other public facilities would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.15.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measure MM-PS-1 from the 2014 Master Plan EIR is applicable to the Proposed Stabilization Project and has been incorporated into the Proposed Stabilization Project's MMRP.

4.16 RECREATION

4.16.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The 2014 Master Plan EIR determined that impacts to recreation would be less than significant. The Approved Project 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 Approved Project included 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 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 would most likely be dispersed over a wide geographic area within commuting distance of the campus; therefore, a concentrated or substantially intensified use of local parks was unlikely. Impacts would be less than significant.

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

During project operations, it was 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 applicable mitigation measures would mitigate some of this impact related to noise. Demand for recreational facilities during project operations was not expected to significantly increase due to additional employees being dispersed over a wide geographic area.

4.16.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	**Level of Impact in Certified EIR**	**Conditions Requiring Subsequent Review**			**Stabilization Project Meets the Conditions for an Addendum** *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LTS	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	SU	No	No	No	**Yes**

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Project Site is in a developed and urbanized community, developed with medical uses, and does not currently operate as a park. The Proposed Stabilization Project would consist of a seismic retrofit of the General Hospital and improvements within the West Campus, including demolition of hazards and structures, site remediation, infrastructure and accessibility improvements, and decommissioning and demolition of the WCP. The Proposed Stabilization Project does not include development of any new uses. As described in Section 4.14, *Population and Housing*, the Proposed Stabilization Project would not directly or indirectly result in new population growth. Patient, visitor, or employee populations on the Project Site are not anticipated to increase. Thus, the Proposed Stabilization Project would not result in the need for new or expanded park facilities nearby, and impacts related to the use of nearby recreational facilities would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed

Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Proposed Stabilization Project does not include the construction of new recreational facilities. No new development is proposed that would result in increased patient, visitor, or employee populations that would necessitate the construction or expansion of new recreational facilities. Impacts related to the construction of recreational facilities would be less than significant. Although the Proposed Stabilization Project would result in less than significant impacts, the Proposed Stabilization Project would not reduce the Approved Project's significant and unavoidable impacts. Impacts would remain significant and unavoidable.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.16.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measures MM-AQ-2, MM-AQ-3, MM-NOI-1, MM-NOI-4, and MM-NOI-6 from the 2014 Master Plan EIR are applicable to the Proposed Stabilization Project and have been incorporated into the Proposed Stabilization Project's MMRP.

4.17 TRANSPORTATION

4.17.1 Summary of Impacts Identified in the 2014 Master Plan EIR

Construction of facilities under the Approved Project 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 would not be known until individual development projects were proposed and project plans were developed.

Under MM-TRAF-1, construction traffic control measures would be developed and implemented and would reduce construction impacts related to conflicts with applicable plans, ordinances, or policies to less than significant.

During project operations, the facilities proposed under the Approved Project would result in significant impacts on four intersections under existing baseline plus project conditions:

- Daly Street and Main Street (PM)
- State Street and Cesar E. Chavez Avenue (PM)
- State Street and Marengo Street (AM and PM)
- Soto Street and Marengo Street (AM)

Implementation of Mitigation Measures MM-TRAF-2 and MM-TRAF-3 would reduce significant impacts at the State Street/Marengo Street to a less-than-significant level.

However, Mitigation Measure MM-TRAF-2 is subject to Los Angeles Department of Transportation's (LADOT's) acceptance and approval. If LADOT determines that one or more of the proposed improvements are not feasible, the impact at intersection 13 (State Street and Marengo Street) would remain significant and unavoidable.

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

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 Approved Project 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.

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

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

During operation, no significant impacts on the transit system were anticipated. Given the frequency and density of existing bus transit service in proximity to the LAC+USC Medical Center Campus, the incremental increase in the number of transit riders (on average, three or fewer passengers per bus) resulting from the project were anticipated to result in a less-than-significant impact on the transit lines that serve the area. Furthermore, implementation of the Approved Project would support buildout of the local and regional bicycle network.

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

4.17.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	SU	No	No	No	**Yes**
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision(b)?	N/A	No	No	No	**Yes**
c) Substantial increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LTS/M	No	No	No	**Yes**
d) Result in inadequate emergency access?	LTS/M	No	No	No	**Yes**

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Proposed Stabilization Project Meets the Conditions of the CEQA Guidelines Section 15164. The Proposed Stabilization Project is a construction effort that includes four components consisting of a seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommissioning and demolition of the WCP, are within the impact boundaries identified for the Approved Project. As previously discussed, the activities associated with the proposed seismic retrofit and demolition of two additional buildings (General Laboratory and Mason Shop), were not analyzed in the 2014 Master Plan EIR.

As with the Approved Project, the Proposed Stabilization Project would involve intermittent lane and sidewalk closures during construction. The Proposed Stabilization Project's circulation/access component is intended to improve the pedestrian circulation and safety within the Project Site and overall LAC+USC Medical Center Campus following demolition of structures. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. The Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measure MM-TRAF-1 to minimize and reduce construction traffic impacts. Like the Approved Project, the Proposed Stabilization Project would continue to result in less than significant impacts related to transportation programs.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. The Proposed Stabilization Project would improve circulation and accessibility within the Project Site and overall LAC+USC Medical Center Campus. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts to circulation would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Proposed Stabilization Project Meets the Conditions of the CEQA Guidelines Section 15164. The Natural Resources Agency revised Appendix G of the CEQA Guidelines to include a checklist item related to vehicle miles traveled (VMT) in December 2018 (effective January 2019). The

2014 Master Plan EIR was certified before the VMT checklist topic was added to the CEQA Guidelines and therefore does not include a discussion related to VMT.

The Proposed Stabilization Project includes four stabilization components consisting of a seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommissioning and demolition of the West Central Plant, which are within the impact boundaries identified for the Approved Project. As previously discussed, the construction activities associated with the proposed seismic retrofit and demolition of two additional buildings (General Laboratory and Mason Shop), were not analyzed in the 2014 Master Plan EIR. The 2014 Master Plan EIR determined that construction of various element identified in the Approved Project, including the Proposed Stabilization Project's components, would result in temporary increases in traffic volumes due to construction-generated traffic. The Proposed Stabilization would occur within the 25-year life cycle of the Approved Project (through 2040). Additionally, the majority of the Approved Project has not been realized to date. Therefore, construction-related trips for the Proposed Stabilization Project would fall within the scope of impacts and were already accounted for in the 2014 Master Plan EIR. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts from construction-related trips on VMT would be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. No new development is proposed that would change the existing VMT associated with the remaining operational hospital facilities. The Proposed Stabilization Project would improve circulation and accessibility within the Project Site and overall LAC+USC Medical Center Campus. According to the major transit stops on the Los Angeles County map, the LAC+USC Medical Center, including the Project Site, is within a half mile of a major transit stop (Metro 2025). Thus, operational impacts on VMT would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Proposed Stabilization Project Meets the Conditions of the CEQA Guidelines Section 15164. As with the Approved Project, the Proposed Stabilization Project's 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. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Therefore, like the Approved Project, the Proposed Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measure MM-TRAF-1 to reduce any impacts related to traffic to a less than significant level. Impacts related to hazards from design features and uses would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. The Proposed Stabilization Project would improve circulation and accessibility within the Project Site and overall LAC+USC Medical Center Campus. Operational impacts related to transportation safety hazards would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

d) Result in inadequate emergency access?

Proposed Stabilization Project Meets the Conditions of the CEQA Guidelines Section 15164. The Proposed Stabilization Project is a construction effort that includes four components consisting of a seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommissioning and demolition of the WCP, are within the impact boundaries identified for the Approved Project. As previously discussed, the activities associated with the proposed seismic retrofit and demolition of two additional buildings (General Laboratory and Mason Shop), were not analyzed in the 2014 Master Plan EIR. As with the Approved Project, the Proposed Stabilization Project's construction activities could require temporary road or lane closure, which could result in a decrease in roadway capacity. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Therefore, like the Approved Project, the Proposed

Stabilization Project would incorporate 2014 Master Plan EIR Mitigation Measure MM-TRAF-1, and impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions anticipated under the Approved Project and analyzed in the 2014 Master Plan EIR. The Proposed Stabilization Project would improve circulation and accessibility within the Project Site and overall LAC+USC Medical Center Campus. Impacts related to emergency access would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR Mitigation Measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.17.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measure MM-TRAF-1 from the 2014 Master Plan EIR is applicable to the Proposed Stabilization Project and has been incorporated into the Proposed Stabilization Project's MMRP. Mitigation Measures MM-TRAF-2 and MM-TRAF-3 are not applicable to the Proposed Stabilization Project because these mitigation measures have already been implemented.

> **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.

4.18 TRIBAL CULTURAL RESOURCES

4.18.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The requirement to evaluate impacts to tribal cultural resources in CEQA documents was implemented subsequent to completion of the 2014 Master Plan EIR. Assembly Bill (AB) 52 went into effect on July 1, 2015, and applies to projects for which a Notice of Preparation (NOP) 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 project if: (1) the tribe requested 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 Master Plan EIR was published May 19, 2014, and therefore, the lead agency was not required to comply with the requirements of AB 52. The Native American ethnographic setting of the project area was addressed in the Cultural Resources section of the 2014 Master Plan EIR. No tribal cultural resources were identified as being present in the immediate vicinity (0.25 miles) of the LAC+USC Medical Center Campus.

4.18.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	**Level of Impact in Certified EIR**	**Conditions Requiring Subsequent Review**			**Stabilization Project Meets the Conditions for an Addendum** *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:		No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
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	N/A	No	No	No	**Yes**
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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.?	N/A	No	No	No	**Yes**

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. Public Resources Code Section 21080.3.1(b) requires the lead agency to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the project prior to the release of negative declaration, mitigated negative declaration, or environmental impact report for a project. This requirement applies to all projects on or after July 1, 2015. Because this is an Addendum to the 2014 Master Plan EIR, the notification and consultation for tribal cultural resources (TCR) requirements pursuant to Public Resources Code, Section 21080.3.1, do not apply to the Proposed Stabilization Project, and no tribal consultation was required or performed.

General construction activities analyzed in the 2014 Master Plan EIR included the demolition of several structures, including the old utility (WCP) and maintenance facility, OPD building, interns and residents building, Parking Structure 10 and 12, Women's and Children's Hospital Building, several modular buildings, and storage and warehouse buildings. Additionally, excavation and grading activities were assumed to implement the Approved Project. The Proposed Stabilization Project would be within the impact boundaries identified for the Approved Project analyzed in the 2014 Master Plan EIR. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR.

The 2014 Master Plan EIR did not separately analyze tribal cultural resources, but the Native American ethnographic setting of the project area was addressed in the Cultural Resources section of the 2014 Master Plan EIR. No impacts on archaeological resources were anticipated within the LAC+USC Medical Center Campus, as surface disturbances over the past 130 years have most likely destroyed any archaeological resources. Therefore, there is a low likelihood of encountering prehistoric or historical archaeological resources. There are no known tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources. Nonetheless, the possibility remains that structural demolition, grading, and excavation could affect unknown buried archeological resources. The 2014 Master Plan EIR concluded that with implementation of Mitigation Measures MM-CR-8 and MM-CR-9, impacts to these resources would be less than significant. As required by the mitigation, should archaeological resources (sites, features, or artifacts) be exposed during construction and demolition activities for the Proposed Stabilization Project, all construction work within 100 feet

of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted.

Additionally, the Proposed Stabilization Project would be required to comply with the National Historic Preservation Act, American Indian Religious Freedom Act, Native American Graves and Repatriation Act, and the California Health and Safety Code, which generally require that any ground disturbance must cease in the event of accidental discovery of resources or disturbance to human remains during construction activities. In the event of accidental discovery of human remains, California Health and Safety Code Section 7050.5 and CEQA Guidelines Section 15064.5 require that there be no further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent human remains. These regulations require the County Coroner to be contacted and to make a determination as to whether an investigation into the cause of death is required and whether the remains are Native American. If the remains are determined to be Native American, the Coroner shall contact, by telephone within 24 hours, the Native American Heritage Commission. The NAHC shall identify the person(s) it believes to be the most likely descendent, and the most likely descendent may make recommendations regarding proper treatment and burial, which would be implemented in accordance with Section 15064.5I of the CEQA Guidelines.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As stated in Section 4.18.a.i, the notification and consultation requirements pursuant to Public Resources Code, Section 21080.3.1, do not apply to an Addendum. The Proposed Stabilization Project would not adversely impact any of the resources criteria outlined in Public Resources Code Section 5024.1. Moreover, the Proposed Stabilization Project would be within the impact boundaries identified for the Approved Project analyzed in the 2014 Master Plan EIR. The Proposed Stabilization Project does not include impacts off-site. Impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Applicable 2014 Master Plan EIR mitigation measures would be incorporated to reduce impacts. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.18.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measures MM-CR-8 and MM-CR-10 from the 2014 Master Plan EIR are applicable to the Proposed Stabilization Project and have been incorporated into the Proposed Stabilization Project's MMRP.

4.19 UTILITIES AND SERVICE SYSTEMS

4.19.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The Approved Project would introduce new multi-story structures onto the LAC+USC Medical Center Campus, which would increase wastewater usage compared to existing conditions. The LAC+USC Medical Center Campus is in an urban area that is currently served by wastewater infrastructure. During construction of individual projects implemented under the Approved Project, wastewater would be generated by construction workers. Implementation of the Approved Project could result in a net increase of 173,382 gallons per day of wastewater, which represents less than 0.06 percent of the average daily flows in the Hyperion Sewer System. The amount would be substantially less than the 501,393 gallons per day of wastewater generated by existing uses on the campus and would not exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board or the capacities of the local sewer lines and wastewater treatment facilities that serve the LAC+USC Medical Center Campus. Wastewater generated by future campus uses would be conveyed via sewer lines to the Hyperion Treatment Plant for treatment to full secondary standards. The treated wastewater, which is discharged via a five-mile ocean outfall into Santa Monica Bay, is subject to State waste discharge requirements and federal NPDES permit requirements. Therefore, the Approved Project would not generate wastewater that would exceed Los Angeles RWQCB's wastewater treatment requirements. Therefore, construction and operation impacts related to wastewater treatment requirements would be less than significant.

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

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

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

Proposed development under the Approved Project would increase the consumption of various utilities, including water and natural gas. The Los Angeles Department of Water and Power's Urban Water Management Plan identified future water supply and demand in their service area through the year 2035. Therefore, it was not known whether future water supplies beyond the year 2035 would be sufficient to meet the needs of projects constructed far after 2035. Therefore future water supply impacts, beyond the year 2035, were considered significant and unavoidable. Similarly, SoCalGas forecasts of future natural gas supplies and demand extended to the year 2030. If insufficient supplies existed for Approved Project development beyond the year 2030, the impact would be significant and unavoidable.

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

The threshold related to inefficient, wasteful, or unnecessary consumption of energy was added to the CEQA checklist after approval of the 2014 Master Plan EIR and therefore was not

evaluated; however, given proposed construction BMPs and implementation of building measures to conserve resources, development of project facilities and improvements were not expected to result in the wasteful or inefficient consumption of energy.

4.19.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Require or result 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?	LTS	No	No	No	**Yes**
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	SU	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
c) Result 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?	SU	No	No	No	**Yes**
d) Generate 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?	LTS	No	No	No	**Yes**
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	LTS	No	No	No	**Yes**

a) Require or result 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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. Following is a discussion of the Proposed Stabilization Project's potential impacts on water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunication facilities. The Proposed Stabilization Project includes four components—a seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommissioning and demolition of the WCP, which are within the impact boundaries identified for the Approved Project. The Proposed Stabilization Project does not include the addition of new facilities or operational uses that would increase demand for water supplies to the Project Site.

Water

The Proposed Stabilization Project would use water for various construction-related activities, and construction workers would consume water and generate wastewater. The incremental increase in water consumption during construction would not be permanent. Additionally, the 2014 Master Plan EIR determined that the additional water used by construction activities for the Approved Project would be substantially less than existing water consumption on the LAC+USC Medical Center Campus. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts related to water facilities would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

Wastewater

The 2014 Master Plan EIR determined that incremental increases in wastewater generation due to on-site construction workers for development of the Approved Project would not result in new or expanded off-site water or wastewater treatment facilities. The Proposed Stabilization Project includes seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommission and demolition of the WCP, which, are within the impact boundaries identified for the Approved Project. As previously discussed, the activities associated with the proposed seismic retrofit and

demolition of two additional buildings (General Laboratory and Mason Shop), were not analyzed in the 2014 Master Plan EIR. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. As with the Approved Project, wastewater generated by the Proposed Stabilization Project would be treated by the City of Los Angeles Bureau of Sanitation at the Hyperion Treatment Plant, which would have adequate capacity to receive and treat wastewater generated by the Proposed Stabilization Project, Approved Project, and existing commitments. Impacts related to wastewater facilities would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

Stormwater Infrastructure

The Proposed Stabilization Project would include ground surface disruption during excavation, grading, and trenching that would create the potential for erosion. However, a SWPPP incorporating BMPs for erosion control would be prepared prior to the start of construction activities in accordance to NPDES permit requirements (see Section 4.10, *Hydrology and Water Quality*). Additionally, a conceptual grading plan and a proposed stormwater management system were developed for the Approved Project in accordance with Los Angeles County LID Standards. Grading for the Proposed Stabilization Project would be required to follow existing contours and direct stormwater runoff to the center of the West Campus. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Therefore, it is not expected that construction activities for the Proposed Stabilization Project would substantially increase stormwater runoff and require new or expanded off-campus stormwater facilities. Impacts related to stormwater facilities would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the

VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

Energy, Natural Gas, and Telecommunication

The WCP currently supplies power to the Juvenile Hall, Intern and Residents Building, Outpatient Department Building, Medical Examiner Building, and parts of the General Hospital. The WCP also provides central heating and chilled water to several buildings both on- and off-site, but struggles to meet the demand. Studies indicate the WCP is operationally inefficient—leakages in the steam system tunnels lose about 50 percent of the steam, and the plant is oversized for the current load. The proposed decommissioning and relocation of the WCP would optimize current utility operations.

Construction activities under the Proposed Stabilization Project would require the use of energy resources, including electricity, natural gas, and transportation fuels for construction worker vehicles and trucks hauling construction materials or debris. The additional energy consumption from construction activities would be limited in duration and finite. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Construction activities would not result in a permanent increase in demand for energy resources. Therefore, construction activities would not require additional energy capacity, and impacts would continue to be less than significant.

The Proposed Stabilization Project does not include the addition of new facilities or operational uses that would result in excess use of energy beyond current consumption. Additionally, the 2014 Master Plan EIR determined that with projected gas supply and consumption trends, it was likely that there would be sufficient supply to the LAC+USC Medical Center Campus beyond 2030, and impacts related to energy, natural gas, and telecommunication would be less than significant; however, implementing project developed beyond the year 2030 would result in significant impacts. Additionally, the Proposed Stabilization Project does not propose any expansion of current operation uses that would require additional telecommunication facilities. Impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would be less than significant. Although the Proposed Stabilization Project would result in less-than-significant impacts, the

Proposed Stabilization Project would not reduce the Approved Project's significant and unavoidable impacts.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Proposed Stabilization Project is a construction effort that includes four components consisting of a seismic retrofit of the General Hospital Building; demolition of select structures; modifications to site infrastructure, accessibility, and hazards; and decommissioning and demolition of the WCP, which are within the impact boundaries identified for the Approved Project. As previously discussed, the activities associated with the proposed seismic retrofit and demolition of two additional buildings (General Laboratory and Mason Shop), were not analyzed in the 2014 Master Plan EIR. The Proposed Stabilization Project's construction activities would not result in an increase demand for water supplies to the Project Site. Impacts would continue to be less than significant.

As described above, the Proposed Stabilization Project would use water for various construction-related activities, and construction workers would consume water. The incremental increase in water consumption during construction would not be permanent. Additionally, the 2014 Master Plan EIR determined that the additional water used by construction activities for the Approved Project is expected to be substantially less than existing water consumption on the LAC+USC Medical Center Campus at that time. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts related to water supply would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be significant if it is determined that water suppliers will not have sufficient supplies to meet future Approved Project's water demands. Impacts would remain significant and unavoidable.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

c) Result 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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Proposed Stabilization Project includes components that are within the impact boundaries identified for the Approved Project analyzed in the 2014 Master Plan EIR. The Proposed Stabilization Project does not include the addition of new facilities or operational uses that would result in excess generation of wastewater. The 2014 Master Plan EIR determined that incremental increases in wastewater generation due to on-site construction workers for development of the Approved Project would not result in new or expanded off-site water or wastewater treatment facilities. As with the Approved Project, wastewater generated by the Proposed Stabilization Project would be treated by the City of Los Angeles Bureau of Sanitation at the Hyperion Treatment Plant, which would have adequate capacity to receive and treat wastewater generated by the Proposed Stabilization Project, Approved Project, and existing commitments. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts related to wastewater treatment would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be significant and unavoidable.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

d) Generate 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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Proposed Stabilization Project would generate solid waste requiring disposal at local landfills during demolition, excavating, and grading activities. The Proposed Stabilization Project would be within the impact boundaries identified for the Approved Project analyzed in the 2014 Master Plan EIR. There are several major landfills in the Los Angeles metropolitan area that serve the Project Site. Major landfills receive more than 250,000 tons of solid waste per year. Demolition debris and solid waste generated by other construction activities would be finite and limited to the construction periods, and existing landfills have sufficient long-term permitted capacity to accommodate construction-generated solid waste. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment, intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts related to the generation of solid waste would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As with the Approved Project, the Proposed Stabilization Project's construction activities would be required to comply with applicable regulations related to solid waste. Specifically, the California Integrated Waste Management Act of 1989 (AB 939) primarily guides solid waste management in the state and emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. Similarly, AB 75 requires all state agencies and large state facilities to divert at least 50 percent of solid waste from landfills. Although the Proposed Stabilization Project would result in the demolition in two additional buildings (General Laboratory and Mason Shop) and seismic retrofit activities not analyzed in the 2014 Master Plan EIR, these activities would not result in new construction equipment,

intensity, or methods that would result in impacts that exceed those described in the 2014 Master Plan EIR. Impacts related to the regulation of solid waste would continue to be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would continue to be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.19.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

Mitigation Measure MM-UTL-1 is not applicable to the Proposed Stabilization Project because the Proposed Stabilization Project would not increase water demand on-site as no new development or change in land use is proposed. Mitigation Measure MM-UTL-2 is not applicable to the Proposed Stabilization Project because the Proposed Stabilization Project does not include the construction of new developments that could result in an increase in wastewater generation.

4.20 WILDFIRE

4.20.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The requirement to evaluate impacts related to wildfire in CEQA documents was implemented subsequent to completion of the 2014 Master Plan EIR. The topic of wildfire was not officially part of the CEQA Guidelines' Appendix G until January 1, 2019, when the Natural Resources Agency updated Appendix G of the CEQA Guidelines. The Notice of Preparation (NOP) for the 2014 Master Plan EIR was published May 19, 2014, and therefore, the lead agency was not required to analyze wildfire impacts. Therefore, the analysis of wildfire impact is new in this Addendum. It was determined that the Approved Project would not result in any impacts related to wildland fires. It should be noted that impacts related to fire hazards were addressed

in Hazards and Hazardous Materials and Utilities and Service Systems sections of the 2014 Master Plan EIR.

4.20.2 Impacts Associated with the Proposed Stabilization Project

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	N/A	No	No	No	**Yes**
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	N/A	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
c) Require 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?	N/A	No	No	No	**Yes**
d) Expose 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?	N/A	No	No	No	**Yes**

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. A State Responsibility Area (SRA) is an area where the California Department of Forestry and Fire Protection (CAL FIRE) is the primary emergency response agency responsible for fire suppression and prevention (CAL FIRE 2025a). The Project Site is not in an SRA and is not in an

area classified as a very high fire hazard severity zone (FHSZ) by CAL FIRE (Cal FIRE 2025b, 2009). The nearest land designated a very high FHSZ in a local responsibility area (LRA) is approximately one mile northeast of the Project Site (CAL FIRE 2009). The nearest land in an SRA and classified as a very high FHSZ is approximately 10 miles southeast of the Project Site (CAL FIRE 2025b).

The Proposed Stabilization Project is within the boundaries analyzed for the Approved Project in the 2014 Master Plan EIR. The emergency operation center (EOC) for the City is at 500 E Temple Street, approximately 1.5 miles southwest of the Project Site (EMD 2025). The Proposed Stabilization Project would not alter the current uses on-site and would not block any roads or evacuation routes. The Proposed Stabilization Project is not anticipated to substantially impair the City's adopted emergency response plan or emergency evacuation plan. Moreover, the Proposed Stabilization Project's west campus component would improve circulation and access to not only the Project Site, but the overall LAC+USC Medical Center Campus as well. Impacts related to emergency response plans would be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164*.* The Proposed Stabilization Project is within the boundaries analyzed for the Approved Project in the 2014 Master Plan EIR. The Project Site is not in proximity to steep slopes where high winds can exacerbate wildfire risks. The areas surrounding the Project Site are developed with medical uses associated with the LAC+USC Medical Center Campus, residential uses, and commercial uses in accordance with the Approved Project. The Proposed Stabilization Project would not change the current uses at the LAC+USC Medical Center Campus. Additionally, no wildlands exist within the immediate vicinity of the Project Site. It was determined in the NOP/IS prepared for the 2014 Master Plan EIR that no impacts would occur related to wildland fire. The Proposed Stabilization Project is not anticipated to exacerbate wildfire risks, thereby exposing project

occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts related to pollutant concentrations from wildfire would be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

c) Require 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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Proposed Stabilization Project is within the boundaries analyzed for the Approved Project in the 2014 Master Plan EIR. The Proposed Stabilization Project includes retrofitting the General Hospital to meet modern seismic safety standards, and the demolition of various buildings in West Campus. General construction activities analyzed in the 2014 Master Plan EIR included the demolition of several structures. Additionally, excavation and grading activities were assumed for implementation of the Approved Project. The Proposed Stabilization Project's construction activities would not result in new construction equipment, intensity or methods that would result in impacts that would exceed those identified in the 2014 Master Plan EIR. The Proposed Stabilization Project does not require the installation or maintenance of infrastructure including roads, fuel breaks, emergency water sources, power lines, or utilities that may exacerbate fire risk or ongoing impacts to the environment.

As with the Approved Project, the Proposed Stabilization Project would be served by the LADWP for electrical services and water services, and Southern California Gas Company for natural gas. The Proposed Stabilization Project would connect to the Approved Project's planned utility lines. Impacts related to infrastructure and fire risk would be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

d) Expose 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?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The 2014 Master Plan EIR identified the LAC+USC Medical Center Campus, including the Project Site, as not within a potential dam inundation area, tsunami inundation area, seiche zone, or landslide/mudslide hazard zone. Since the stabilization components of the Proposed Stabilization project are within the bounds of the LAC+USC Medical Center Campus, the Proposed Stabilization Project is not expected to be exposed to flooding or landslide hazards. The Project Site is fully developed, surrounded by development, and is not in proximity to steep slopes or natural drainage courses. The Proposed Stabilization Project is not anticipated to expose 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. Impacts related to runoff, slope instability, and drainage changes would be less than significant.

The Proposed Stabilization Project would not result in any new development or uses, nor alter the operational conditions analyzed in the 2014 Master Plan EIR. Operational conditions analyzed for the Approved Project would occur as anticipated. Additionally, the Proposed Stabilization Project would not alter the services provided by the VIP CMHC; operation of the VIP CMHC would continue as anticipated. Operational impacts would be less than significant.

The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a) of the CEQA Guidelines.

4.20.3 Adopted Mitigation Measures Applicable to the Proposed Stabilization Project

No mitigation measures related to wildfire were outlined in the 2014 Master Plan EIR, and no new mitigation measures would be required for the Proposed Stabilization Project.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

4.21.1 Summary of Impacts Identified in the 2014 Master Plan EIR

The 2014 Master Plan EIR determined that the Approved Project's construction could result in the removal of trees or other roosting sites for Western yellow bats; however, mitigation has been identified to reduce impacts to less than significant levels.

The 2014 Master Plan EIR determined that the Approved Project in conjunction with other past, present, and probable future projects have the potential to result in significant cumulative impacts after mitigation with respect to air quality, greenhouse gas emissions, noise, transportation, and utilities and service systems.

The 2014 Master Plan EIR determined that the Approved Project could result in air quality and noise impacts that could cause substantial adverse effects on human being and that these impacts would be significant after implementation of identified mitigation.

4.21.2 Impacts Associated with the Proposed Stabilization Project

Would the project:

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
a) Does the project have the potential to 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 of restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	SU	No	No	No	**Yes**

Would the project:	Level of Impact in Certified EIR	Conditions Requiring Subsequent Review			Stabilization Project Meets the Conditions for an Addendum *CEQA Guidelines Section 15164*
		Substantial Change in Project or Circumstances Involving New or More Severe Significant Effects *CEQA Guidelines Section 15162(a)(1–2)*	**New Information Showing New or More Severe Significant Effects** *CEQA Guidelines Section 15162(a)(3)(A–B)*	**New Mitigation or Alternative to Reduce Significant Effect Is Declined** *CEQA Guidelines Section 15162(a)(3)(C–D)*	
b) Does the project have impacts that are individually limited, but cumulative considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future project.)	SU	No	No	No	**Yes**
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	SU	No	No	No	**Yes**

a) Does the project have the potential to 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 of restrict the range of a rare or

endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. The Project Site is developed and has no sensitive biological resources. Nevertheless, all applicable mitigation measures identified in the 2014 Master Plan EIR to avoid and reduce impacts have been integrated into the Proposed Stabilization Project, and with these mitigation measures, the Proposed Stabilization Project would not substantially degrade the quality of the environment. The Proposed Stabilization Project would not significantly affect fish or wildlife habitat or species. Impacts would continue to be less than significant.

Additionally, with respect to cultural resources, all applicable mitigation measures identified in the 2014 Master Plan EIR to avoid and reduce impacts have been integrated into the Proposed Stabilization Project, and with these mitigation measures the Proposed Stabilization Project would not eliminate important examples of California history or prehistory. The Proposed Stabilization Project would help to preserve the historic resources within the Project Site. However, the Proposed Stabilization Project would not reduce the Approved Project's significant and unavoidable impacts. Impacts would remain significant and unavoidable.

Therefore, the Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

b) Does the project have impacts that are individually limited, but cumulative considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future project.)

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As discussed in the 2014 Master Plan EIR, cumulative impacts were previously evaluated and determined to be significant and unavoidable. The proposed seismic improvements to the General Hospital building would result in an improvement and protection of the historic resources and would be implemented in a way that meets the SOI Standards and retains/enhances the historic value of the building. The proposed activities would build upon previous protective and mothballing activities that are necessary for the continued maintenance and preservation of the building and that address long-term damage as a result of the 1994 Northridge Earthquake, which ultimately led to the closure of the hospital. Implementation of the Proposed Stabilization Project does not compel the implementation of any possible future projects currently being considered or assumed under the Approved Project. Construction of the Recuperative Care Facility (consistent with the 2017 Addendum as part of

the Approved Project) and construction on the former Women's and Children's Hospital Building site (consistent with the 2023 Addendum as part of the Approved Project) may occur concurrently with activities under the Stabilization Project. Additionally, while specific details are not finalized, the County is considering the expansion/relocation of onsite crypts, which may also occur concurrently. Mitigation defined in this Addendum would ensure reduction of any cumulative effects. While planning is proceeding on possible future projects, the scope and definition of those projects has not yet been determined, adequate funding has not yet been secured, and they will be subject to separate future CEQA review. These projects would be required to analyze cumulative impacts. The Proposed Stabilization Project is intended to result in a cumulative benefit to the campus. The Proposed Stabilization Project would not result in any new significant impact or more severe significant impacts. Nevertheless, the Proposed Stabilization Project would not reduce the Approved Project's significant cumulative impacts. Therefore, cumulative impacts would remain significant and unavoidable.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Proposed Stabilization Project Meets the Conditions of State CEQA Guidelines Section 15164. As demonstrated in this Addendum, the Proposed Stabilization Project is within the impact boundary identified for the Approved Project analyzed in the 2014 Master Plan EIR. Although the Proposed Stabilization Project includes a new construction component (seismic retrofit) and the demolition of two additional buildings not previously identified in the 2014 Master Plan EIR, the Proposed Stabilization Project's construction would not introduce new construction equipment, intensity, or methods that would substantially increase the significant impacts disclosed in the 2014 Master Plan EIR. Impacts would remain significant and unavoidable. The Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR or require new mitigation measures beyond those identified in the 2014 Master Plan EIR. Consequently, the Proposed Stabilization Project would not trigger the need for preparation of a subsequent or supplemental EIR under the criteria in Sections 15162(a) and 15163(a).

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5. FINDINGS

5.1 DISCUSSION

As previously discussed, under CEQA Guidelines Section 15164, an addendum to an EIR or MND may be prepared if only minor technical changes or additions are necessary or none of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR or MND have occurred.

The following restates the standards set forth in CEQA Guidelines Section 15162 as they relate to the Proposed Stabilization Project. The text that follows the provisions of the law relate to the Proposed Stabilization Project.

1. **No substantial changes are proposed in the project which would require major revisions of the previous EIR due to the involvement of new significant environmental effect or a substantial increase in the severity of previously identified significant effect.**

   The Proposed Stabilization Project consists of four stabilization components: 1) maintenance and seismic retrofit of the General Hospital Building; 2) demolition of hazards and structures on the West Campus; 3) modifications to site infrastructure, accessibility, and hazards on the West Campus; and 4) decommissioning and demolition of the West Central Plant and the relocation of operations of the VIP CMHC from the West Campus to Building A/B C/D at the Central Juvenile Hall campus. The Proposed Stabilization Project does not include a change in land use or additional development not previously analyzed in the 2014 Master Plan EIR or subsequent Addenda. The Proposed Stabilization Project includes construction-type activities not explicitly analyzed in the 2014 Master Plan EIR or subsequent Addenda. Specifically, the Proposed Stabilization Project's seismic retrofit of the General Hospital was not explicitly analyzed; however, the General Hospital is within the boundaries of the Project Site analyzed in the 2014 Master Plan EIR and the Proposed Stabilization Project's modifications to the General Hospital would not significantly impact the character defining features of the façade of the building or significantly impacts the areas of high historic value within the building as the proposed activities would only affect non-historic, internal features. Additionally, the Proposed Stabilization Project includes the demolition of two buildings not previously identified for demolition in the 2014 Master Plan EIR. However, the type of construction activities proposed are consistent with those assumed in the 2014 Master Plan EIR.

Although the relocation of operations of the VIP CMHC was not analyzed in 2014 Master Plan EIR, the relocation would not change the services provided by the VIP CMHC; the VIP CMHC would continue to operate as anticipated. The relocated operations and services would be compatible with the existing uses within the Central Juvenile Hall campus, which provides mental healthcare services to youths. Continuation of ongoing maintenance activities and minor interior improvements and renovation to Building A/B C/D associated with this relocation are limited in nature and would not result in impacts to the environment.

The Proposed Stabilization Project does not include substantial changes compared to the Approved Project as modified by the subsequent Addenda; implementation of the Proposed Stabilization Project would not require revisions to the 2014 Master Plan EIR. The analysis provided in Section 4, *Environmental Analysis*, illustrates that the Proposed Stabilization Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR.

2. **No substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the EIR due to the involvement of any new significant environmental effects or a substantial increase in the severity of previously identified effects.**

Substantial changes have not occurred with respect to the circumstances under which the Approved Project was undertaken that would require major revisions to the 2014 Master Plan EIR. The 2014 Master Plan EIR and subsequent Addenda evaluated improvements and new development proposed at the LAC+USC Medical Center Campus, which includes the Project Site. The 2017 and 2023 Addenda evaluated new development not previously included or analyzed in the 2014 Master Plan EIR. To date, none of the 2014 Approved Project components, apart from the demolition of the Women's and Children's Hospital Building, has been implemented and the implementation of the components for the 2017 and 2023 project are on-going. The Proposed Stabilization Project is a stabilization project that would help to implement the 2014 Master Plan and meet the objectives and goals of the 2014 Master Plan. Additionally, as acknowledged in the 1999 EIR and 2010 Reuse Plan, the County has previously determined the need to undertake seismic and other protective measures to ensure the longevity of the General Hospital Building.

Although the Proposed Stabilization Project would result in the relocation of operations of the VIP CMHC from the West Campus to Building A/B C/D at the Central Juvenile Hall campus, the relocation would not alter the services provided by the VIP CMHC. The services provided by the VIP CMHC would be consistent with the uses at the Central

Juvenal Hall campus. Continuation of ongoing maintenance activities and minor interior improvements and renovation to Building A/B C/D associated with this relocation are limited in nature and would not result in impacts to the environment.

The Proposed Stabilization Project does not include the development of new structures, propose a change in land use, or propose any off-site improvements. The stabilization components of Proposed Stabilization Project would occur within the impact boundaries identified in the 2014 Master Plan EIR. Therefore, no proposed changes or revisions to the 2014 Master Plan EIR are required.

3. **No 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 EIR was certified shows any of the following:**
   i. **The project will have one or more significant effect not discussed in the previous EIR.**

      As acknowledged in the 1999 EIR and 2010 Reuse Plan, the County has previously determined the need to undertake seismic and other protective measures to ensure the longevity of the General Hospital Building. The stabilization components of the Proposed Stabilization Project are within the impact boundary identified for the Approved Project analyzed in the 2014 Master Plan EIR. Additionally, the Proposed Stabilization Project does not include any new development or land use changes; therefore, the Proposed Stabilization Project would not affect the operational conditions analyzed in the 2014 Master Plan EIR and subsequent Addenda.

      Although the Proposed Stabilization Project would result in the relocation of operations of the VIP CMHC from the West Campus to Building A/B C/D at the Central Juvenile Hall campus, the relocation would not alter the services provided by the VIP CMHC. The services provided by the VIP CMHC would be consistent with the uses at the Central Juvenal Hall campus. Continuation of ongoing maintenance activities and minor interior improvements and renovation to Building A/B C/D associated with this relocation are limited in nature and would not result in impacts to the environment.

      Although the Proposed Stabilization Project includes a new construction component and two additional buildings proposed for demolition not previously identified in the 2014 Master Plan EIR, the construction activities associated with these new components would not include new construction equipment, intensity

or methods that would substantially increase significant impacts identified in the 2014 Master Plan EIR.

ii. Significant effects previously examined will not be substantially more severe than shown in the previous EIR.

Based on the analysis above, the new components would not result in more severe impacts than those identified in the 2014 Master Plan EIR. All other operational characteristics of the Approved Project would remain unchanged from those evaluated in the 2014 Master Plan EIR and subsequent Addenda.

iii. Mitigation measures or alternatives previously found not to be feasible would not 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 measure or alternative.

Mitigation measures or alternatives previously found not to be feasible at the time the 2014 Master Plan EIR was prepared have not been identified as feasible. The Proposed Stabilization Project would incorporate all applicable mitigation measures from the 2014 Master Plan EIR. The mitigation measures not applicable to the Proposed Stabilization Project would continue to be valid, feasible, and applicable to the Approved Project as refined by in the subsequent Addendum. No new mitigation measures are required.

iv. No 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.

No new mitigation measures or alternatives were identified. The existing applicable mitigation measures from the 2014 Master Plan EIR would reduce impacts to the feasible extent possible. No new mitigation measures or revisions to previously adopted measures are required.

5.2 CONCLUSION

As indicated in this Addendum, the impacts of the Proposed Stabilization Project have already been adequately identified and addressed in the 2014 Master Plan EIR, and no substantial changes have occurred with respect to the circumstances under which the Proposed

Stabilization Project is undertaken that would require major revisions to the 2014 Master Plan EIR. Analysis of the Proposed Stabilization Project shows that there are no new significant environmental effects and no substantial increase in the severity of previously identified significant effects.

Impacts beyond those identified in the 2014 Master Plan EIR would not be expected as a result of the Proposed Stabilization Project, which would still be subject to all applicable mitigation measures from the 2014 Master Plan EIR. The Proposed Stabilization Project would not result in any new information of substantial importance that would have new, more severe impacts, new mitigation measures, or new or revised alternatives from what was identified in the 2014 Master Plan EIR. Previously adopted mitigation measures identified in the 2014 Master Plan EIR MMRP, along with the previously approved Findings and Statement of Overriding Considerations adopted by the Board of Supervisors, would continue to be applicable to the Proposed Stabilization Project.

Based on the record as a whole, there is no substantial evidence that the Proposed Stabilization Project would result in significant environmental impacts not previously studied in the 2014 Master Plan EIR, and accordingly, the Proposed Stabilization Project changes would not result in any conditions identified in CEQA Guidelines, Section 15162. Thus, a subsequent EIR is not required for the changes to the Proposed Stabilization Project, and the County certifies this Addendum to the LAC+USC Medical Center Campus Master Plan EIR in accordance with CEQA Guidelines Section 15164.

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7. REFERENCES

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APPENDIX A

LA COUNTY GENERAL HOSPITAL & WEST CAMPUS STABILIZATION PROJECT COMPONENT SCOPES DESCRIPTIONS

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LA County General Hospital & West Campus

Stabilization Project

Components Scopes

May 2025

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Introduction

In this "Stabilization Project Components Scopes" document, Centennial Partners outlines a comprehensive step by step plan to maintain and remediate the Los Angeles County General Hospital and West Campus, giving continuity to the 2014 LAC+USC Medical Center Master Plan execution, and devised in collaboration with Supervisorial District 1 and LA County. The primary goals of this project are to eliminate hazardous conditions, upgrade the structural integrity of a historic structure, and modernize campus utilities for better efficiency, service delivery, and user safety and wellbeing.

The "Stabilization Project" is structured to ensure compliance with regulatory frameworks while facilitating timely and safe implementation of scopes addressing the most critical campus improvements. While General Hospital tenant relocations are scheduled to conclude by April 2026, and West Campus tenant relocation by June 2026, the introduction of the Restorative Care Villages on the campus and the continued operations of the LA General Medical Center place higher emphasis on the need to immediately improve campus conditions by remaining and incoming users.

The proposed scopes are:

- General Hospital: Maintenance and Seismic Retrofit
- West Campus: Demolition of Hazards & Structures
- West Campus: Site Infrastructure, Remediation and Accessibility
- West Central Plant Decommissioning and Demolition

Finally, a project schedule is provided to support the strategic implementation of these proposed scopes.

General Hospital: Maintenance and Seismic Retrofit

Summary of Proposed Scopes

- Component 1: Clean Out, Remediation and Selective Demolition
- Component 2: Targeted Structural Strengthening and Seismic Retrofit

Background

Retrofitting the General Hospital to meet modern seismic safety standards is essential for preserving the historic structure. Classified as a Risk Category III structure, this risk category applies to buildings whose failure would pose a significant hazard to human life, necessitating enhanced seismic performance. It reflects the structure's critical role in life safety and the need to address potential vulnerabilities.

To accommodate the historic architectural program on the lower floors, many piers, stairs, and elevator core walls terminate above the foundation, resulting in structural discontinuities that form weak or soft lower stories. These conditions increase the risk of collapse for the tower above, even during low to moderate seismic activity. Additionally, the existing stair construction is rigidly attached to the brittle cast-in-place concrete which is a known vulnerability. This type of stair construction is prone to fail, creating loss of vertical circulation and fire egress even following moderate earthquake shaking.

In addition to the structural vulnerabilities, the MEP systems in the General Hospital are outdated and in poor condition—many components have far exceeded their expected lifespans and are failing, making them unsuitable for continued use. The cooling and ventilation systems are deteriorating, with the building lacking centralized cooling and relying instead on window air conditioners from the 1990s. Ventilation fans are rusted

or decommissioned, requiring replacement. The electrical systems, installed in the 1960s, are obsolete, with flooding damage, outdated generators, and inefficient lighting that no longer meet modern standards. The building's electrical infrastructure is compromised, and the plumbing is similarly deteriorating, with rusting sewer pipes, calcified cold-water pipes, a rusting water storage tank, and outdated gas piping and backflow preventers. The water softening system is non-operational and rusted.

Additionally, extensive asbestos-containing materials (ACMs) were found, including in drywall, floorings, thermal system insulation (TSI), ceilings, and roofing, with notable damage to some ACM TSI areas—it is estimated that over 850,000 square feet of ACM flooring and other ACM items remain present. Lead is also present in the building, with positive readings from testing using direct-read XRF devices. Items such as fume hoods and lab tables may also contain asbestos or lead components. While informationally valuable, the limitations and uncertainties in older reports, along with the need for a hazmat contractor to manage potential asbestos, lead, and biohazard materials, underscore the complex nature of addressing these hazards.

Proposed "General Hospital: Maintenance and Seismic Retrofit" Scopes

<u>Component 1: Clean Out, Remediation and Selective Demolition</u>

Considering seismic retrofit requirements and updated code changes, it will be costly or infeasible to salvage the building's existing circulatory infrastructure—such as wiring, ducts, and pipes. Centennial Partners proposes beginning efforts at General Hospital with a clean out and selective demolition scope of work to remove old furniture (including tables, chairs, wheel chairs, old medical operational facility furnishings, debris, cardboard boxes, trash, sandbags, storage containers, fans, tools, old documents, and office equipment) followed by non-essential and non-historical elements (including outdated/deteriorating mechanical, electrical, and plumbing systems, interior finishes, partition walls, flooring, ceilings, and other non-loadbearing

components) while avoiding and preserving character defining features (including the historic lobby, library, and operating theater) and core structural components (such as load-bearing walls, columns, and foundational supports). This process will:

- Expose key structural components
- Help reduce uncertainty in achieving seismic upgrades
- Refine cost estimates for seismic work
- Prevent unnecessary destruction of historically significant features
- Reduce the risk of unknown conditions and potential failures
- Allow for hazardous materials remediation

This effort begins with detailed planning and design before progressing into implementation.

In planning and design, our teams will establish the framework for selective demolition and related scopes. This includes conducting an environmental survey, developing architectural concept plans, and establishing historic preservation guidelines along with preliminary soft demolition plans—all of which are key historic tax credit submittal materials. Fire life safety and ADA code consultants will be engaged to ensure compliance with current regulatory standards.

In implementation, prior to the start of selective demolition, tenant improvements will be completed in buildings #102 (Patient's Building) #103 (Visitor's Building Administrative Offices) located on the General Hospital Forecourt to accommodate the relocation of the Wellness Center.

During selective demolition in General Hospital, ongoing architectural observation and support will be provided, and modifications will be limited to the interior footprint of the building.

Component 2: Targeted Structural Strengthening and Seismic Retrofit

To improve safety for daily users of the LA General Medical Center Campus, Centennial Partners proposes a scope of work to enhance the hospital's seismic performance. The proposed seismic scope includes:

- Upgrade of the building's foundation with new pillars
- Construction of targeted structural reinforcements
- Construction of super walls to address discontinuous wall members in the building's podium and lower floors, while engaging the transfer beams in the tower upper floors

The proposed upgrades will strengthen the structure and reduce seismic movement—helping to prevent costly damage and to preserve the building's historic character—and are the first step in the building's seismic retrofit.

This effort begins with detailed planning and design before progressing into implementation.

In planning and design, the structural engineering team will conduct a seismic risk analysis to evaluate the effectiveness of a range of retrofit concepts to determine which seismic retrofit supplements will be the best approach in improving the building's seismic performance. This analysis will compare each retrofit option against the current structural state, assessing their relative effectiveness in mitigating seismic risk, and will compare post-earthquake repair predictions. This analysis will provide critical data to inform decision-making on the most effective approach to strengthening the structure and develop the seismic retrofit design, and will conclude with refined costs and construction sequencing, and a complete peer reviewed, third-party planchecked, permit ready to issue full seismic retrofit documentation package.

In implementation, we propose advancing the seismic retrofit with the addition of new reinforced concrete walls as overlays on existing walls and as new independent walls that can serve as demising walls. These walls help create a "stiff spline" to limit the amount of earthquake movement the existing façade will undergo during a large

seismic event. New structural elements would be concentrated in strategic areas to avoid alterations to spaces of high historical significance and integrity. The super walls can be supplemented with a new super frame connecting the two concrete cores. This frame element improves the behavior of the building on the upper stories, decreasing the amount of displacement and thus improving the behavior of the building. In a most intensive scenario, they can be further supplemented with the addition of fluid dampers (large "shock" absorbers). The fluid dampers could not only help decrease the amount of displacement (like the super frame achieves) but could also help reduce floor accelerations which will in term limit the extent of damage to nonstructural elements.

All work related to the maintenance and seismic retrofit of the General Hospital will be reviewed and accepted by a qualified historic preservation consultant that will remain involved throughout schematic design development and will provide a conformance review report or memorandum to confirm alignment with the 2010 Reuse and Protective Storage Plan (2010 Reuse Plan), which was reviewed and accepted by the State Historic Preservation Officer (SHPO). Before any selective demolition begins, demolition plans will be carefully developed to ensure that no historic fabric is compromised. Character-defining features—such as corridors, operating rooms, and the surgery theater—will be preserved and treated in coordination with the Office of Historic Preservation (OHP), the National Park Service (NPS), and the State Historic Preservation Officer (SHPO) to maintain the building's status as a certified historic structure. Areas of low, medium, and high historic integrity will be identified, with specific guidelines established for their treatment, including confirmation that soft demolition activities will not compromise future tax credit eligibility, and establishing a clear approach to ongoing historic consultant involvement and community engagement.

West Campus: Demolition of Hazards & Structures

Summary of Proposed Scopes

- Component 1: Phased Demolition of Select Buildings and Structures

Background

Various buildings and structures within the project boundary on West Campus and surrounding General Hospital exhibit widespread structural and functional deficiencies. These include inconsistent foundation depths, extensive concrete cracking and spalling, corroded reinforcement, and inadequate lateral load connections. Many of the structures, primarily aging modular buildings, have surpassed their useful life and are now considered obsolete and inefficient. Their deteriorated condition, outdated layouts, and inability to meet modern operational or safety standards render them unsuitable for reuse. Many of these buildings were constructed with now-outdated methods and materials, and several contain hazardous materials such as asbestos and lead, which require specialized handling and limit their continued occupancy or reuse.

Proposed "West Campus: Demolition of Hazards & Structures" Scopes

Component 1: Phased Demolition of Select Buildings and Structures

Centennial Partners proposes the phased demolition of 23 buildings—inclusive of the West Central Plant (WCP)—as well as various structures on the West Campus and surrounding the General Hospital building, such as outbuildings, yards, warehouses, paved areas, and barracks.

The proposed demolition of select buildings and structures is a critical step in stabilizing the campus. Removing structurally compromised, functionally obsolete, and hazardous-material-laden buildings and structures reduces ongoing liability, simplifies site logistics, allows for safer circulation and access across the campus, and creates opportunities for infrastructure upgrades. This ensures a safer environment for staff, visitors, and neighboring facilities by lowering the risk of collapse or environmental exposure, particularly in seismic or extreme weather events. Additionally, aging, unoccupied buildings still require some level of maintenance, security and pest control. Removing these structures eliminates ongoing costs associated with buildings that no longer serve a functional purpose. Vacant or poorly maintained facilities can attract trespassing, vandalism, and illegal dumping, while clearing the site improves visibility and makes the campus easier to monitor and secure.

This effort begins with detailed planning and design before progressing into implementation.

In planning and design, our teams will conduct comprehensive environmental survey to assess site conditions and inform the work. We will develop detailed demolition plans and pay close consideration to the preservation of existing trees. The development of plans will be guided by historic preservation guidelines, ensuring that all demolition and construction activities respect historic character and comply with applicable preservation standards.

In implementation, the phasing of the demolitions will be strategic and pay particular consideration to “Parking Lot 10 (Bldg #410)”, “Mini Warehouse Building (Bldg #120)”, and “Trash Compactor (Bldg #506)”. P10 contains 809 spaces and is used by patients, visitors and staff. No physical work or demolition will occur until alternative parking has been identified. Additionally, the Mini Warehouse Building houses key Department of Health Services (DHS) functions and no physical work or demolition will occur until an alternative location has been identified. Finally, the Trash Compactor services key campus uses and no physical work or demolition will occur until a replacement has been constructed.

West Campus: Site Infrastructure, Remediation and Accessibility

Summary of Proposed Scopes

- Component 1: Utility Reconfiguration
- Component 2: Soil Remediation
- Component 3: Construction of Circulatory Pathways

Background

The campus presents a series of compounding physical challenges rooted in aging, fragmented, and poorly documented infrastructure. Much of the utility network—including water, sewer, and stormwater systems—is in disrepair or configured in an ad hoc manner. Water service is currently provided by the Los Angeles Department of Water and Power (LADWP) through multiple disconnected points along Zonal Avenue, Marengo Street, and Mission Road. As-built documentation is incomplete and dispersed, with records indicating a 24" cast-iron water main in Marengo Street and a tangle of lateral lines branching off to individual buildings. These utilities appear to have evolved organically over decades rather than as part of a cohesive, planned system. Stormwater and sanitary sewer easements—identified in the ALTA/NSPS Land Title Survey—intersect across the West Campus, introducing logistical challenges and demanding intricate coordination to maintain continuity of service. Currently, the campus lacks recycled water service, though a possible LADWP pipeline extension under the Water Recycling Program has been identified nearby.

Beneath the surface, further technical complexities emerge. The existing buildings are interwoven with utility connections that are both difficult to trace and susceptible to disruption if the structures are removed. The potential for utility conflict is high, especially given the deteriorating condition of many lines and the sensitivity of the

easement corridors that run northeast to southwest through the site. The topography further complicates matters: a dramatic 40-foot elevation change divides the site into upper and lower zones, contributing to accessibility issues and design limitations. A slope analysis revealed that nearly 20% of the campus exceeds 10% slope, with many pedestrian pathways falling outside ADA compliance thresholds. These steep grades are not only a circulation barrier but also structurally linked to existing buildings that, in some cases, act as retaining elements within the landscape.

Environmental testing across the site has also uncovered significant geotechnical and hazardous materials concerns. The soil composition includes urban fill and native soils (Montebello and Nacimiento series) with varied stability, and portions of the lower western area fall within a liquefaction zone. While test borings in some locations showed minimal liquefaction potential, the site remains susceptible to slope movement and settlement. Groundwater depths exceed 80 inches, though exact conditions remain to be confirmed. Compounding these challenges, the site's long history of medical and industrial use has left a legacy of hazardous materials—particularly asbestos and lead within buildings slated for demolition—and potential underground contaminants, such as old fuel lines or buried infrastructure, which will require further investigation and environmental remediation.

Proposed "West Campus: Site Infrastructure, Remediation and Accessibility" Scopes

<u>Component 1: Utility Reconfiguration</u>

Following the demolition of select buildings and structures, the site's complex and aging utility network will require strategic reconfiguration. In planning and design, Centennial Partners proposes a comprehensive utility survey be undertaken to identify which utilities remain in use, which may be abandoned in place, and which should be removed or rerouted. Some conduits or piping may be suitable for reuse, but their alignment and condition must be assessed. Additionally, the decommissioning of

obsolete or hazardous infrastructure will be necessary to eliminate potential risks and to “right size” systems to better serve the reduced campus footprint.

We propose not only identifying which portions of the utility network should be preserved, upgraded, or decommissioned—but in implementation we propose executing on the rerouting and replacement of these systems where necessary. Aging and fragmented utility lines currently traverse buildings slated for removal, and in some instances, intersect with known hazardous material zones or steep grade transitions. The rerouting and replacement will include reconnection of critical water, power, sanitary, and stormwater systems to reflect the revised site configuration and the needs of the remaining active buildings. These system would be redesigned for continued flexibility for the construction of new accessible utility corridors that meet current codes and capacity demands.

Component 2: Soil Remediation

Centennial Partners proposes early and comprehensive site investigations to address subsurface risks. In planning and design, geotechnical testing should be expanded beyond the previously studied zones to provide a consistent campus-wide understanding of soil behavior, liquefaction risks, corrosivity, and foundation design implications. Concurrently, early testing for hazardous materials, including asbestos, lead, and hydrocarbons, should be conducted, especially in areas identified as contaminated or containing legacy medical and industrial waste. Known risks, such as a buried oil well on the superblock’s southern edge and methane mitigation requirements across the site, require confirmation and detailed remediation plans.

In addition to identifying hazardous materials and contaminated soil, Centennial Partners proposes proceeding with implementation of the environmental remediation efforts necessary, carrying out the soil removal, encapsulation, regrading, and compacting or other mitigation strategies as necessary to protect public health and comply with regulatory requirements.

Component 3: Construction of Circulatory Pathways

Centennial Partners proposes the planning, design, and construction of new ADA-compliant circulation pathways throughout the campus following demolition, regrading, and utility work. Once the site is cleared and stabilized, we propose creating a new, interconnected circulation network to serve the needs of current users by improving access to key facilities, particularly between parking areas and operational medical buildings. These improvements will greatly enhance safety, equity, and navigability across the campus, as well as site hydrology, and balancing cut and fill. Together, remediation, utility realignment, and new circulation infrastructure represent foundational steps in stabilizing and modernizing the campus.

West Central Plant Decommissioning and Demolition

Summary of Proposed Scopes

- Component 1: Construction of New Localized Heating and Cooling Systems
- Component 2: Decommissioning and Demolition of West Central Plant

Background

The West Central Plant, originally constructed in the 1960s with partial refurbishments in 2013, was designed to provide central heating and chilled water to several buildings both on and off-site. The plant is now struggling to meet the demands of the current infrastructure. A detailed review of its systems reveals serious limitations.

The plant's chilled water system comprises three chillers, each rated at 700 tons, with one serving as a standby unit. Though replaced in 2013 the chillers are in fair condition and are not operating at full capacity. During peak loads in the summer of 2022, only one chiller was operational at its full 700-ton capacity. While these systems have an estimated 10-13 years of remaining life, they are ill-equipped to reliably and cost effectively handle current campus demands.

The cooling tower system, a crucial component of the plant, dates back to the original 1962 construction. Despite fan replacements in 2013, these towers are in fair condition and require regular maintenance. Additionally, the make-up water connections are in poor condition, further compromising system reliability.

The steam boiler system, consisting of gas-fired boilers installed in 2013, is similarly constrained. While operating at reduced capacity to mitigate energy waste, the boilers are tied to a deteriorating network of original 1962 steam pipes. This piping system is highly inefficient, with up to 50% of capacity lost to leaks during operation, resulting in

fines from the city for energy waste. The leaky steam tunnels are marked as unsafe for repair while operational, further underscoring the unsustainability of the current setup.

Proposed "West Central Plant Decommissioning and Demolition" Scopes

Component 1: Construction of New Localized Heating and Cooling Systems

With General Hospital's planned disconnection from the West Central Plant services once the maintenance and seismic retrofit scopes commence, the only remaining buildings on campus served by the plant will be the OPD/IRD and the Medical Examiner. Given the plant's high maintenance costs, multiple performance and safety issues, and aging, increasingly unreliable systems, continued operation of the plant to service a lower load demand is not feasible. Additionally, given the deteriorated pipes and leaky steam tunnels, the most efficient and reliable solution is for a set of new standalone heating and cooling systems to be constructed in proximity to the buildings being serviced. We propose planning and design to identify suitable locations for the new systems. This design would include the heating and cooling system, power requirements, controls, monitoring, structural platform and protective fencing for a complete, protected system that incorporates sustainability targets. In implementation, these units would be constructed to ensure that essential services remain uninterrupted. These units would be designed as movable systems that can be repurposed or relocated as needed.

The LA General Medical Center 1600-ton chillers located on the General Hospital terrace, which supplement cooling for the new clinic tower, currently receive soft water from the West Central Plant but are otherwise independent of it. We propose planning, designing, and implementing the transition of this water supply to an alternative water system.

Component 2: Decommissioning and Demolition of West Central Plant

Constructing new localized heating and cooling systems and transitioning the water supply will enable the full decommissioning of the West Central Plant. Replacement systems will be built and brought online prior to the plant's decommissioning and demolition. Concurrent with the new localized systems construction, Centennial Partners proposes to design the plant's demolition plans. Once the new systems are operational and the demolition plans finalized, we propose proceeding with the plant's demolition and site clearance.

EXHIBITS

Buildings Proposed for Demolition

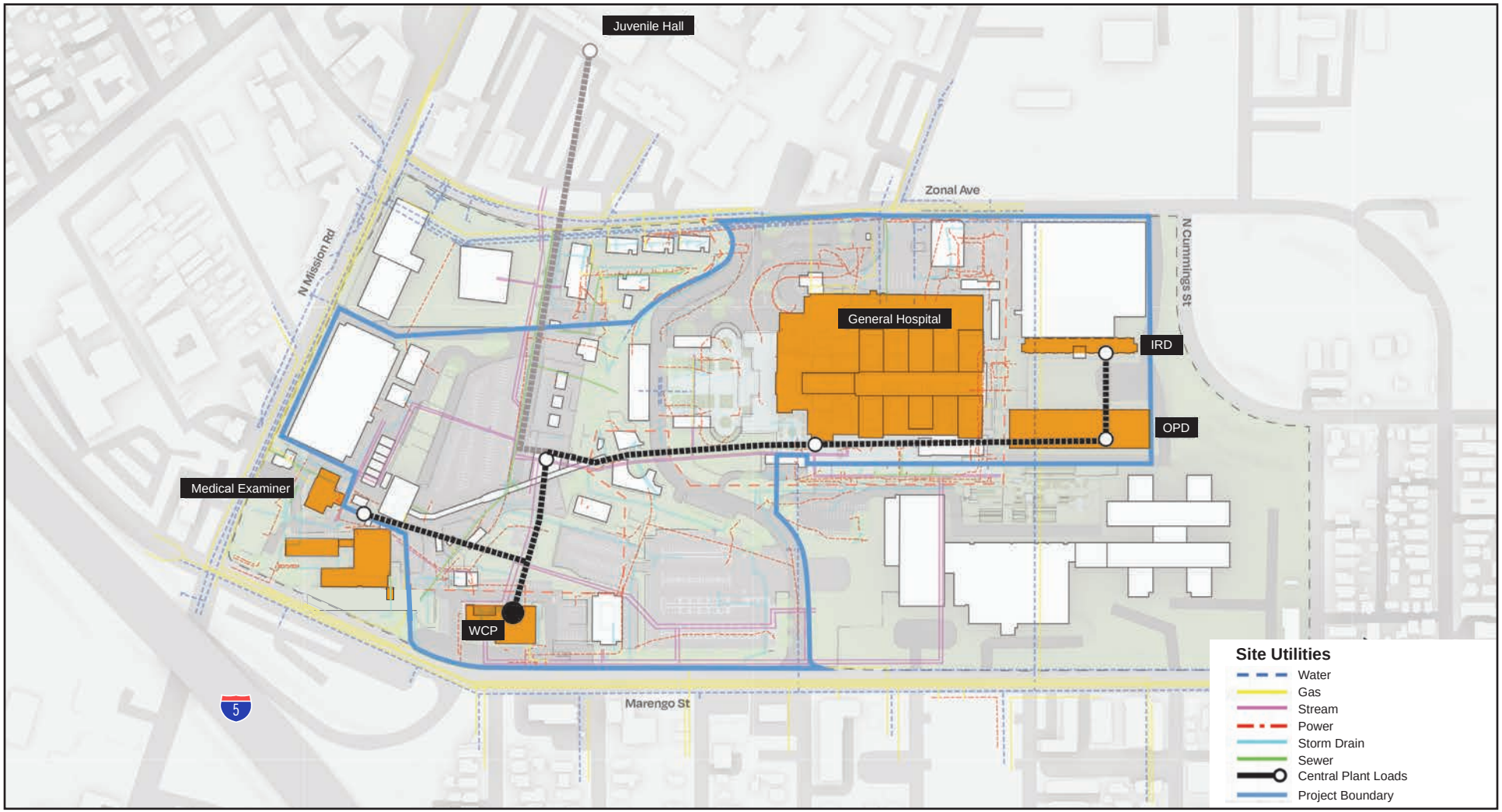
1. Mini Warehouse Building (Bldg #120)
2. Barracks D Building (Bldg #104)
3. Barracks G Building (Thrift Shop) (Bldg #105)
4. Trailer 1 (east)/3 (west) (Bldg #111)
5. Trailer 126 (Bldg #112)
6. Trash Compactor (Bldg #506)
7. Annex I, II, III (Bldg #522, 523, 524)
8. Trailer 8 (Bldg #408)
9. Trailer 15 (Bldg #407)
10. Parking Lot 10 (Bldg #410)
11. Shed 2 (Pharmacy Trailer) (Bldg #538)
12. Shed 1 (Pharmacy Trailer) (Bldg #503)
13a. Main West Central Power Plant (Bldg #516)
13b. Large Cooling Tower
13c. West Central Power Plant Outbuilding
14. General Laboratory Building (Bldg #302)
15. Trailer 17 (Bldg #309)
16. Mason Shop (Bldg #529)
17. Tram Shop (Bldg #528)
18. Tram Shop Storage and Presser Washer Building (Bldg #536)

Project Boundary

0 300
Scale (Feet)

Source: Nearmap 2025.

Aerial Map of Buildings Serviced by West Central Plant



0 400
Scale (Feet)

Source: RIOS

LA County General Hospital & West Campus

Stabilization Project
Components Scopes

May 2025

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APPENDIX B

LA COUNTY GENERAL HOSPTIAL & WEST CAMPUS STABILIZATION PROJECT HISTORIC ASSESSMENT MEMORANDOM

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Historic Assessment Memorandum

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Project:	LA County General Hospital & West Campus Stabilization Project
ARG Project No.:	250214
Date:	May 30, 2025
Via email:	dabasta@primestor.com; garaujo@primestor.com

Introduction

Architectural Resources Group (ARG) has prepared this memorandum related to the LA County General Hospital & West Campus Stabilization Project (the "Proposed Stabilization Project") Addendum to the 2014 LAC+USC Medical Center Campus Master Plan Final Environmental Impact Report ("2014 Master Plan EIR"). The 2014 Master Plan EIR analyzed historical impacts associated with the LAC+USC Medical Center Campus Master Plan (Approved Project), which included the construction of new and renovated medically related office, retail, open space, and parking uses and the demolition of existing buildings and structures on the LAC+USC Medical Center Campus to accommodate the new development. The purpose of this memo is to evaluate whether the Proposed Stabilization Project would modify the Approved Project in such a way as to result in new or more severe significant impacts to historical resources.

In conclusion, ARG finds that the Proposed Stabilization Project would not result in new or more severe significant impacts to historical resources than those identified in the 2014 Master Plan EIR, and thus would not result in the need for subsequent or supplemental review of historical impacts under CEQA.

ARG staff involved in preparing this memorandum include Katie Horak, Principal, and Evanne St. Charles, Senior Associate. Ms. Horak and Ms. St. Charles meet the *Secretary of the Interior's Professional Qualifications Standards* (36 CFR Part 61) in Architectural History.

Methodology

In preparation of this memo, ARG reviewed the following documents:

- Letter to FEMA regarding the preliminary field survey of historic resources on the LACGH campus following the 1994 Northridge Earthquake (HRG, March 7, 1994)
- Memorandum of Agreement between FEMA, SHPO, and Los Angeles County regarding the 1994 Northridge Earthquake Replacement, Mothballing, and Reuse of LACGH (executed 2000)

- LAC+USC Medical Center Replacement Project EA/EIR (ESA, September 1999)
- LAC+USC Medical Center General Hospital Reuse and Protective Storage Plan (Ken Kurose Architect, October 2010)
- LAC+USC Medical Center Campus Master Plan Final EIR (ICF, November 2014)
- Addendum to the 2014 LAC+USC Medical Center Campus Master Plan EIR (ICF, 2017)
- Second Addendum to the LAC+USC Medical Center Campus Master Plan (Impact Sciences and Sirius Environmental, 2023)
- LACGH & West Campus: Stabilization Project Scopes Descriptions (Centennial Partners, May 2025)

Summary of Previous Historical Impacts Findings

The 2014 Master Plan EIR identified several historical resources within the LAC+USC Medical Center Campus, including on the Approved Project Site. Resources identified on the Approved Project Site included the Women's and Children's Hospital and associated Gatehouse (not extant), the General Hospital complex (including the Acute Unit/General Hospital Building, ancillary Payroll/Visitor's Building, Quality Assurance Utilization/Patient's Building, Marengo Street and Zonal Avenue Gateways, Forecourt, and State Street), Viaduct/Tunnel, the Pharmacy/Service Building, and the Old Administration Building. The 2014 Master Plan EIR also notes that the General Hospital Building, Pharmacy/Service Building, Viaduct/Tunnel, Old Administration Building, and Women's and Children's Hospital (not extant), as well as several other buildings and structures that are no longer extant, were found to be eligible as contributors to a potential National Register-eligible historic district through the Section 106 process following the 1994 Northridge Earthquake. The boundaries and period of significance for the potential historic district were not delineated in the available documentation.

The 2014 Master Plan EIR found that the Approved Project would result in unavoidable significant adverse impacts to historical resources due to the proposed demolition of the Women's and Children's Hospital Building, which was determined eligible for listing in the California Register of Historical Resources (California Register). The 2014 Master Plan EIR also determined that impacts to other historical resources due to individual projects under the Approved Project could be significant but would vary, depending on final plans. For example, alterations to the 1933 retaining walls and circulation elements (State Street), which are character-defining features of the General Hospital setting, could cause an adverse change in the significance of the historic hospital building. Mitigation Measures were adopted to reduce the impacts due to potential construction and operational impacts on the historical resources identified in the 2014 Master Plan EIR. The 2014 Master Plan EIR determined that the extent of impacts and the level to which they could be mitigated would be dependent on development of final project plans and the extent of potential alterations to the historical resources on the campus. Therefore, impacts were considered potentially significant after implementation of proposed mitigation measures, and impacts to the Women's and Children's Hospital Building would remain significant and unavoidable.

The 2017 and 2023 Addenda to the 2014 Master Plan EIR did not identify any new or more severe impacts to historical resources.

Project Overview

The Proposed Stabilization Project includes the following project components:

1) General Hospital Building: Maintenance and Seismic Retrofit;
2) West Campus: Demolition of Hazards and Structures;
3) West Campus: Site Infrastructure, Remediation and Accessibility;
4) West Central Plant: Decommissioning and Demolition; and
5) Violence Intervention Program (VIP) - Community Mental Health Clinic (CMHM) Relocation.

Each of the project components and their potential to impact historical resources is described in detail in the following sections.

<u>General Hospital: Maintenance and Seismic Retrofit</u>

Background

As described in the 2014 Master Plan EIR, the General Hospital Building (also known as Acute Unit or Building 835) is eligible for listing in the National Register of Historic Places (National Register) and is listed in the California Register. The building was first identified as individually eligible for designation in the National Register through a 1976 survey prepared by the Natural History Museum. In 1994, the building was formally determined eligible for listing in the National Register and was subsequently listed in the California Register through the Section 106 process following the Northridge Earthquake. The building thus meets the definition of a historical resource for purposes of CEQA.

The General Hospital Building endured significant damage from the Northridge Earthquake. As a result, the Federal Emergency Management Agency (FEMA) provided financial assistance to the County of Los Angeles (the County) for replacement of damaged hospital facilities and subsequent reuse and protective storage of the historic building. The 2010 LAC+USC Medical Center General Hospital Reuse and Protective Storage Plan ("2010 Reuse Plan") was prepared as a condition of the financial assistance FEMA provided to the County and comprised an assessment of existing conditions of the General Hospital structure and systems. The 2010 Reuse Plan also included the identification of significant spaces and character-defining features of the building. Significant spaces include the lobby, rehabilitation pool, pharmacy, trauma ward, kitchen, cafeteria, chapel, library, morgue, surgery auditorium, surgery areas, first floor central corridor, and main axis. Additionally, character-defining features and materials in each of these spaces were identified, and guidelines and recommendations were provided for future work to ensure conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards). Though not specifically discussed in the 2014 Master Plan EIR, the 2010 Reuse Plan was reviewed and

accepted by the State Office of Historic Preservation (OHP) and was a stipulation of the Memorandum of Agreement between FEMA, the OHP, and the County.

In 2025, Holmes US (structural engineer) conducted a preliminary seismic analysis of the General Hospital Building. Their analysis identified multiple seismic vulnerabilities, including its brittle façade; a pier-and-spandrel system with limited ability to accommodate earthquake movement; discontinuous load paths at piers, stairs, and elevator core walls; and brittle cast-in-place concrete stair connections. In addition to the building's structural vulnerabilities, its mechanical, electrical, and plumbing systems (MEP) are outdated and in poor condition, and large amounts of hazardous materials (asbestos, lead, biohazards) were found in building finishes and equipment.

Proposed Work

The Proposed Stabilization Project includes two scopes of work related to the General Hospital Building: 1) clean out, remediation, and selective demolition, and 2) targeted structural strengthening and seismic retrofit. While these proposed improvements to the General Hospital Building were not specifically assumed in the 2014 Master Plan EIR, the 2014 Master Plan EIR assumed that work within the setting of the General Hospital could occur. The proposed maintenance and seismic retrofit improvements are necessary to maintain the aging building and its historical significance. Additionally, these improvements are consistent with all of the objectives stated in the 2014 Master Plan EIR.

Following the full vacation of occupants from the General Hospital Building, work would begin on the clean out, remediation, and selective demolition of non-essential and non-historic elements, including outdated/deteriorating MEP systems; interior finishes, interior partitions, and other non-loadbearing components; and hazardous materials. This selective demolition would expose key structural elements, prevent the unnecessary destruction of historic character-defining spaces and features (identified in the 2010 Reuse Plan and listed above) and allow for hazardous materials remediation.

The proposed targeted structural strengthening and seismic retrofit component would include the evaluation of a range of retrofit concepts, including upgrading the building's foundation with new pillars, construction of targeted structural reinforcements, and construction of super walls to address discontinuous wall members in at the building's podium and lower floors. All retrofit concepts would be designed to minimize impacts to the building's character-defining features and spaces, as identified in the 2010 Reuse Plan. Modifications would be limited to the interior and would not be visible from the exterior of the building.

As concept or pre-design architectural and structural drawings for the stabilization of General Hospital are prepared, a qualified historic preservation consultant would review the drawings and provide early feedback to ensure that the designs conform with the recommendations set forth in the 2010 Reuse Plan. National Park Service (NPS) *Preservation Briefs 17: Architectural Character: Identifying the Visual Aspects*

of Historic Buildings as an Aid to Preserving Their Historic Character and *41: The Seismic Rehabilitation of Historic Buildings* would continue to guide the proposed work. Additionally, the County intends to pursue Federal Historic Preservation Tax Incentives for the General Hospital Building's proposed rehabilitation work, which requires rigorous review by the National Parks Service (NPS) and California Office of Historic Preservation (OHP) for compliance with the Standards.

A qualified structural engineer with experience in historic preservation would review any structural concept or predesign drawings prepared for the stabilization of General Hospital and would prepare a peer review report. Any recommendations contained in the peer review report would be further explored as the design progresses. The qualified historic preservation consultant would continue to engage in design collaboration through the development of schematic design drawings, at which point a conformance review report or memo would be prepared describing the Project and its continued conformance with the 2010 Reuse Plan and the Standards.

Evaluation of Impacts

Consistent with the 2010 Reuse Plan and as a Project Design Feature, the initial maintenance and seismic retrofit of the General Hospital Building would comply with the Standards. Specifically, the proposed work would be undertaken in such a way as to minimize change to the building's defining characteristics as outlined in the 2010 Reuse Plan. The removal of character-defining materials or alteration of distinctive features and spaces would be avoided to the extent feasible, and the historic character of the property would be preserved. New structural elements would be concentrated in strategic areas to avoid alterations to distinctive materials and spaces. The new elements would be differentiated, but compatible with the design of the historic structure.

In summary, the historic character and significance of the General Hospital Building would be retained and preserved under the proposed maintenance and seismic retrofit work, and the proposed work would meet the Standards. According to CEQA Guidelines Section 15064.5(b)(3), projects that comply with the Standards benefit from a regulatory presumption that they would have a less than significant adverse impact on historical resources. Thus, the proposed maintenance and seismic retrofit of the General Hospital Building would not result in any new or more severe significant impacts to historical resources than those identified in the 2014 Master Plan EIR.

<u>West Campus: Demolition of Hazards and Structures</u>

Background

Several buildings and structures within the Proposed Stabilization Project boundary on the West Campus and surrounding the General Hospital Building exhibit widespread structural and functional deficiencies, including inconsistent foundation depths, extensive concrete cracking and spalling, corroded

reinforcement, and inadequate lateral load connections. In addition to their deteriorated condition, many of the structures contain hazardous materials, such as asbestos and lead, further limiting their feasibility for reuse.

Proposed Work

The Proposed Stabilization Project includes the phased demolition of the following select buildings and structures within the West Campus and surrounding the General Hospital building, including outbuildings, warehouses, trailers, and barracks. Removing structurally compromised, functionally obsolete, and hazardous-material-laden buildings and structures reduces ongoing liability, simplifies site logistics, allows for safer circulation and access across the campus, and creates opportunities for infrastructure upgrades.

Select Buildings and Structures Proposed for Demolition		
Building Name	**Square Footage**	**Identified for Demolition in the 2014 Master Plan EIR? Yes/No**
Shed 1 (Pharmacy Trailer) (Bldg. #503)	1,841	Yes
Shed 2 (Pharmacy Trailer) (Bldg. #538)	2,200	Yes
West Central Power Plant (Bldg. 516)	19,469	Yes
Barracks D Building (Bldg. #104)	2,690	Yes
Barracks G Building (Thrift Shop) (Bldg. # 105)	1,940	Yes
Trailer 1 (east)/Trailer 3 (west) (Bldg. #111)	8,620	Yes
Parking Structure 10 (Bldg. #410)	326,578	Yes
Trailer 15 (Bldg. #407)	2,588	Yes
Trailer 8 (Bldg. #408)	5,390	Yes
Trash Compactor (Bldg. #506)	483	Yes
Annex I, II, III (Bldg. #522, #523, #524)	2,850[1]	Yes
Mason Shop (Bldg. #529)	5,000	No
General Laboratory Building (Bldg. #302)	24,978	No
Trailer 17 (Bldg. #309)	4,656	Yes
Mini Warehouse Building (Supply Chain) (Bldg. #120)	27,899	Yes
Trailer 126 (Bldg. #112)	10,512	Yes
Tram Shop (Bldg. #528)	1,350	Yes

Tram Shop Storage and Presser Washer Building (Bldg. #536)	77	Yes
Total	**449,121**	**--**
1. 3 structures at 950 square feet each.		

Evaluation of Impacts

Though not identified for demolition under the Approved Project, the General Laboratory Building (#302) was surveyed by ICF during the preparation of the 2014 Master Plan EIR and found ineligible for listing in the National and California Registers. Based on a review of previous documentation and supplemental research, ARG finds that there is no new evidence that suggests the building would be considered a historical resource for purposes of CEQA. The Mason Shop (#529) was built between 1999-2000 and is generally too young to be considered a historical resource for the purposes of CEQA. It does not appear to be of exceptional importance, and its recent construction date precludes an evaluation of historical significance from scholarly perspective. Therefore, the General Laboratory and the Mason Shop are not considered historic resources under CEQA.

For the above reasons, the proposed demolition of the above-listed buildings and structures would not result in any new or more severe significant impacts to historical resources than those identified in the 2014 Master Plan EIR.

<u>West Campus: Site Infrastructure, Remediation and Accessibility</u>

Background

The West Campus presents a number of challenges related to its aging, fragmented, and poorly documented infrastructure. Specifically, much of its utility work (water, sewer, stormwater systems) is discontiguous and in disrepair, and as-built documentation is incomplete, making the potential for utility conflict high. Additionally, the 40-foot elevation change from the east to the west ends of the site contributes to accessibility and design limitations, and environmental testing across the site has uncovered significant geotechnical and hazardous materials concerns (liquefaction zones, asbestos and lead-containing materials related to the site's medical and industrial use, and potential underground contaminants such as old fuel lines).

Proposed Work

The Proposed Stabilization Project would include the following components: utility reconfiguration; soil testing, grading, and remediation; and the construction of new circulatory pathways, all of which are important to stabilizing and modernizing the West Campus. Following the demolition of select buildings and structures, a comprehensive utility survey would be undertaken to identify which utilities would

remain in use, which would be abandoned, and which would be removed and rerouted. The rerouting and replacement would reconnect water, power, sanitary, and stormwater systems to reflect the revised site configuration and the needs of remaining buildings. The proposed work would also include comprehensive soil testing, including geotechnical testing and testing for hazardous materials. Soil removal, encapsulation, regrading, and compacting would be undertaken as necessary. After regrading and utility work, new Americans with Disabilities Act (ADA)-compliant circulation pathways would be planned, designed, and constructed throughout the West Campus to improve access between key facilities (i.e. between parking areas and operational medical buildings). These activities were assumed within the 2014 Master Plan EIR, which envisioned a comprehensive redevelopment of the campus that would include utility and circulation enhancements, as well as site grading and soil remediation.

Evaluation of Impacts

No demolition, regrading, or construction of new circulation paths that is undertaken as part of this component would impact character-defining features of the General Hospital Building and setting, including but not limited to the historic forecourt, flanking ancillary buildings, retaining walls, and vehicular circulation (State Street). Nonetheless, the below 2014 Master Plan EIR mitigation measures will be incorporated as needed to ensure the work proceeds in such a way that there are no impacts to historical resources.

> **Mitigation Measure 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.
>
> **Mitigation Measure 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.

Furthermore, the Project team includes historic architects and consultants who meet the *Secretary of the Interior's Professional Qualifications Standards* to ensure that the infrastructure work would not adversely affect the historic significance of the General Hospital building as the Proposed Stabilization Project progresses. For the above reasons, the proposed site infrastructure, soil remediation, and accessibility improvements would not result in any new or more severe significant impacts to historical resources than those identified in the 2014 Master Plan EIR.

West Central Plant: Decommissioning and Demolition

Background

The West Central Plant (WCP) is outdated with a limited life expectancy remaining. Sitewide utilities originate from the WCP, but the plant is operating with significant capacity loss and unsafe conditions. The chilled water system is ill-equipped; the cooling tower system requires regular maintenance and the make-up water connections are in poor condition; and the steam boiler system's piping is inefficient and leaks.

Proposed Work

Once the General Hospital Building's proposed maintenance and seismic retrofit work commences and the building is disconnected from the WCP, the only remaining buildings served by the WCP will be the Outpatient Department (OPD)/Interns and Residents Department (IRD) and the Medical Examiner buildings. The proposed work includes the construction of new standalone heating and cooling systems to service these buildings. The 1600-ton chiller located on the General Hospital terrace, which receives soft water from the WCP but is otherwise independent, would transition to an alternative water system. Once the new localized heating and cooling systems and transitioning of the water supply occurs, the WCP would be decommissioned and demolished.

Evaluation of Impacts

Constructed in 1962 the WCP was founded ineligible for listing in the National Register and California Register during ICF's field survey in preparation of the 2014 Master Plan EIR. Based on a review of previous documentation and supplemental research, ARG finds that there is no new evidence that suggests the building would be considered a historical resource for purposes of CEQA. Furthermore, demolition of the building was proposed in the 2014 EIR and subsequent 2017 and 2023 Addenda, and its demolition has already been determined to have no significant impacts to historical resources.

For the above reasons, the proposed construction of new standalone heating and cooling systems and decommissioning and demolition of the WCP would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR.

Violence Intervention Program (VIP) – Community Mental Health Center (CMHC)

Background

Portions of the West Campus are currently being leased and occupied by a third-party County tenant, Violence Intervention Program (VIP) – Community Mental Health Center (CMHC), a nonprofit that

provides mental health, crisis intervention, and medication support services to children and their families who have been victims of domestic violence and/or child abuse.

Building A/B C/D is located within the Central Juvenile Hall campus, outside of the boundaries identified in the 2014 Master Plan EIR for the Approved Project. Building A/B C/D was constructed in 2003 and was occupied until July 2023. The building's fire alarm and closed circuit television system was installed in 2020; however, the remaining equipment is original.

Proposed Work

Under the Proposed Stabilization Project, VIP CMHC would vacate a portion of their West Campus operations and services. The staff, operations, and services vacated from a portion of the West Campus would be relocated to Building A/B C/D within the Central Juvenile Hall campus pursuant to a Gratis Lease with VIP CMHC. The relocated operations and services would be compatible with the existing uses within the Central Juvenile Hall campus, which provides mental healthcare services to youths.

Minor interior renovations and ongoing maintenance such as repairs and upgrades to interior furniture, fixtures, and equipment would be undertaken at Building A/B C/D to prepare the facility to provide the existing outpatient clinical services and case management services.

Evaluation of Impacts

Constructed in 2003, Building A/B C/D is generally too young to be considered a historical resource for the purposes of CEQA. It does not appear to be of exceptional importance, and its recent construction date precludes an evaluation of its historical significance from a scholarly perspective. Thus, Building A/B C/D is not considered a historic resource under CEQA, and its minor interior renovation and proposed upgrades under the Proposed Stabilization Project would not result in any new or more severe significant impacts to historical resources than those identified in the 2014 Master Plan EIR.

Conclusion

In conclusion, the Proposed Project would not result in any new or more severe significant impacts than those identified in the 2014 Master Plan EIR. There are multiple extant historical resources on the Proposed Stabilization Project Site that were identified in the 2014 Master Plan EIR. With the exception of the General Hospital Building, no work is proposed on the other identified historical resources under the Proposed Stabilization Project. The General Hospital Building: Maintenance and Seismic Retrofit has been designed to conform with the Secretary of the Interior's Standards and would thus have a less than significant adverse impact on the historical resource.

Furthermore, while the 2014 Master Plan EIR indicates that a potential National Register-eligible historic district had been identified on the West Campus in 1994 (exact district boundaries are not delineated), based on ARG's supplemental research, it appears that the majority of contributing buildings enumerated in the 1994 Section 106 documentation are no longer extant. Because significant erosion of the historic district has occurred since it was originally identified, there no longer appears to be a significant concentration of resources that would constitute an eligible historic district under CEQA. Thus, the Proposed Stabilization Project would not have a significant adverse impact on a historic district.

APPENDIX C

ADOPTED 2014 MASTER PLAN EIR MITGATION MEASURES

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Adopted 2014 Master Plan Environmental Impact Report Mitigation Measures

Provided below is a comprehensive list containing all the adopted mitigation measures from the Mitigation Monitoring and Reporting Program prepared for the LAC+USC Medical Center Campus Master Plan Project (Approved Project) in conjunction with the 2014 LAC+USC Medical Center Campus Master Plan Project Environmental Impact Report (2014 Master Plan EIR). The previously adopted mitigation measures continue to be valid, feasible, and applicable to the Approved Project (as refined by the projects analyzed in the subsequent Addenda to the 2014 Master Plan EIR).

Table 1 Adopted 2014 Master Plan EIR 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.

Table 1 Adopted 2014 Master Plan EIR Mitigation Measures

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:
  ○ On Day 1, for trees with cavities, crevices, and exfoliating bark, and that are found to support roosting bats, Step 1 would be the removal of branches and limbs with no cavities. These limbs shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree, which may not have been detected during the preconstruction survey, will either abandon the roost immediately (rarely) or, after emergence, will avoid returning to the roost. For foliage roosting bats, Step 1 would be to remove adjacent, smaller, or non---habitat trees to create noise and vibration disturbance that would cause abandonment. On Day 2, under the supervision of a qualified biological monitor familiar with the life history of subject bat species, the tree may be removed.
  ○ Qualified biologists should search all downed roost trees for dead and injured bats. The presence of dead or injured bats that are species of special concern shall be reported to CDFW.
○ Non-maternity roost trees should ideally be removed or trimmed in the fall between September 16 and October 31. If the removal of non-maternity roost trees cannot be timed to occur within this period, tree trimming and removal of non- maternity roost trees shall be timed to avoid periods of inclement or unseasonably cold weather to avoid impacts on bats in torpor (a period of seasonal inactivity). In all circumstances, qualified biologists shall monitor non-maternity tree removal.

MM-BIO-2: The County shall avoid the nesting season for birds or conduct preconstruction nesting bird surveys if construction activities are carried out during the nesting season. To ensure compliance

Table 1 Adopted 2014 Master Plan EIR Mitigation Measures

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.

Table 1 Adopted 2014 Master Plan EIR Mitigation Measures

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.

Table 1 Adopted 2014 Master Plan EIR Mitigation Measures

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

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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 and Soils
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

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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.

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○ *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.

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○ 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 and Hazardous Materials
MM-HAZ-1: In order to minimize exposure, prior to demolition activities, asbestos-containing materials and lead-based paint surveys and evaluations shall be conducted in buildings that are to be demolished or renovated. Abatement measures shall be implemented in accordance with the recommendations of these evaluations. Asbestos surveys shall be conducted in accordance with SCAQMD Rule 1403, which specifies that all surveys are to be carried out by a Cal/OSHA-certified asbestos consultant and will follow established survey protocols, notification, and work practice requirements. Lead-based paint surveys shall be carried out by California Department of Public Health (CDPH)-certified inspector/assessor. If necessary, a lead abatement plan would be prepared by the CDPH-certified project monitor or supervisor, and demolition activities would be performed by CDPH-certified workers.
MM-HAZ-2: Prior to start of construction, an additional investigation of the leaking underground storage tank site at 1200 North State Street (according to SWRCB's GeoTracker website, groundwater is currently being monitored at the address) shall be conducted to determine its potential impact on project site development. In the event that environmental concerns are discovered, a certified geologist or industrial hygienist will specify an appropriate course of action, which may involve removal and disposal of contaminated materials, and remediation of the area of concern.
MM-HAZ-3: As part of a Phase II Environmental Site Assessment, prior to construction, additional investigations at the former suspected locations of USTs (both abandoned in place and those where no records of removal have been found) and the former boilers and powerhouse. In the event that environmental concerns are discovered, a certified geologist or industrial hygienist will specify an appropriate course of action, which may involve removal, disposal, and remediation of the area of concern.
Hydrology and Water Quality
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

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General Permit, erosion/sediment control plan, and submit these plans for approval by the governing regulatory agency. The contractor(s) shall then perform all construction activity in accordance with the recommendations in the SWPPP, the Construction Activities Storm Water General Permit, and erosion/sediment control plan. The contractor's erosion control plan must comply with the California Stormwater Best Management Practices Handbook and meet the requirements of the statewide Construction General Permit.
MM-HYD-2: LID features shall be designed to improve water quality and minimize the leaching of nutrients from growing media. Best design practices based on the latest monitoring and research recommendations shall be incorporated. In addition to avoiding the use of growing media, mulch, and compost containing animal products, which may leach nutrients, design modifications may include incorporation of an internal storage zone. With an internal storage zone, the underdrain is elevated and anaerobic conditions are created, causing denitrification to occur, provided that a carbon food source is provided for the denitrifying bacteria. Additionally, due to the large area of proposed landscaping, phosphorous is a likely pollutant in stormwater runoff from the site. Phosphorous can be minimized through organic maintenance methods, Integrated Pest Management, and avoiding products containing animal manure or other animal products. Although these practices apply specifically to bioretention, they should also be considered for other landscape-based LID features that could be included in the final design. If phosphorous is added to the 303(d) list for the Los Angeles River Reach 2 or the Tier 3 Pollutants of Concern for the Los Angeles River Watershed Management Area, then it becomes a pollutant of concern for the receiving water body and the specialized design measures shall be incorporated at the landscape-based LID features proposed for the site.
MM-HYD-3: Where groundwater seepage is expected, permanent monitoring wells shall be installed during construction within and around the perimeter of each building to monitor the groundwater level and evaluate the performance of the dewatering system. Before starting dewatering operations, a baseline conditions survey shall be made of all adjacent foundations and structures to assess the impact of deep excavation dewatering on adjacent structures. All signs of existing distress shall be recorded.
MM-HYD-4: Irrigation water demands above existing irrigation demands shall be met by alternative supply sources to the maximum extent technically feasible. The use of alternative water supply sources for irrigation shall be maximized to reduce the use of potable water for irrigation and approximate existing irrigation demands. Alternative water supply sources include, but are not limited to, reclaimed water, gray water, harvested rainwater (stormwater), and air---conditioning condensate (although not specifically mentioned in the master plan, this could represent a significant source of clean irrigation water).
MM-HYD-5: During and after construction, positive drainage shall be provided to direct water away from buildings and foundations. Where positive drainage is not provided, area drains shall be used to drain depressions or low spots that are not part of the designed LID features. Area drains shall not be placed next to buildings or in contact with buildings. All area drains and LID features shall be located,

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at a minimum, 8 feet away from building foundations or as directed in the International Building Code or other regulatory requirements. Roof drainage shall be controlled and directed to proper drainage devices in an acceptable manner or to LID features.
MM-HYD-6: An Operations and Maintenance Plan shall be developed for LID features at the site during the design of the initial development projects and expanded as development progresses and different LID features are added. The plan shall consider impacts on water quality and address issues related to Integrated Pest Management or organic maintenance practices, including those for hand weeding. The use of fertilizers, pesticides, herbicides, and products containing animal manure or animal products shall be avoided within any LID features at the project site. Outside of the LID features, Integrated Pest Management and organic maintenance practices shall be used.
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. ○ 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.

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○ The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
○ To the extent practicable, temporary barriers should be employed around the project site and/or around noisy construction equipment.
○ For barriers to be effective they should break the line-of site between the equipment and any noise-sensitive receiver. These barriers may be constructed as follows:
  ○ From commercially available acoustical panels lined with sound absorbing material (the sound absorptive faces of the panels should face the construction equipment).
  ○ From common construction materials such as plywood and lined with sound absorptive material (the sound absorptive material should face the construction equipment).
  ○ From acoustical blankets hung over or from a supporting frame. The blankets should provide a minimum sound transmission class (STC) rating of 28 and a minimum noise reduction coefficient (NRC) of 0.80 and should be firmly secured to the framework with the sound absorptive side of the blankets oriented towards the construction equipment. The blankets should be overlapped by at least 6 inches at seams and taped so that no gaps exist. The largest blankets available should be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier.
○ Construction employees shall be trained in the proper operation and use of the equipment. Careless or improper operation or inappropriate use of equipment can increase noise and vibration levels. Poor loading, unloading, excavation, and hauling techniques are examples of how a lack of adequate guidance and training may lead to increased noise and vibration levels.
○ Storage, staging, parking, and maintenance areas shall be located away from sensitive receptors. Where this is not possible, the storage of waste materials, earth, and other supplies should be positioned in a manner that will function as a noise barrier to the closest sensitive receivers.
○ Stationary noise sources such as generators and compressors should be positioned as far away as possible from noise sensitive areas.
○ Construction equipment shall be stored on the project site while in use. This will eliminate noise associated with repeated transportation of the equipment to and from the site.
○ To the extent possible, haul roads should not be designated through noise-sensitive areas.

MM-NOI-2: Design Non-Residential Project Buildings to Comply with CALGreen Exterior-to-Interior Noise Control Standards. During the architectural and engineering design phase of each new non-residential building that would be located within the 65 dB CNEL contour of any of the surrounding roadways (i.e., within 129 feet of Marengo Street, 172 feet of Mission Road, 46 feet of Zonal Avenue, 590 feet of I-5, or 482 feet of I-10), and prior to the issuance of any building permits for the building, the County shall retain an acoustical consultant to evaluate the design and 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

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enforcement authority, such as factories, stadiums, storage, enclosed parking structures and utility buildings."
MM-NOI-3: Design Residential Project Buildings to Comply with the County of Los Angeles Building Code's Interior Noise Standards. During the architectural and engineering design phase of each new residential building to be developed as part of the project, and prior to the issuance of any building permits for the building, the County shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to comply with the County of Los Angeles Building Code's interior noise standard of 45 dB L_{dn} or CNEL. Such mitigation measures may include, but are not limited to: installation of sound-rated windows or upgrades to façade wall elements.
MM-NOI-4: Design Project Facilities to Ensure All Mechanical Equipment Complies with Chapter XI of the City of Los Angeles Municipal Code. During the architectural and engineering design phase of each new facility (building, central plant, parking structure, etc.) that would introduce new mechanical equipment to the project site, and prior to the issuance of any building permits for the facility, the County shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to ensure that the mechanical equipment complies with Chapter XI of the City of Los Angeles Municipal Code. Such recommendations may include, but are not limited to: changes in equipment locations, upgrades to central plant buildings, rooftop parapet walls, acoustical louvers or screens, or intake and exhaust silencers.
MM-NOI-5: Design and Manage Outdoor Use Areas to Ensure Organized Outdoor Events Comply with Chapter XI of the City of Los Angeles Municipal Code. Prior to the issuance of any building permits for outdoor use areas that are anticipated to host organized events such as outdoor markets, farmers markets, summer concerts and health marches, etc. the County shall retain an acoustical consultant to evaluate the design (event layout, sound system design, etc.) and operational event details (crowd sizes, times of operation, etc.) to ensure that such events will comply with Chapter XI of the City of Los Angeles Municipal Code. Such recommendations may include, but are not limited to: controls on crowd sizes and event times, and limits on sound system power levels.
MM-NOI-6: Reduce Construction-Generated Groundborne Vibration to the Extent Possible. The County shall implement the following vibration reduction measures during construction: ○ Where possible, impact pile driving should be replaced with other piling techniques, such as vibratory pile driving or drilled and poured-in-place piles. ○ To the extent possible, heavy construction equipment should not be operated within 111 feet of on-site or off-site sensitive receptors.
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.

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Transportation
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.

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MM-TRAF-3: The County shall explore implementation of the following TDM measures to further reduce vehicle trips: ○ provide bicycle parking for new development that exceeds the County's code requirement; ○ provide other bicycle-supportive amenities such as bicycle lockers; ○ locate a station of a bicycle-sharing system on-site; ○ expand the County-operated Wellness Center Shuttle to include more stops on or near the site; and, work cooperatively with other transit providers (Metro, LADOT, Metrolink, Foothill Transit, USC) to establish new transit stops or stations or to upgrade existing transit stops adjacent to the Medical Center or in the local area.
Utilities and Service Systems
MM-UTL-1: In conjunction with preparation of a subsequent CEQA environmental document for any future development project under the master plan proposed in 2035 and beyond that is defined as a "water-demand project" in Section 15155 of the CEQA Guidelines, the County shall request, pursuant to Section 15155, that the water provider determine whether the projected water demand associated with the project was included in the most recently adopted urban water management plan. If required pursuant to Section 15155 and SB 610, the County shall request that LADWP prepare a water assessment for the proposed project. The County shall determine, pursuant to Section 15155, whether projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses.
MM-UTL-2: Prior to issuance of a building permit for any future development project under the master plan that could result in an increase in wastewater generation, the County shall coordinate with the City of Los Angeles Bureau of Sanitation to conduct further detailed gauging and evaluation to identify a specific sewer connection point with sufficient capacity. If the public sewer has insufficient capacity, then the County shall be required to build a sewer line to a point in the sewer system with sufficient capacity.
Source: LAC+USC Medical Center Campus Master Plan Environmental Impact Report.

APPENDIX D

EIR ADDENDUM PREPARERS' QUALIFICATIONS

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ADDIE FARRELL

Principal

Addie is a seasoned project director with over 21 years of experience who navigates the CEQA and NEPA processes for a wide range of project types, from remediation to recreation to infrastructure to health care and beyond. She excels at providing her clients with strategic and holistic support, advising on a broad array of technical and strategic issues. Her dedication and professional style have brought her a number of complex and high-profile projects that have earned awards from both AEP and APA.

Addie leads PlaceWorks' CEQA/NEPA practice for the Los Angeles region and oversees environmental staff from our Los Angeles office, managing diverse in-house and subconsultant teams. She oversees all aspects of the environmental process and ensures adherence to budget and scope. She also leads public and stakeholder meetings and excels at delivering public and staff presentations, even in high-pressure settings. She pays keen attention to quality and detail and maintains that attention in the most challenging situations.

HIGHLIGHTS OF EXPERIENCE

Public- and Private-Sector Environmental Services

- Gas Company Tower Acquisition CEQA Exemption | Los Angeles County CA
- Los Angeles County Westside Area Plan and Program EIR | Los Angeles County CA
- Norwalk Entertainment District-Civic Center Specific Plan EIR | Norwalk CA
- Rose Bowl Operating Company Brookside Golf Club Improvements IS/MND | Pasadena CA
- Del Amo Circle Residential Project Sustainable Communities Environmental Assessment | Torrance CA
- Beach Avenue/La Colina Drive Development Project EIR Addendum | Inglewood CA
- Battery Energy Storage Facility IS/MND | Industry CA
- Long Beach Congressional 6700 PCH CEQA 15183 Review | Long Beach CA
- Long Beach 6500 E. PCH Mixed-Use Project CEQA 15183 Review | Long Beach CA
- 6615 E. PCH Mixed Use Project "Marketplace" CEQA 15183 Review| Long Beach CA
- Prologis Vermont and Redondo EIR | Los Angeles CA
- The Mercury Mixed-Use Development Project IS/MND | Pico Rivera CA
- Artesia Downtown Specific Plan EIR | Artesia CA
- Various Environmental Peer Reviews for City of Inglewood | Inglewood CA
- Anaheim Focused General Plan Update EIR | Anaheim CA
- Anaheim Wyndham Hotel Density Modification IS/MND | Anaheim CA
- OCVIBE Streamlined CEQA Review | Anaheim CA
- La Palma Park Improvements CE (NEPA) | Anaheim CA

EDUCATION

- BA, Natural Resource and Environmental Geography, San Diego State University

AFFILIATIONS

- Association of Environmental Professionals

PROFESSIONAL ACTIVITIES

- Environmental Professional Panelist, AEP Annual Conference 2023, "Young Planners Panel"
- Instructor, AEP CEQA Essentials Workshop, Inland Empire and Los Angeles Chapters | 2017, 2022, and 2023
- Panelist, AEP Annual Conference 2021, "Subsequent Environmental Review Amidst a Sea of Evolving CEQA Law and Regulations"
- Chair, AEP Awards Committee, San Diego Chapter | 2007–2009

Team member since 2020

PLACEWORKS

ADDIE FARRELL
Principal
afarrell@placeworks.com

- Orange County Great Park Phase 2 EIR Addendum | Irvine CA
- Los Alamitos Town Center GPA Addendum | Los Alamitos CA
- Medical Office Building at 508 Las Tunas Drive IS/MND Addendum | San Gabriel CA
- Rose Bowl Operating Company Arroyo Seco Music and Arts Festival EIR Addendum | Pasadena CA
- Various Park Projects Mitigation Compliance and Biological Surveys | Los Angeles CA
- Shoreline Specific Plan EIR | Long Beach CA
- Vista Homes Class 32 Categorical Exemption | Torrance CA
- South Hills Bike Park IS/MND | Glendora CA
- Inglewood General Plan | Inglewood CA
- Starbucks Project Categorical Exemption | San Gabriel CA

School Facilities Planning CEQA Projects

- CEQA for New Rosemead Satellite Campus, Pasadena CCD | Pasadena CA
- Digital Media Center Joint Use Occupancy Categoric Exemption, Rancho Santiago CCD | Santa Ana CA
- CEQA for New Fontana Campus, Chaffey CCD | Rancho Cucamonga CA
- Malibu MS and HS Specific Plan and EIR, Santa Monica-Malibu USD | Malibu CA
- McKinley ES EIR for Campus Master Plan Update, Santa Monica-Malibu USD | Santa Monica CA
- Grant ES EIR for Campus Master Plan Update, Santa Monica-Malibu USD | Santa Monica CA
- 49th Street ES Modernization Project IS/ND, Los Angeles USD | Los Angeles CA
- Bright Star Schools Rise Kohyang Charter HS IS/MND, Los Angeles USD | Los Angeles CA

PRIOR EXPERIENCE

- Rancho Los Amigos EIR | Los Angeles County CA
- Arroyo Seco Music and Arts Festival EIR | Pasadena CA
- Santa Susana Field Laboratory Final EIR for DTSC | Ventura County CA
- Hansen Dam Skate Park IS/MND and Environmental Assessment | Los Angeles CA
- Santa Barbara Courthouse Categorical Exemption | Santa Barbara CA
- Topock Compressor Station Environmental Review (Multiple EIRs under DTSC contract) | Needles CA

SPEAKING ENGAGEMENTS

- Environmental Professional Panelist, AEP Annual Conference 2023, “Young Planners Panel” Instructor, AEP CEQA Essentials Workshop, Los Angeles Chapter | 2022 and 2023
- Panelist, “Subsequent Environmental Review Amidst a Sea of Evolving CEQA Law and Regulations,” AEP Annual Conference 2021
- Instructor, AEP CEQA Essentials Workshop, Inland Empire and Los Angeles Chapters | 2017, 2022, and 2023

AWARDS

- Malibu Middle and High School Campus Specific Plan EIR | 2023 Outstanding Environmental Analysis Document, AEP California
- Norwalk Entertainment District–Civic Center Specific Plan EIR | 2023 Outstanding Environmental Analysis Document, AEP California; 2023 Environmental Planning Award of Merit, APACA-LA

CHRISTHI MROSLA

Associate

Christhi is a highly versatile and valued member of PlaceWorks' Environmental Services team. She has a talent for understanding the complexities of a project or community and responding to that complexity with a multidisciplinary approach and an eye for detail.

Christhi supports and manages a broad range of CEQA project types, including industrial, residential, mixed-use, commercial, and developments, as well as new and expanding school facilities projects throughout southern California. In this role, Christhi interfaces directly with clients, selects and manages teams of subconsultants, and guides and works closely with internal project planning, technical services, and support staff. She also coordinates with various public agencies and State Clearinghouse representatives, and she experienced with preparing and presenting public meeting presentations.

HIGHLIGHTS OF EXPERIENCE

Public- and Private-Sector Environmental Services

- Los Angeles County Westside Area Plan and Program EIR | Los Angeles County CA
- Anaheim Focused General Plan Update EIR | Anaheim CA
- City of Santa Ana Short-Term Rental Prohibition Ordinance EIR Addendum | Santa Ana CA
- Chapman Corridor Revitalization Plan Exemption | Placentia CA
- Placentia SP-5 Specific Plan EIR | Placentia CA
- Kite Realty / Ontario Regal Cinemas Planned Unit Development | Ontario CA
- Artesia Downtown Specific Plan EIR | Artesia CA
- Beaumont/79 North Logistics Center Administrative Draft EIR Peer Review | Beaumont CA
- Oak Valley Village 15183 Compliance Peer Review | Beaumont CA
- CEQA Peer Review for 850 Quartz Hill Subdivision | Redding CA

School Facilities Planning CEQA Projects

- Mark Twain School Expansion Project IS/MND, Garden Grove USD | Garden Grove CA
- Fairway ES EIR Addendum, Beaumont USD | Beaumont CA
- Banning TK-8 New School EIR Addendum, Beaumont USD | Beaumont CA
- Hope Junior HS Gym-Classroom Project IS/MND, Hope ES District | Santa Barbara CA
- Bonita Vista HS Building and Site Improvement CE, Sweetwater Union HSD | Chula Vista CA
- Castle Park HS Building & Site Improvements NOE, Sweetwater Union HSD | Chula Vista CA

EDUCATION

- BA, Environmental Science, University of California, Irvine
- Certificate in CEQA Practice, University of California, San Diego

AFFILIATIONS

- Association of Environmental Professionals (AEP)

Team member since 2024

PLACEWORKS

CHRISTHI MROSLA
Associate
cmrosla@placeworks.com

- Mar Vista Academy Building Site Improvements NOE, Sweetwater USD | Chula Vista CA
- Granger Junior HS Building Site Improvements NOE, Sweetwater USD | Chula Vista CA
- Garden Valley ES New California and Administrative Building Project NOE, Twin Rivers USD | Sacramento County CA
- Liberty MS and Career Technical Education Project EIR, Liberty School District | Sonoma County CA

PRIOR EXPERIENCE

- Church of the Woods EIR | Unincorporated San Bernardino County CA
- Cottonwood and Edgemont Industrial Warehouse IS/MND | Moreno Valley CA
- Banana and Rose Commerce Center Industrial Warehouse EIR Addendum | Fontana CA
- Patterson Commerce Center Industrial Warehouse IS/MND | Perris CA

SPEAKING ENGAGEMENTS

- Panelist/ 2024 Association of Environmental Professional Career Panel/ University of California, Irvine

LEADERSHIP AND COMMUNITY

- Mentor, UC Irvine Physical Sciences Undergrad Mentorship Program, 2022–2023
- Volunteer, Irvine Ranch Conservancy, 2018

AWARDS

- Dean's Honor List, UCI, 2015–16

Architectural
Resources Group

EVANNE ST. CHARLES, LFA, LEED AP O+M

Senior Associate | Architectural Historian & Preservation Planner

Evanne is an Architectural Historian and Preservation Planner in ARG's Los Angeles office with twelve years of experience in historic resource management. She has managed and contributed to a range of historic preservation projects, including historic structure reports, landmark nominations, historic resources surveys, California Environmental Quality Act (CEQA) compliance documentation, Mills Act Property Tax Abatement Program administration, and federal historic preservation tax credit applications. Evanne is also actively involved with the Association for Preservation Technology International (APT) as a co-chair of the APT's Technical Committee on Sustainable Preservation.

Relevant Project Experience

- 110 Holly Street, Secretary of the Interior's Standards Compliance Memorandum for Building Rehabilitation, Pasadena, CA
- 900 E. Broadway Historic Resource Assessment and Project Impacts Analysis, Glendale, CA
- 1411 N. Broadway Historic Resource Assessment and Project Impacts Analysis, Santa Ana, CA
- 1828 Ocean Avenue/1920 Ocean Front Walk, Evaluation of Impacts to Historic Resources under CEQA, Santa Monica, CA
- 3100 S. Figueroa Project, Historical Resources Technical Report, Los Angeles, CA
- 8601 S. Vermont Avenue, Historical Resource Assessment and Project Impacts Analysis, Los Angeles, CA
- Chavez Gardens Project, Secretary of the Interior's Standards Compliance Review, Los Angeles, CA
- Hotel El Roblar, Historic Resources Report and Project Impacts Analysis, Ojai, CA
- Lassen and Mason Redevelopment, Historical Resources Assessment Report and Project Impacts Analysis, Los Angeles, CA
- Lucas Museum of Narrative Art EIR, Historical Resources Technical Report, Los Angeles, CA
- Miramar Beach Resort and Bungalows Affordable Employee Housing, Market Rate Housing and Resort-Visitor Serving Commercial Project, Historical Resources Technical Report, Montecito, CA
- Mission Place Development, Evaluation of Impacts to Historic Resources under CEQA, South Pasadena, CA
- Norton Simon Museum, Secretary of the Interior's Standards Compliance Memorandum for Exterior Improvement Project, Pasadena, CA
- Pasadena Conservatory of Music, Secretary of the Interior's Standards Compliance Memorandum for Learning Center Addition, Pasadena, CA
- Sepulveda and Centinela Project SCEA, Historical Resources Technical Report, Los Angeles, CA

Education

Master of Science, Historic Preservation, University of Oregon, Eugene

Bachelor of Arts, Art History with Architecture and Environment Emphasis; Bachelor of Arts, Geography, University of California, Santa Barbara

Meets the *Secretary of the Interior's Professional Qualifications Standards* in Architectural History

Memberships

Association for Preservation Technology International (APT), Member

Western Chapter of the Association for Preservation Technology (WCAPT), Member

APT Technical Committee on Sustainable Preservation (TC-SP), Co-Chair

APT TC-SP, OSCAR Focus Group, Co-Chair

Los Angeles Conservancy, Member

California Preservation Foundation, Member

Docomomo US, Member

Architectural
Resources Group

KATIE E. HORAK

Principal | Architectural Historian & Preservation Planner

Katie is a Los Angeles-area native and Principal in ARG's Los Angeles office. She has nearly twenty years experience in the field of historic resource management in both the public and private sectors. Katie is a recognized leader in the industry, bringing creative and innovative solutions to complex issues related to historic site documentation, management, and adaptive re-use. Katie brings expertise in policies related to the California Environmental Quality Act (CEQA), Secretary of the Interior's Standards compliance, and provides strategic guidance regarding project approvals, entitlements, and outreach/consensus building.

Relevant Project Experience

- Century Plaza Hotel, Historical Resources Technical Report under CEQA, Los Angeles, CA
- California State University Long Beach, Historic Preservation Consulting, Long Beach, CA
- The Factory at Robertson Lane, Historic Preservation Consulting and Technical Report under CEQA, West Hollywood, CA
- Claremont McKenna College, Historical Resources Technical Report under CEQA, Claremont, CA
- Lucas Museum of Narrative Art EIR, Historical Resources Technical Report, Los Angeles, CA
- Pomona College Master Plan EIR, Historical Resources Technical Report under CEQA, Claremont, CA
- Wayfarers Chapel, Historic Structures Report, National Historic Landmark Nomination, and Building Disassembly, Rancho Palos Verdes, CA
- University of California, San Diego, Humanities & Social Sciences Building Repair, San Diego, CA
- City of Los Angeles, Historical Housing and Land Use Study, Los Angeles, CA
- Colony 29, Rehabilitation Study and Concept Design, Palm Springs, CA
- CBS Television City, Historic Consulting, Los Angeles, CA
- Ocotillo Lodge, Historic Paint Palette Study, Palm Springs, CA
- Inspiration Heights Historic District National Register Nomination, San Diego, CA
- Title Insurance and Trust Company Building, Rehabilitation, Seismic Upgrade, and Historic Preservation Certification Application for Federal Historic Tax Credits, Los Angeles, CA
- Santa Fe Railway Depot, Historic Preservation Certification Application for Federal Historic Tax Credits, Redlands, CA (ongoing)
- City Transfer and Storage Company Warehouse, Historic Preservation Certification Application for Federal Historic Tax Credits, Redlands, CA
- Harrower Laboratory and Clinic, Rehabilitation Study, Glendale, CA

Education

Master of Heritage Conservation, University of Southern California

University of Oregon, Eugene Historic Preservation Field School in Canova, Italy

Bachelor of Arts, Art (Painting/Drawing), Whitworth College, Spokane, Washington

Meets the *Secretary of the Interior's Professional Qualifications Standards* in Architectural History

Memberships

President, Docomomo US

Founding President, Docomomo US, Southern California Chapter

Los Angeles Conservancy

Society of Architectural Historians, Southern California Chapter

Los Angeles Headquarters Association (LAHQ)

Academic Involvement

Adjunct Associate Professor, University of Southern California.

Current courses taught: *Introduction to Historic Site Documentation*, and *Advanced Documentation: Historic Resources Surveys*

June 2025 | Mitigation Monitoring Reporting Program
State Clearinghouse No. 2014051061

LA COUNTY GENERAL HOSPITAL & WEST CAMPUS STABILIZATION PROJECT

for County of Los Angeles

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County of Los Angeles
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Mitigation Monitoring and Reporting Program

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide a vehicle by which to identify and monitor previously adopted mitigation measures from the LAC+USC Medical Center Campus Master Plan Environmental Impact Report (EIR) (2014 Master Plan EIR) prepared for the LAC+USC Medical Center Master Plan (Approved Project) that are applicable to the LA County General Hospital & West Campus Stabilization Project EIR Addendum (2025 Addendum) prepared for the LA County General Hospital & West Campus Stabilization Project (Proposed Stabilization Project). The Los Angeles County Board of Supervisors, as governing body of the County of Los Angeles, approved the 2014 Master Plan Project, Findings of Fact and Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program on November 18, 2014 (State Clearinghouse [SCH] 2014051061). The adopted MMRP was prepared in conformance with Section 21081.6 of the Public Resources Code, which states:

> (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
>
> (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.
>
> (2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

It should be noted that subsequent to the certification of the 2014 Master Plan EIR, two addenda were prepared that analyzed refinements to the Approved Project. The first Addendum to the 2014 Master Plan EIR was prepared for the Recuperative Care and Crisis Residential Care Centers Project in 2017 (2017 Addendum). The Los Angeles County Board of Supervisors certified the 2017 Addendum on December 19, 2017. The second Addendum to the 2014 Master Plan EIR was prepared for the Psychiatric Subacute Facility Mental Health Urgent Care Center Residential Withdrawal Management Facility Project in 2023 (2023 Addendum). The Los Angeles County Board of Supervisors certified the 2023 Addendum on December 19, 2023. Neither the 2017 Addendum nor the 2023 Addendum modified the adopted mitigation measures or proposed new mitigation measures.

Mitigation Monitoring and Reporting Program

On June 17, 2025, the Los Angeles County Board of Supervisors certified the 2025 Addendum (third Addendum) to the 2014 Master Plan EIR that evaluates implementation of the Proposed Stabilization Project. The 2025 Addendum identifies previously adopted mitigation measures from the 2014 Master Plan EIR that are applicable to the Proposed Stabilization Project's modifications to the Approved Project. No changes to any of the previously adopted mitigation measures are necessary. This document specifies the mitigation measures that are applicable to the Proposed Stabilization Project to the following topics:

- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources

The previously adopted mitigation measures that are not directly applicable to the 2025 Addendum still remain valid and applicable to the 2014 Master Plan EIR and 2017 and 2023 Addenda.

Applicable previously adopted mitigation measures (MM) have been categorized in matrix format, as shown in Table 1, *Mitigation Monitoring and Reporting Program*. The mitigation measures were included in the 2014 Master Plan EIR and adopted MMRP, with no changes. The matrix identifies the environmental factor, specific mitigation measures, schedule, responsible implementing party, and monitoring. The mitigation matrix will serve as the basis for scheduling the implementation of and compliance with all applicable mitigation measures.

Table 1 Mitigation Monitoring and Reporting Program

	Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
4.3 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.	County of Los Angeles and its contractors.	Pre-construction and construction.	County of Los Angeles.	1. Check construction specifications during preparation of construction bid packages to ensure use of low-VOC coatings are specified. 2. Periodically inspect construction sites, as necessary, to confirm use of low-VOC coatings.	None.
MM-AQ-2	To reduce NOx emissions during construction, the County (or its contractors) shall ensure that all offroad 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.	County of Los Angeles and its contractors.	Pre-construction and construction.	County of Los Angeles.	1. Check construction specifications during preparation of construction bid packages to ensure use of EPA Tier 4 Interim engines have been specified. 2. Periodically inspect construction sites, as necessary, to confirm use of EPA Tier 4 Interim engine equipment.	None.
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	County of Los Angeles and its contractors.	Pre-construction and construction.	County of Los Angeles.	1. Check construction specifications during preparation of construction bid packages to ensure all measures listed as part of MM-AQ-3 have been specified. 2. Periodically inspect construction sites, as necessary, to confirm	None.

Mitigation Monitoring and Reporting Program

Table 1 Mitigation Monitoring and Reporting Program

	Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
	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 on 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.				compliance with signage, equipment maintenance, and truck delivery mitigation measures. 3. Check once during construction to confirm a carpool program has been implemented by construction contractor.	
4.4 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:	County of Los Angeles.	Pre-construction.	County of Los Angeles.	1. Check once prior to construction to confirm that a qualified biologist has been hired and is under contract to conduct preconstruction surveys, installation of exclusion devices, and monitoring of roost tree removal or trimming. 2. Check once prior to construction to confirm that pre-construction surveys	CDFW.

Table 1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
▪ 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: ▪ Non-maternity roost trees should ideally be removed or trimmed in the fall between September 16 and October 31. If the removal of non-				have been conducted. 3. Check periodically, as necessary, to confirm that no construction occurs near identified roosts during maternity period. 4. If exclusion devices are proposed, check to ensure they have been installed by or under the supervision of an experienced bat biologist. 5. Check to confirm that removal of roost trees is monitored by a qualified biologist.	

Mitigation Monitoring and Reporting Program

Table 1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
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. ○ On Day 1, for trees with cavities, crevices, and exfoliating bark, and that are found to support roosting bats, Step 1 would be the removal of branches and limbs with no cavities. These limbs shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree, which may not have been detected during the preconstruction survey, will either abandon the roost immediately (rarely) or, after emergence, will avoid returning to the roost. For foliage roosting bats, Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. On Day 2, under the supervision of a qualified biological monitor familiar with the life history of subject bat					

Table 1 Mitigation Monitoring and Reporting Program

	Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
	species, the tree may be removed. ○ Qualified biologists should search all downed roost trees for dead and injured bats. The presence of dead or injured bats that are species of special concern shall be reported to CDFW. ▪ Non-maternity roost trees should ideally be removed or trimmed in the fall between September 16 and October 31. If the removal of non-maternity roost trees cannot be timed to occur within this period, tree trimming and removal of non-maternity roost trees shall be timed to avoid periods of inclement or unseasonably cold weather to avoid impacts on bats in torpor (a period of seasonal inactivity). In all circumstances, qualified biologists shall monitor non-maternity tree removal.					
MM-BIO-2	The County shall avoid the nesting season for birds or conduct preconstruction nesting bird surveys if construction activities are carried out during the nesting season. To ensure compliance with the MBTA and similar provisions under Sections 1600–1616 of the California Fish and Game Code, the County of Los Angeles, through the general contractor, shall conduct all vegetation removal during the	County of Los Angeles.	Pre-construction.	County of Los Angeles.	1. Check once prior to construction to confirm that a qualified biologist has been hired and is under contract to conduct preconstruction surveys, and if nests are found,	None.

Mitigation Monitoring and Reporting Program

non-breeding season, between September 1 and February 14, or implement the following: ▪ 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: ▪ 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,				a buffer around the nests has been flagged and established. 2. Check once prior to construction to confirm that pre-construction surveys have been conducted. 3. Check periodically, as necessary, to confirm that no construction occurs near identified nests during the breeding season. 4. If nests have been identified, check to ensure they have been flagged and that no construction activities occur within the buffer zone of the nest, until the qualified biologist has determined that the young have fledged or that the nest is no longer active. 5. Check to confirm that the qualified biologist has submitted results of the pre-construction survey to the County of Los Angeles Department of Public Works for review and approval of the recommended nest buffer area.	

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.					

Mitigation Monitoring and Reporting Program

Table 1 Mitigation Monitoring and Reporting Program

	Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
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.	County of Los Angeles.	Pre-construction.	County of Los Angeles.	1. Check once prior to construction to confirm that a qualified arborist has been hired and is under contract to inventory native oak trees on the proposed project site to support any required oak tree permit request application, and prepare an oak tree report. 2. Check once prior to construction to confirm that a pre-construction oak tree inventory has been conducted. 3. Check once prior to construction to confirm that an oak tree report has been prepared by a qualified arborist. The oak tree report shall include information about the protection of oak trees to remain adjacent to construction activities as well as a proposed replanting plan, in accordance with the County's replacement ratio. 4. Check once prior to tree removal to confirm that the necessary oak tree permits have been filed and requested with the County Department of Regional Planning.	Department of Regional Planning.

Table 1 Mitigation Monitoring and Reporting Program

Mitigation Measure		Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
4.5 CULTURAL RESOURCES						
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.	County of Los Angeles and its contractors.	Pre-construction and during construction.	County of Los Angeles.	1. Check once prior to construction to confirm that a qualified historic preservation specialist has been hired and is under contract to review the proposed types of street and walkway lighting, benches, bollards, and other street/landscape furniture, so that it enhances the setting of General Hospital and provides sufficient illumination, and is complaint with the Secretary of the Interior's Standards. 2. Check construction specifications during preparation of construction bid packages to ensure use of appropriate street and walkway lighting, benches, bollards, and other street/landscape furniture per recommendations by the qualified historic preservation specialist and the Secretary of the Interior's Standards has been specified. 3. Periodically inspect construction sites, as necessary, to confirm use of appropriate street and walkway lighting, benches, bollards, and other	None.

Mitigation Monitoring and Reporting Program

Table 1 Mitigation Monitoring and Reporting Program

	Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
					street/landscape furniture per recommendations by the qualified historic preservation specialist and the Secretary of the Interior's Standards.	
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.	County of Los Angeles.	Prior to any construction activity within the setting of General Hospital that could adversely affect this historic resource.	County of Los Angeles.	1. Check once prior to construction to confirm that a qualified architectural historian, historian, or historical architect has been hired and is under contract to prepare an updated DPR 523 form identifying the contributing and non-contributing features of the historic General Hospital and its setting. 2. Check once prior to construction activity within the setting of General Hospital that could adversely affect this historic resource to confirm that the updated DPR 523 form identifying the contributing and non-contributing features of the historic General Hospital and its setting has been prepared.	None.
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	County of Los Angeles and its contractors.	Pre-construction and during construction.	County of Los Angeles.	1. Check once prior to construction to confirm that a qualified archaeologist has been hired and is under contract to determine which areas on the campus shall	None.

Table 1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
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.				require cultural resources monitoring during initial ground disturbance. 2. Check once prior to construction to confirm that the qualified archaeologist has reviewed the project excavation and grading plans and determined the location of any construction activities that are likely to encounter subsurface sediments with archaeological sensitivity. 3. Check periodically during construction, as necessary, to confirm that a qualified archaeologist is monitoring all initial ground-disturbing activities at sites previously determined likely to encounter subsurface sediments with archaeological sensitivity. 4. Spot-check monitoring periodically during all construction, on a schedule determined by the project archaeologist.	

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	Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
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 paleontological personnel,	County of Los Angeles and its contractors.	Pre-construction and during construction.	County of Los Angeles.	1. Check once prior to construction to confirm that a qualified vertebrate paleontologist with a graduate degree and more than 10 years of experience has been hired and is under contract to determine which areas on the campus shall require paleontological monitoring during initial ground disturbance. 2. Check once prior to construction to confirm that the qualified paleontologist has reviewed the project excavation and grading plans and determined the location of any construction activities, such as excavation for the proposed parking garages, which are likely to encounter subsurface sediments with high paleontological sensitivity. 3. Check periodically during construction, to confirm that the qualified paleontologist is monitoring very shallow surficial excavations (i.e., less than 5 feet in depth) within areas of previous disturbance or areas of Quaternary younger alluvial deposits on a part---time basis, to ensure that	None.

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Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
determined to have a low potential for containing fossil resources. The paleontological 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).				underlying sensitive units (i.e., Quaternary older alluvium) are not adversely affected. Areas consisting of artificial fill materials shall not require monitoring. 4. Check periodically during construction, to confirm that the qualified paleontologist is monitoring excavations for the project that take place in Quaternary older alluvial deposits or within Fernando or Puente Formation bedrock, on a full-time basis. 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. 5. Check periodically to confirm the qualified paleontologist has recovered any encountered fossil material per the protocol listed in this Measure MM-CR-9 and if any fossils have been	

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	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.				collected during construction, that they have been transported to a paleontological laboratory for processing. 6. Check periodically to confirm any found fossils from the project site sent to a paleontological laboratory have been 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. 7. Check once to confirm that the qualified paleontologist has prepared, for the County of Los Angeles, a Report of Findings with an appended itemized inventory of specimens, and a confirmation of the curation of recovered specimens into an established, accredited museum repository.	
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	County of Los Angeles and its contractors.	Pre-construction and during construction.	County of Los Angeles.	1. Check construction specifications during preparation of construction bid packages to ensure all measures listed as part of MM-CR-10 have been.	Native American Heritage Commission.

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	Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
	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				2. Check as necessary during construction, to confirm that in the event that human remains are uncovered, construction has been halted in the area of discovery and the area protected per State Health and Safety Code Section 7050.5. Confirm that the County coroner has been notified to determine the origin and disposition of the human remains pursuant to PRC Section 5097.98. 3. Check periodically during construction, as necessary, to confirm the NAHC has been notified within 24 hours and all coordination protocol listed under this mitigation measure has been followed, in the event that the coroner determined the remains to be Native American.	
4.7 GEOLOGY AND SOILS						
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	County of Los Angeles and its contractors.	Pre-construction and during construction.	County of Los Angeles.	1. Check construction specifications during preparation of construction bid packages to confirm all measures listed as part of MM-GEO-2 have been specified.	None.

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	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.				2. Periodically inspect construction sites, as necessary, to confirm compliance with surface drainage design and stormwater runoff mitigation per the SWPPP and Stormwater General Permit, as well as implementation of BMPs.	
	MM-CR-9 shall apply.	See MM-CR-9.	See MM-CR-9.	See MM-CR-9.	See MM-CR-9.	See MM-CR-9.
4.8 GREENHOUSE GAS EMISSIONS						
	MM-AQ-2 and MM-AQ-3 shall apply.	See MM-AQ-2 and MM-AQ-3.	See MM-AQ-2 and MM-AQ-3.	See MM-AQ-2 and MM-AQ-3.	See MM-AQ-2 and MM-AQ-3.	See MM-AQ-2 and MM-AQ-3.
4.9 HAZARDS AND HAZARDOUS MATERIALS						
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	County of Los Angeles and its contractors.	Pre-construction and during construction.	County of Los Angeles.	1. Check once prior to construction to confirm that a qualified Cal/OSHA-certified asbestos consultant has been hired and is under contract to conduct asbestos-containing materials surveys and evaluations in buildings that are to be demolished or renovated. 2. Check once prior to construction to confirm that a qualified CDHP-certified inspector/assessor is has been hired and is under contract to conduct lead-based paint surveys and evaluations in	South Coast Air Quality Management District.

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	abatement plan would be prepared by the CDPH-certified project monitor or supervisor, and demolition activities would be performed by CDPH-certified workers.				buildings that are to be demolished or renovated. 3. Check once prior to construction to confirm that pre-construction surveys and evaluations for asbestos-containing materials and lead-based paint have been conducted, and if necessary, that abatement measures and a lead abatement plan were prepared. 4. Check construction specifications during preparation of construction bid packages to confirm that, if determined necessary as part of the asbestos-containing materials and lead-based paint pre- construction surveys and evaluations, abatement measures and/or the requirement of demolition by CDPH-certified workers, have been specified. 5. Periodically inspect demolition activities to ensure compliance with specified asbestos and lead-based pain removal protocols.	
MM-HAZ-2	Prior to start of construction, an additional investigation of the leaking underground	County of Los Angeles.	Pre-construction.	County of Los Angeles.	1. Check once prior to construction to confirm that an	City of Los Angeles Fire Department's

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	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.				additional investigation of the leaking underground storage tank at 1200 North State Street has been conducted to determine its potential impact on project site development. 2. Check once prior to construction to confirm that a certified geologist or industrial hygienist has been hired and is under contract to specify an appropriate course of action if environmental concerns are discovered as a result of the investigation of the leaking underground storage tank at 1200 North State Street. The course of action for identified environmental concerns may involve removal and disposal of contaminated materials, and remediation of the area of concern. 3. Check once, prior to construction to confirm that any contaminated materials have been removed and disposed of, or the site has been remediated.	Bureau of Fire Prevention and Public Safety.
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	County of Los Angeles.	Pre-construction.	County of Los Angeles.	1. Check once prior to construction to confirm that additional investigations at the former suspected locations of	City of Los Angeles Fire Department's Bureau of Fire

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	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.				underground storage tanks (USTs) and the former boilers and powerhouse have been conducted to determine their potential impact on project site development. 2. Check once prior to construction to confirm that a certified geologist or industrial hygienist has been hired and is under contract to specify an appropriate course of action if environmental concerns are discovered as a result of the investigations of the former suspected locations of USTs and the former boilers and powerhouse. The course of action for identified environmental concerns may involve removal and disposal of contaminated materials, and remediation of the area of concern. 3. Check once, prior to construction to confirm that any contaminated materials have been removed and disposed of, or the site has been remediated.	Prevention and Public Safety.
4.10 HYDROLOGY AND WATER QUALITY						
MM-HYD-1	Construction activity (clearing, grading, excavation, stockpiling, and reconstruction of existing facilities involving removal and	County of Los Angeles and its contractors.	Pre-construction and during construction.	County of Los Angeles.	1. Check construction specifications during preparation of construction bid	Regional Water Quality Control Board.

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	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.				packages to ensure all measures listed as part of MM-HYD-1 have been specified. 2. Periodically inspect construction sites, as necessary, to confirm compliance with the recommendations in the SWPPP, the Construction Activities Storm Water General Permit, and erosion/sediment control plan.	
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,	County of Los Angeles and its contractors.	Final Design and construction.	County of Los Angeles.	1. Check final design specifications during preparation of final design bid packages to ensure all LID measures listed as part of MM-HYD-2 have been specified to be implemented, as practicable. 2. Periodically inspect construction sites, as necessary, to confirm	None.

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	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.				compliance with identified practicable measures.	
MM-HYD-5	During and after construction, positive drainage shall be provided to direct water away from buildings and foundations. Where positive drainage is not provided, area drains shall be used to drain depressions or low spots that are not part of the designed LID features. Area drains shall not be placed next to buildings or in contact with buildings. All area drains and LID features shall be located, at a minimum, 8 feet away from building foundations or as directed in the International Building Code or other regulatory requirements. Roof drainage shall be controlled and directed to proper drainage	County of Los Angeles and its contractors.	Final Design and construction.	County of Los Angeles.	1. Check final design specifications during preparation of final design bid packages to ensure all measures listed as part of MM-HYD-5 have been specified to be implemented, as practicable. 2. Periodically inspect construction sites, as necessary, to confirm compliance with identified practicable measures.	None.

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	devices in an acceptable manner or to LID features.					
4.13 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	County of Los Angeles and its contractors.	Pre-construction and during construction.	County of Los Angeles.	1. Check construction specifications during preparation of construction bid packages to ensure all measures listed as part of MM-NOI-1 have been specified. 2. Periodically inspect construction sites, as necessary, to confirm compliance with construction hours, equipment maintenance, and noise-producing construction activity mitigation measures.	None.

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Mitigation Measure	Party Responsible for Implementation	Phase	Party Responsible for Monitoring	Monitoring Activity/Period/Frequency	Outside Agency Coordination
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					

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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					

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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 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.					

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	▪ To the extent possible, haul roads should not be designated through noise-sensitive areas					
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.	County of Los Angeles and its contractors.	Design.	County of Los Angeles.	1. Check final design specifications during preparation of final design bid packages to confirm that an acoustical consultant has been hired and is under contract to evaluate the design and provide recommendations, as necessary to comply with Chapter XI of the City of Los Angeles Municipal Code for any proposed facility that would introduce new mechanical equipment as detailed in this Mitigation Measure MM-NOI-4, as practicable. 2. Check to confirm that the acoustical consultant has developed recommendations in accordance with Chapter XI of City of Los Angeles Municipal Code and that those recommendations have been incorporated in project plans. 3. Periodically inspect construction sites, as necessary, to confirm compliance with design and recommendations of the	None.

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					acoustical consultant, as practicable.	
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.	County of Los Angeles and its contractors.	Pre-construction and construction.	County of Los Angeles.	1. Check construction specifications during preparation of construction bid packages to confirm limits on pile driving and operation of heavy construction equipment near sensitive receptors, as described in this mitigation measure, have been specified. 2. Periodically inspect construction sites, as necessary, to confirm compliance with measures limiting the use of pile driving and operation of heavy construction equipment within 111 feet of on-site or off-site sensitive receptors, to the extent practicable.	None.
4.15 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.	County of Los Angeles and its contractors.	Pre-construction and construction.	County of Los Angeles.	1. Check construction specifications during preparation of construction bid packages to confirm notification and coordination requirements with public safety providers, as described in this mitigation measure, have been specified.	City of Los Angeles Fire Department, City of Los Angeles Police Department, Los Angeles County Sheriff's Department.

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					2. Periodically check with contractor, as necessary, to confirm compliance with this measure.	
4.17 TRANSPORTATION						
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	County of Los Angeles and its contractors.	Pre-construction and construction.	County of Los Angeles.	1. Check construction specifications during preparation of construction bid packages to ensure all measures listed as part of MM-TRAF-1 are specified. 2. Periodically inspect construction sites, as necessary, to confirm project traffic control measures have been implemented, as practicable.	Los Angeles Department of Transportation, City of Los Angeles Fire Department, City of Los Angeles Police Department, Los Angeles County Sheriff's Department.

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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.					

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▪ Work with the City of Los Angeles to maintain continuity and operation of existing pedestrian and bicycle facilities during construction.					
4.18 TRIBAL CULTURAL RESOURCES					
MM-CR-8 and MM-CR-10 shall apply.	See MM-CR-8 and MM-CR-10.	See MM-CR-8 and MM-CR-10.	See MM-CR-8 and MM-CR-10.	See MM-CR-8 and MM-CR-10.	See MM-CR-8 and MM-CR-10.

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