CEQA FINDINGS OF FACT
REGARDING THE FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES COUNTY
GENERAL HOSPITAL CAMPUS MASTER PLAN PROJECT
STATE CLEARINGHOUSE NO. 2014051061

I. INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of a project pursuant to Section 15091 and Section 15093 of the State CEQA Guidelines and Section 21081 of the California Public Resources Code (PRC). This document provides the findings required by CEQA. The potential environmental effects of the proposed Los Angeles County General Hospital Campus Master Plan Project (Proposed Project) have been analyzed in a Draft Subsequent Environmental Impact Report (Draft SEIR) (State Clearinghouse [SCH] 2014051061) dated May 2026. A Final Subsequent Environmental Impact Report (Final SEIR) has also been prepared that incorporates the Draft SEIR and contains comments received on the Draft SEIR during the public review period and public informational meeting, responses to the individual comments, revisions to the Draft SEIR including any clarifications based on the comments and the responses to the comments, and the Mitigation Monitoring and Reporting Program (MMRP) for the Proposed Project. The Final SEIR as referred to in these findings is inclusive of both the Draft SEIR and Final SEIR. This document provides the findings required by CEQA for approval of the Proposed Project.

The lead agency is responsible for the adequacy and objectivity of the EIR. The Lead Agency pursuant to State CEQA Guidelines Section 15050 is the County of Los Angeles (County). The Department of Economic Opportunity (DEO) is carrying out the SEIR process on behalf of the County. The County, as lead agency, has exercised its independent judgment and analysis in its review of the Draft SEIR and Final SEIR.

STATUTORY REQUIREMENTS FOR FINDINGS

CEQA (Public Resources Code (PRC) Section 21000, et seq.) and the State CEQA Guidelines (14 California Code of Regulations Sections 15000, et seq.) promulgated thereunder, require the environmental impacts of a project be examined before a project is approved. Specifically, regarding findings, State CEQA Guidelines Section 15091 provides:

> (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings

for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

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

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

(b) The findings required by subsection (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in section 15091(a)(1) may include a wide variety of measures or actions as set forth in State CEQA Guidelines Section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments.

CERTIFICATION

Having received, reviewed, and considered the SEIR for the Proposed Project, as well as other information in the record of proceedings on this matter, the County, as the lead agency, adopts and certifies the following Findings of Fact (Findings). The Findings set forth the environmental and other bases for current and subsequent discretionary actions to be undertaken by the County and responsible agencies for the implementation of the Proposed Project.

In addition, the County hereby make findings pursuant to and in accordance with Section 21081 of the California Public Resources Code and State CEQA Guidelines Sections 15090 and 15091 and hereby certifies that:

(1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the Final EIR.

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

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

SUBSEQUENT ENVIRONMENTAL REPORT AND DISCRETIONARY ACTIONS

The Final SEIR addresses the direct, indirect, and cumulative environmental effects associated with adoption of the Proposed Project. As a program-level SEIR, the Draft and Final SEIR evaluates a reasonable and likely maximum development that could be developed based on the

level of information that is currently available. The Draft and Final SEIR provides the environmental information necessary for the County to make a final decision on the anticipated discretionary actions related to the Proposed Project. Later activities would also be required to adhere to applicable regulations, and standards and mitigation measures identified as part of the Final SEIR and MMRP. Review of proposed future projects under the proposed Master Plan would be reviewed to determine compliance with State CEQA Guidelines Section 15168 and other applicable provisions of CEQA. Discretionary actions to be considered by the County include, but are not limited to, the following:

- Certification of the Los Angeles County General Hospital Campus Master Plan Subsequent Environmental Impact Report
- Approval and adoption of the Los Angeles County General Hospital Master Plan
- Adoption of the Mitigation Monitoring and Reporting Program for the Los Angeles County General Hospital Campus Master Plan

Additional future discretionary actions to be considered by the County could include the following:

- Approval of amendments to the Master Plan
- Approval of Ground leases and related agreement(s)
- Approval of actions related to implementation of the Master Plan or approval of future proposed projects under the Master Plan.

The County anticipates that other public agencies with potential discretionary authority related to the Proposed Project would rely on the Final SEIR as the basis for their CEQA determinations.

II. PROCEDURAL COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT

The County published a Draft SEIR and commenced the public review period on May 15, 2026. A Final SEIR was completed in September 2026 in compliance with CEQA requirements. The Final SEIR has been prepared in accordance with CEQA and the State CEQA Guidelines. As authorized in State CEQA Guidelines Section 15084(d)(2), the County retained a consultant to assist with the preparation of the environmental documents, which was subject to review and direction of the County. County staff, representing the lead agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The Final SEIR reflects the County's independent analysis and judgement. The key milestones associated with the preparation of the SEIR are summarized below. As presented below, extensive public involvement and agency notification efforts were conducted to solicit input on the scope and content of the SEIR and to solicit comments on the results of the environmental analysis presented in the Draft SEIR.

ENVIRONMENTAL REVIEW PROCESS

In conformance with CEQA, the State CEQA Guidelines, and the County of Los Angeles Environmental Document Reporting Procedures and Guidelines[1], the County conducted an extensive environmental review of the Proposed Project. The environmental review process included the following.

Scoping Process

- The County determined that a Subsequent EIR (SEIR) would be the appropriate environmental document for the Proposed Project because the Proposed Project represents a substantial change from the Los Angeles County + University of Southern California (LAC+USC) Medical Center Campus Master Plan EIR (2014 Master Plan EIR, State Clearinghouse No. 2014051061) that was certified on November 18, 2014, by the Los Angeles County Board of Supervisors, resulting in major revisions. Substantial changes occur with respect to the circumstances under which the Proposed Project will be undertaken, which required major revisions to the prior EIR. Lastly, new information of substantial importance that could not have been known at the time the prior EIR was certified would result in one or more significant effects not previously discussed and would result in an increased severity in impacts as defined in the prior EIR.
- The County issued a Notice of Preparation (NOP) and Notice of Public Scoping Meeting. The NOP was provided in both English and Spanish.
- The NOP comment period was from September 26, 2025 to October 27, 2025. Following requests from the public during the comment period, the public review period was extended to November 21, 2025.
- Pursuant to CEQA Guidelines Section 15082, copies of the NOP were available for public review at the Los Angeles County Wellness Center, City Terrace Library, Chinatown Branch Library, El Sereno Branch Library, Lincoln Heights Branch Library, Anthony Quinn Library, Malabar Branch Library, and the County of Los Angeles Department of Economic Opportunity website. The NOP was sent via certified mail to 81 recipients and via email to an distribution list of approximately 11 recipients. County DEO social media was used to publicize the CEQA process. The NOP was transmitted to the State Clearinghouse and County Clerk and was distributed to State and local agencies, Native American tribes, and/or those who previously requested such notice.
- The Centennial Partners team also distributed the NOP via email to a list of approximately 1,085 recipients that included stakeholders, individuals, groups, and agencies that have been involved in the process and/or signed up to be on an informational email list.

[1] County of Los Angeles, Environmental Document Reporting Procedures and Guidelines (1987).

- During the scoping process the County invited the public, public agencies and others to participate in a virtual public scoping meeting (Zoom webinar) on October 8, 2025. At the meeting the County provided a presentation with information about the Proposed Project known at the time and an overview of the CEQA process. All information was presented in simultaneous English and Spanish.
- A total of 10 written comments and 5 verbal comments were received during the public scoping meeting. Table 1-1, *Notice of Preparation and Scoping Meeting*, of the Draft SEIR describes the issues raised during scoping and where they are addressed in the Draft SEIR. All comments received during the scoping process are included as Appendix A to the Draft SEIR.

AB52 Tribal Consultation

In compliance with the requirements set forth in AB 52, on September 26, 2025, the County provided formal notification of the Proposed Project and sent an invitation for consultation to 12 Native American tribes (Tribe(s)). The tribes which were notified include those that are on the County's request for notification list, pursuant to PRC Section 21080.3.1, which includes tribes that have formally requested notification through the County's Department of Regional Planning, when the County, as the lead agency under CEQA, considers projects in the geographic area that is traditionally and culturally affiliated with the tribe. The County additionally contacted Native American Heritage Commission (NAHC) and received the NAHC list of tribes that are traditionally and culturally affiliated with the geographic area of the Project Site on July 25, 2025. The lists were cross-referenced and were substantially coextensive; to the extent any tribe appeared on only one of the two lists, that tribe was included in the notification to ensure full compliance with AB 52. The County extended the 30-day period for tribes to request consultation from October 27, 2025 to November 21, 2025 to coincide with the extended scoping period. The notification letters were emailed and sent via certified mail to the following:

- Band of Mission Indians
- Cahuilla Band of Indians
- Fernandeño Tataviam Band of Mission Indians
- Gabrieleño Tongva–San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California
- Gabrielino/Tongva Nation
- Gabrielino–Tongva Tribe
- Gabrieleño Band of Mission Indians–Kizh Nation
- San Manuel Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians

- Soboba Band of Luiseno Indians
- Tejon Indian Tribe

On September 30, 2025 and November 4, 2025, a response email was received from the San Manuel Band of Mission Indians stating no consultation with this tribe was requested. On October 1, 2025 and October 23, 2025, a response email was received from the Fernandeño Tataviam Band of Mission Indians stating no consultation with this tribe was requested. On November 4, 2025, the Gabrieleño Band of Mission Indians–Kizh Nation requested to consult with the County on the Proposed Project via email. The remaining eight tribes did not provide response to the County. Appendix K, *Tribal Consultation Responses*, of the Draft SEIR describes the County's tribal consultation outreach efforts.

The County began consultation via email with representatives of the Gabrieleño Band of Mission Indians–Kizh Nation on November 19, 2025. The Kizh Nation provided recommended mitigation measures tailored to the tribe's cultural protocols on January 22, 2026 via email. The County provided suggested revisions to the provided mitigation measures on March 3, 2026 via email. On March 17, 2026, the tribe provided comments on the County's proposed revisions to the mitigation measures. The County has considered all information provided by the Kizh Nation during the consultation for the Proposed Project. After acting in good faith and in consideration of the Tribe's requests and multiple rounds of emails and edits to the draft mitigation measures, the County concludes that a reasonable effort has been put forth and the County and the tribe have been unable to reach a mutual agreement regarding the mitigation measure language (PRC Section 21080.3.2[b]). An email and letter were sent via certified mail to Mr. Andrew Salas of the Gabrieleño Band of Mission Indians—Kizh Nation on May 8, 2026, concluding consultation pursuant to PRC Section 21080.3.2(b). The County considered the information and recommendations provided by the Kizh Nation and incorporated appropriate mitigation measures into the Final SEIR and MMRP to address potential impacts to TCRs. Although the County and the Kizh Nation did not reach agreement on the final mitigation measure language, the County determined that the measures included in the Final SEIR are appropriate to address the identified TCR impacts. See Chapter 3.16, *Tribal Cultural Resources*, and Appendix K, *Tribal Consultation Responses*, of the Draft SEIR for details regarding the tribal consultation process.

A comment letter was received from the Gabrielino Tongva Indians of California Tribal Council tribe on May 19, 2026 during the 45-day public comment period on the Draft SEIR. Response to this letter is included in Chapter 2, *Response to Comments*, of the Final SEIR.

Draft SEIR Process

- The County prepared a Draft SEIR and supporting technical appendices, along with the Notice of Availability (NOA) and Public Information Meeting, which were made available for a 45-day public review period beginning May 15, 2026, and ending June 29, 2026. The NOA was provided in both English and Spanish. Section 1.3, *Environmental Review Process*, of the Draft SEIR describes the issues identified for analysis in the Draft SEIR. In compliance

with Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the County published the NOA and Notice of Completion (NOC) of the Draft SEIR. The NOA was noticed using the same distribution as the NOP, including additional recipients that requested notification.

- The NOA and NOC were transmitted to the State Clearinghouse and County Clerk and were distributed to State and local agencies, and/or those who previously requested such notice.
- An email blast announcing the NOA and Master Plan was provided to approximately 1,375 individuals via an email distribution list that was maintained and expanded over the years by the project team.
- A virtual public information meeting (Zoom webinar) was held on June 11, 2026. The meeting included a presentation with an overview of the Proposed Project and the contents of the Draft SEIR. All information was provided in simultaneous English and Spanish. An estimated 16 members of the public participated in the informational meeting.
- A total of 20 comments were received during the public comment period. Responses are included in Chapter 2, *Response to Comments*, of the Final SEIR. The comment letters received are as follows:
  - 8 letters from public agencies
    - Gabrieleño Band of Mission Indians–Kizh Nation
    - San Gabriel Valley Council of Governments
    - Los Angeles Unified School District
    - California Department of Transportation (Caltrans)
    - South Coast Air Quality Management District (AQMD)
    - Office of the Sheriff, Los Angeles County
    - City of Los Angeles Department of Transportation (LADOT)
    - California Highway Patrol
  - 3 letters from organizations/groups
    - Alma Family Services
    - Eastside LEADS
    - Los Angeles Conservancy
  - 8 verbal comments during the public information meeting
  - 1 written comment during the public information meeting

Final SEIR Process

- The County prepared a Final SEIR, which includes an introductory chapter, comments received on the Draft SEIR and responses to those comments, and revisions made to the Draft SEIR, consistent with State CEQA Guidelines Section 15132(d). The Final SEIR includes the Draft SEIR in its entirety.

- As a result of comments received on the Draft SEIR, the County has elected to modify and/or include additional mitigation measures in the Final SEIR and MMRP. In summary, changed mitigation measures are as follows:
  - Mitigation measures were updated to provide clarity on responsible implementing party (Project Applicant(s)/Contractor(s))
  - Mitigation Measure AIR-2 and AIR-4d were added to further ensure that operational criteria pollutant, toxic air contaminants, and/or GHG emissions are reduced to the extent feasible to reduce a significant impact that was already identified in the Draft SEIR.
  - Transportation measures were updated to reflect input provided by Caltrans on the Draft SEIR regarding potential improvements to Caltrans facilities to address hazardous safety queuing impacts.
- The County prepared this Findings of Fact, a Statement of Overriding Considerations under separate cover, and a Mitigation Monitoring and Reporting Program (MMRP).
- The Final SEIR was posted to the County website and provided directly to commenting agencies on October 9, 2026, and is available online at: https://opportunity.lacounty.gov/general-hospital/.
- A public meeting which included recommendations with respect to the proposed Project and SEIR was held before County of Los Angeles Board of Supervisors, the governing body of the County, on October 20, 2026.

ADDITIONAL PUBLIC OUTREACH

In addition to the public outreach process described above that was carried forth pursuant to the State CEQA Guidelines, the County and Centennial Partners team conducted outreach throughout development of the Master Plan. The community engagement was structured through a range of engagement types. This information is described in the Master Plan and included the following:

- 24 pop-up outreach events
- 26 forum presentations
- 102 small group meetings
- 16 Community Advisory Committee meetings
- 3 community at-large meetings
- 35 town hall meetings

Community Engagement was conducted regularly throughout the Master Plan development process and has not been limited to key milestones, providing for engagement with different stakeholders. Community engagement was carried out by the County's development partner, Centennial Partners, in collaboration with a network of stakeholders, which included community-based organizations, healthcare workers, labor groups, educational partners, and

neighborhood leaders, as well as individuals who interact with the Project Site on a daily basis. Outreach was conducted in multiple languages to engage with different audiences throughout east Los Angeles. The Applicant also maintains an active on-site presence, that includes a working office on the Project Site, which allows for regular interaction with those who use the Project Site daily.

A Community Advisory Committee (CAC) was established to review and provide input into the development of the Master Plan and included representatives from a range of local stakeholder groups. The CAC provides a forum for reviewing Master Plan materials, sharing feedback, and helping shape how information is communicated. Additionally, a Health Innovation Community Partnership (HICP) was established and facilitated engagement of healthcare providers, institutions, and community-serving organizations connected to the Project Site.

Several events were also held on the Project Site, providing opportunities for the larger community to interact with the Project Site. This includes distribution of salvaged bicycles from the General Hospital Building through two community giveaways, prioritizing families served by the Wellness Center and neighborhood youth. Multiple public tours of the General Hospital Building were also organized and co-led by staff from the Los Angeles Conservancy.

The Applicant continues to collaborate with community partners including organizations such as The Wellness Center, Alma Family Services, and Eastside LEADS Coalition. The Applicant proposes continued communication, public updates, and future workshops to ensure that community voices remain integrated as the Project Site evolves overtime. Additionally, coordination across County departments will also ensure that future development will support existing Project Site users.

RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the Proposed Project includes, but is not limited to, the following documents and other evidence:

- The NOP, NOA, and all other public notices issued by the County in conjunction with the Proposed Project
- The 2014 Los Angeles County + University of Southern California (LAC+USC) Medical Center Campus Master Plan EIR and related documents, including previously approved addenda to that EIR
- The Los Angeles County General Hospital Campus Master Plan
- The Draft SEIR and Final SEIR for the Proposed Project
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft SEIR
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft SEIR

- All written and verbal public testimony presented during a noticed public hearing for the Proposed Project
- The Mitigation Monitoring and Reporting Program
- The reports and technical memoranda included or referenced in the Draft SEIR and Final SEIR
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft SEIR and Final SEIR
- The Resolutions adopted by the County of Los Angeles Board of Supervisors in connection with the Proposed Project, and all documents incorporated by reference therein
- Matters of common knowledge to the County, including but not limited to federal, state, and local laws and regulations
- Any documents expressly cited in these Findings
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials that constitute the administrative record for the County's actions related to the Proposed Project are at the Los Angeles County DEO's main office (510 S. Vermont Avenue, 11th Floor, Los Angeles, CA 90020). The DEO's Program Manager is the custodian of the administrative record for the Proposed Project. Copies of these documents, which constitute the record of proceedings, are available upon request at the offices of the DEO. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and State CEQA Guidelines Section 15091(e).

PROJECT LOCATION

The Project Site encompasses approximately 81.9 acres[2] that make up the Los Angeles County General Hospital Campus (also referred to as the Campus). The Project Site consists of a main campus and four additional areas separated from the main campus by local roadways, which are referred to as the "non-contiguous areas" in the Draft SEIR. The approximately 71-acre main campus is located at 1200 State Street, on parcels of land owned by the County within the City of Los Angeles. The four non-contiguous areas of the campus are referred to as the College of Nursing and Allied Health, located directly across Mission Road; Restorative Care Village (RCV),

[2] The Project Site boundaries considered in the SEIR are the same as those described in the 2014 Master Plan EIR. The 2014 Master Plan EIR referenced varying acreage values in different chapters of the 2014 Master Plan EIR (e.g., approximately 76 acres in the Project Description Chapter [2014 Master Plan EIR page 2-1] and approximately 86 acres in the Population/Housing Chapter [2014 Master Plan EIR page 3.11-7]). For clarity and consistency, the SEIR defines the Project site as approximately 81.9 acres, inclusive of the main campus and associated non-contiguous parcels evaluated in the 2014 Master Plan EIR.

located at the northeast corner of Mission Road and Zonal Avenue; Big Blue, located at the southeast corner of Mission Road and Zonal Avenue; and Parking Structure 9, off the main campus located on the opposite side of Marengo Street. The main campus is generally bounded by Zonal Avenue, Mission Road, Marengo Street, and Chicago Street. State Street bisects the main campus. The Campus is surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles, in the County of Los Angeles. The Project Site boundaries evaluated in the Draft SEIR is the same project site boundaries as in the 2014 Master Plan EIR. The Project Site is not on a hazardous waste site that is included on any list compiled pursuant to Section 65962.5 of the Government Code.

A number of buildings and features associated with the medical uses of the Campus currently occur within the Project Site. The Campus is surrounded by a mix of institutional, medical, commercial, residential, and industrial uses. The Project Site is located immediately northeast of Interstate (I) 5 (Golden State Freeway) and north of I-10 (San Bernardino Freeway). See Figure 2-2, *Project Site Boundaries,* and Figure 2-3, *Local Vicinity,* of the Draft SEIR.

PROJECT OBJECTIVES

HEALTHCARE, PUBLIC HEALTH, AND WHOLE-PERSON WELLNESS

1. To meet the current and future healthcare needs of the Los Angeles region by supporting the continued provision of essential medical services and enabling evolving models of care.
2. To redevelop the campus in a manner that advances whole-person health, including reducing housing insecurity, improving access to healthcare services, expanding access to open space, advancing transportation equity, and supporting social and economic wellbeing.

HOUSING AND ECONOMIC OPPORTUNITY

3. To preserve and adaptively reuse the historic General Hospital, maintaining architectural, cultural, and civic significance while enabling functional modernization and long-term economic viability.
4. To maximize the provision of new housing, including affordable, supportive, workforce, and other needed housing types, to address housing needs of the County and the greater Los Angeles region.
5. To promote economic and workforce development that benefits surrounding communities, including opportunities for job creation, workforce training, and local-serving commercial and institutional uses.
6. To provide community-serving, institutional, educational, commercial, community facilities, and public-facing uses that support daily needs, encourage shared use of the campus, and reinforce the campus's role as an accessible and welcoming civic place.

CIRCULATION, ACCESS, AND OPEN SPACE

7. To develop multimodal circulation that enhances connectivity within the Campus, specifically between east and west Campus, and improves access to adjacent neighborhoods, institutions, and regional transportation systems.
8. To create a cohesive, campus-wide landscape and open space framework that provides abundant, accessible public and semi-public spaces to support community activity, wellness, and social interaction.

INFRASTRUCTURE, SUSTAINABILITY, AND RESILIENCE

9. To replace and modernize aging utilities and infrastructure to support long-term campus operations.
10. To promote environmental sustainability through compact development, adaptive reuse, efficient infrastructure systems, and reduced reliance on single-occupancy vehicle travel.
11. To develop resilient infrastructure designed to withstand and recover from natural hazards while providing reliable, sustainable systems that support both project operations and serve as a community resource during emergencies.

PROJECT DESCRIPTION

The Proposed Project involves implementation of the proposed Master Plan, which would guide the long-term redevelopment of parts of the Project Site, including adaptive reuse of the General Hospital Building. The proposed Master Plan presents a conceptual, planning-level vision of the types of uses, scale, and locations of potential future development activities that could occur within a 30.8-acre portion of the approximately 81.9-acre Project Site, referred to as the “Master Plan Boundary” in the proposed Master Plan (see Section 1, Introduction, of the proposed Master Plan). The Master Plan Boundary covers that portion of Project Site that is the subject of the public-private partnership between the DEO on behalf of the County and the developer to reimagine the Campus through implementation of the Master Plan. Detailed site development plans, building configurations, and architectural designs would be prepared as future project-level approvals are proposed and would be consistent with the guiding vision of the proposed Master Plan.

The approximately 51.1 acres of the Project Site that are not subject to the proposed Master Plan would continue to be governed by the previously approved 2014 Master Plan and its associated development parameters. Certain previously approved land uses that were identified in the 2014 Master Plan that have not yet been implemented to date have been carried forth into this Draft SEIR. These uses include Community Facilities, Clean Tech/Light Industrial, Medical Office, General Office, and Hospital[3]. Because development within the areas of the

[3] The 2014 Master Plan EIR used different land use nomenclature for the proposed uses under the 2014 Master Plan. The land use titles under the 2014 Master Plan included: Wellness-Oriented Community Facilities, New

Project Site outside of the Master Plan Boundary would continue to occur pursuant to the 2014 Master Plan, this Draft SEIR evaluates potential environmental impacts associated with a conservative, maximum development scenario across the entire Project Site to ensure that a full range of potential redevelopment on the Project Site is considered.

Table 1, *Proposed Project Land Uses*, summarizes the maximum anticipated development proposed on the Project Site by land use type. The numbers in Table 1 represent the maximum amount of development that could take place on the Project Site and are used as the basis for the environmental assessment in the Final SEIR.

Table 1 Proposed Project Land Uses

Proposed Land Use	Units	Square Footage
Residential	3,200 du	2,300,000
General Office	--	400,000
Medical Office	--	735,300
Retail	--	320,000
Patient and Caregiver Lodging	200 rooms	80,000
Community Facilities	--	350,000
Education	--	110,000
Warehouse	--	160,000
Clean Tech/ Light Industrial	--	200,000
Hospital	450 beds	400,000
Parking	8,588 spaces	3,005,678
Total	**3,200 du 450 hospital beds 200 rooms 8,588 parking spaces**	**8,060,978 square feet of new development**

To support the development of the proposed new uses, the Proposed Project includes other improvements related to infrastructure, including utilities, circulation and transportation demand management strategies, parking, and open space and landscaping. In addition to onsite improvements to infrastructure, some work may occur offsite within the City of Los Angeles, such as utility connections/replacements, public right-of-way improvements, and other related

Utility Plant and Facilities, Outpatient Clinics/Laboratories/Medical Office, Professional/Administrative Office, Research and Development, Hospital Addition, Warehouse/Storage, and Residential Care Facilities. Land uses that would be carried over under the Proposed Project include: Wellness-Oriented Community Facilities (Community Facilities), New Utility Plant and Facilities (Clean Tech/Light Industrial), Outpatient Clinics/Laboratories/Medical Offices (Medical Office), Professional/Administrative Offices (General Office), Hospital, and Research and Development (Clean Tech/Light Industrial).

activities. Any future offsite improvements would be coordinated directly with and overseen by the appropriate agencies (i.e., Los Angeles Department of Water and Power, Los Angeles Sanitation Districts, City of Los Angeles Department of Transportation, City of Los Angeles Department of Public Works, Caltrans, etc.).

Detailed site development plans, building configurations, and architectural designs would be prepared at the time of future project-level approvals and would be consistent with the guiding vision of the proposed Master Plan. The Proposed Project would be developed over an estimated period of 25 years and would be implemented in phases; the actual number of units and quantities of land use types would be determined as individual project elements are implemented and could be less than the maximum envelope analyzed in the Draft SEIR. In addition, the precise distribution of land uses, square footage, and associated population among individual land use categories may vary over time in response to operational needs, provided that the overall development intensity analyzed in the Draft SEIR would not be exceeded.

Approximately 51.1 acres of the Project Site not subject to the proposed Master Plan would continue to be governed by the previously approved 2014 Master Plan and its associated development parameters. However, because development within the remainder of the Project Site would continue to occur pursuant to the 2014 Master Plan, the Draft SEIR evaluates potential environmental impacts associated with development across the entire Project Site to ensure that a full range of potential redevelopment on the Project Site is considered. See Chapter 2, *Project Description*, of the Draft EIR for the full project description.

III. ORGANIZATION AND FORMAT OF FINDINGS

The findings are divided into the following subsections:

Section IV(A); Findings on Impacts Determined to Result in No Impact or Less Than Significant Impact, presents the impacts of the Proposed Project that were determined in the Final SEIR to be less than significant without the addition of mitigation measures and presents the rationales for these determinations.

Section IV(B): Findings on Impacts Mitigated to Less Than Significant, presents significant impacts of the Proposed Project that were identified in the Final SEIR, the mitigation measures identified in the MMRP, and the rationales for the findings.

Section IV(C): Findings on Significant Unavoidable Impacts, presents significant impacts of the Proposed Project that were identified in the Final SEIR.

Section V: Alternatives to the Proposed Project, presents alternatives to the Proposed Project and evaluates them in relation to the findings set forth in State CEQA Guidelines Section 15091(a)(3), which allows a public agency to approve a project that would result in one or more

significant environmental effects if the project alternatives are found to be infeasible because of specific economic, social, or other considerations.

IV. CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS

Section 15091 of the State CEQA Guidelines requires that a lead agency make a finding for each significant effect resulting from implementation of the project. This section summarizes the significant environmental impacts of the Proposed Project, describes how these impacts are to be mitigated, and discusses various alternatives to the Proposed Project, which were developed in an effort to reduce the remaining significant environmental impacts.

Based on the Final SEIR discussion and analysis, the following is a summary of the environmental topics considered to have no impact, a less than significant impact, and a significant and unavoidable impact.

A. FINDINGS ON IMPACTS DETERMINED TO RESULT IN NO IMPACT OR LESS THAN SIGNIFICANT IMPACT

No Impact or Less Than Significant Impact

The County finds, based on substantial evidence in the record, that the Proposed Project will not result in significant impacts requiring mitigation with respect to the following issues. The analysis in the Draft SEIR determined that these issues would result in no impact or less than significant impacts:

- **Chapter 5.1.1, Agriculture and Forestry Resources** (Significance Criteria a-e; Cumulative Impacts [construction and operation])
- **Chapter 3.1, Aesthetics** (Significance Criteria a, b, c, and d; Cumulative Impacts [construction and operation])
- **Chapter 3.2, Air Quality** (Significance Criterion a [construction and operation])
- **Chapter 3.3, Biological Resources** (Significance Criteria a [operation], b, c, and f [construction and operation])
- **Chapter 3.4, Cultural Resources** (Significance Criterion a, b [operation], c [construction and operation])
- **Chapter 3.5, Energy** (Significance Criteria a, and b; Cumulative Impacts [construction and operation])
- **Chapter 3.6, Geology and Soils** (Significance Criteria b and e [construction and operation], and f [operation])

- **Chapter 3.7, Greenhouse Gas Emissions** (Significance Criterion b [construction and operation])
- **Chapter 3.8, Hazards and Hazardous Materials** (Significance Criteria c, d [operation], e [construction and operation], f [operation], and g [construction and operation])
- **Chapter 3.9, Hydrology and Water Quality** (Significance Criterion c [construction], d [construction and operation], and e [construction])
- **Chapter 3.10, Land Use and Planning** (Significance Criterion a [construction and operation] and b [construction])
- **Chapter 5.1.2, Mineral Resources** (Significance Criteria a and b; Cumulative Impacts [construction and operation])
- **Chapter 3.11, Noise** (Significance Criterion b [operation] and c [construction and operation])
- **Chapter 3.12, Population and Housing** (Significance Criteria a and b; Cumulative Impacts [construction and operation])
- **Chapter 3.13, Public Services** (Significance Criteria a [operation])
- **Chapter 3.14, Recreation** (Significance Criterion a [construction and operation)
- **Chapter 3.15, Transportation** (Significance Criterion a [operation], b [construction and operation], and d [operation])
- **Chapter 3.16, Tribal Cultural Resources** (Significance Criterion a [operation]; Cumulative Impacts [operation])
- **Chapter 3.17, Utilities and Service Systems** (Significance Criteria a [construction and operation], b [construction], d, and e [construction and operation]; Cumulative Impacts [construction])
- **Chapter 3.18, Wildfire** (Significance Criteria a, b, c, and d; Cumulative Impacts [construction and operation])

B. FINDINGS ON IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

The County finds, based on substantial evidence in the record, that the Proposed Project will have impacts mitigated to less than significant with the corresponding feasible mitigation measures provided in the Draft SEIR, with respect to the following issues:

CHAPTER 3.2, AIR QUALITY

Environmental Impact:

The Proposed Project would have a potentially significant impact related to air quality as follows:

- **Impact AIR-1:** Implementation of the Proposed Project would generate construction emissions that have the potential to exceed the South Coast AQMD regional significance thresholds.
- **Impact AIR-3:** Implementation of the Proposed Project would generate onsite construction criteria air pollutant emissions that have the potential to exceed the South Coast AQMD localized significance thresholds.
- **Impact AIR-6:** Operation of light industrial uses accommodated under the Proposed Project could generate odors that would affect a substantial number of people.
- **Impact AIR-7:** The Proposed Project's construction activities have the potential to result in cumulative air quality impacts related to criteria pollutant emissions during construction.
- **Impact AIR-9:** The Proposed Project's operation-related activities have the potential to result in cumulative air quality impacts related to odors.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The mitigation measures as provided include any revisions incorporated in the Final SEIR that were made as a result of comments received on the Draft SEIR.

Impact AIR-1

Mitigation Measure AIR-1a: To reduce volatile organic compounds (VOC) emissions during construction, the Project Applicant(s)/Contractor(s) shall use paints with a VOC content that meets the South Coast Air Quality Management District Super Compliant architectural coatings standard of less than 10 grams per liter (g/L) for coating building architectural surfaces during construction. This measure shall be noted on all site and construction plans.

Mitigation Measure AIR-1b: To reduce nitrogen oxide (NO_X) emissions during construction, the Project Applicant(s)/Contractor(s) shall implement the following measures during construction:

- Use construction equipment rated by the United States Environmental Protection Agency (USEPA) as having Tier 4 Final or higher exhaust emission limits for offroad equipment with engines 25 horsepower or higher. If Tier 4 Final equipment is not readily available, the contractor may apply other technologies available for construction equipment such that it would achieve a comparable reduction in NO_X and PM emissions comparable to that of Tier 4 construction equipment. Where alternatives to USEPA Tier 4 are utilized, the contractor shall be required to show evidence to the Project Applicant(s) that these alternative technologies would achieve comparable emissions

reductions. Certifications or alternative reduction strategies shall be required prior to receiving a construction permit.

- Maintain a list of all operating equipment in use on the construction site during construction for verification by the County. The construction equipment list shall state the makes, models, Equipment Identification Numbers, Engine Family Numbers, and number of construction equipment on-site.
- Haul and delivery truck idling times shall be minimized by shutting equipment off when not in use or reducing maximum idling time to less than three (3) minutes (beyond that required by 13 California Code of Resources [CCR] Chapter 10, Section 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 conditions prior to operation.
- A traffic control plan shall be prepared and provided to the County.
- A carpool program for construction workers, including incentivizing carpooling as well providing bus service for crew members shall be implemented.
- Truck deliveries shall be consolidated when possible.
- The combined vehicle miles traveled per day for offsite haul truck trips associated with demolition debris and earthen material export/import hauling operations shall not exceed 8,930 miles per day (equivalent to 180 one-way truck haul trips at 49.61 miles per one-way trip, which is the average distance to nearby serving landfills). The construction contractor(s) overseeing hauling operations shall log the number of daily haul truck loads and the one-way haul trip distance for each truck haul load of either demolition debris or earthen material for days in which truck hauling of these materials occurs.
- The measures under this mitigation measure shall be noted on all site and construction plans.

Impact AIR-3 **Mitigation:** Implement Mitigation Measure AIR-1b and Mitigation Measure AIR-2.

Impact AIR-6 **Mitigation Measure AIR-6:** Prior to discretionary approval by the County of Los Angeles, if it is determined that a development project has the

potential to emit nuisance odors, an odor management plan shall be prepared by the Project Applicant(s)/Contractor(s) and submitted to the Los Angeles County Department of Regional Planning for review and approval. Facilities that have the potential to generate nuisance odors include, but are not limited to:

- Wastewater treatment plants
- Composting, green waste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations Implement Mitigation Measure AIR-6.
- Large-capacity coffee roasters
- Food-processing facilities

The odor management plan shall demonstrate compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors and be submitted to the County. The Odor Management Plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include but are not limited to scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be incorporated into the project's design and on-site plan(s).

Impact AIR-7 **Mitigation:** Implement Mitigation Measures AIR-1a and 1b.

Impact AIR-9 **Mitigation:** Implement Mitigation Measure AIR-6.

CHAPTER 3.3, BIOLOGICAL RESOURCES

Environmental Impact:

The Proposed Project would have a potentially significant impact related to biological resources as follows:

- **Impact BIO-1:** During the construction phase, the Proposed Project could impact roosting special-status bats, including the pallid bat, western yellow bat, and western mastiff bat.
- **Impact BIO-2:** Construction of the Proposed Project would potentially have an adverse effect on migratory birds.
- **Impact BIO-3:** During the construction and operation phases, the Proposed Project could impact protected live oak trees on the Project Site.

- **Impact BIO-4:** During the operational phase, the Proposed Project could impact protected live oak trees on the Project Site.
- **Impact BIO-5:** During the construction phase, the Proposed Project could result in a cumulative impact on roosting special-status bats, including the pallid bat, western yellow bat, and western mastiff bat.
- **Impact BIO-6:** During the construction phase, the Proposed Project could result in a cumulative impact on migratory birds.
- **Impact BIO-7:** During the construction phase, the Proposed Project could result in a cumulative impact on protected live oak trees on the Project Site.
- **Impact BIO-8:** During the operational phase, the Proposed Project could result in a cumulative impact on protected live oak trees on the Project Site.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The mitigation measures as provided include any revisions incorporated in the Final SEIR.

Impact BIO-1

Mitigation Measure BIO-1: Mitigation for Impacts to Special-Status Bats. To avoid impacts on roosting bats, preconstruction surveys shall be conducted by a qualified bat biologist prior to the on-set of construction 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 buffer zone (or an alternative buffer zone, as determined by the biologist) 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 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 that 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 the California Department of Fish and Wildlife (CDFW).

- Non-maternity roost trees should ideally be removed or trimmed in the fall between September 16 and October 31. If the removal or trimming 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.

Impact BIO-2

Mitigation Measure BIO-2: Mitigation for Impacts to Nesting Birds. Construction activities shall avoid the nesting season for birds to the extent feasible, or conduct preconstruction nesting bird surveys if construction activities are carried out during the nesting season. To ensure compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), the Project Applicant(s), or through the general contractor(s), shall conduct all vegetation removal during the non-breeding season, between September 1 and January 31, or implement the following:

If the removal of vegetation, demolition of buildings, or noise-generating construction activities are scheduled between February 1 and August 31, the County or Project Applicant/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 construction activities within any potential nesting habitat (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 qualified biologist. The preconstruction nesting bird surveys shall be conducted no more than seven days prior to initiation of vegetation removal, building demolition activities, or noise-generating construction activities. If no active nests are detected during these surveys, no restrictions on Project activities are 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 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 the County for review and approval of the recommended nest buffer areas, if any, prior to commencement of any vegetation removal, building demolition, or noise-generating construction activities on the Project Site.

Impact BIO-3

Mitigation Measure BIO-3: Mitigation for Impacts to Protected Trees. Prior to removal, relocation, or maintenance of protected oak trees, a qualified arborist shall inventory and evaluate the health of protected oak trees on the Project Site and evaluate the potential for impacts. If the arborist determines that the proposed activity would cut, destroy, remove, relocate, inflict damage, or encroach into a protection zone of a protected oak tree, the Project Applicant/Contractor shall submit an application for approval to the Los Angeles County Department of Regional Planning and obtain approval prior to impacting a protected oak tree. The Project Applicant(s)/Contractor(s) shall be required to implement the conditions of the approval, including planting and care of replacement trees and protections for non-impacted oak trees. When planting replacement trees is required, replacement trees shall be in the ratio of two trees planted for each tree impacted. Replacement trees shall

be indigenous oak species and shall be at least 15-gallon size and measure at least one inch in diameter one foot above the base. Replacement trees shall be properly cared for and maintained for two years and replaced if they die within that period.

Impact BIO-4 **Mitigation:** Implement Mitigation Measure BIO-3.

Impact BIO-5 **Mitigation:** Implement Mitigation Measure BIO-1.

Impact BIO-6 **Mitigation:** Implement Mitigation Measure BIO-2.

Impact BIO-7 **Mitigation:** Implement Mitigation Measure BIO-3.

Impact BIO-8 **Mitigation:** Implement Mitigation Implement Mitigation Measure BIO-3.

CHAPTER 3.4, CULTURAL RESOURCES

Environmental Impact:

The Proposed Project would have a potentially significant impact related to cultural resources as follows:

- **Impact CUL-2:** The Proposed Project's construction activities throughout the Project Site have the potential to result in substantial adverse changes in the significance of archaeological resources.
- **Impact CUL-4:** The Proposed Project's construction activities have the potential to result in cumulative impacts on archaeological resources.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The mitigation measures as provided include any revisions incorporated in the Final SEIR.

Impact CUL-2 **Mitigation Measure CUL-2:** Prior to any demolition, grading, or excavation related to the construction of facilities or improvements under the Proposed Project, a qualified archaeologist shall be retained by the Project Applicant(s)/Contractor(s) 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 by the qualified archaeologist, monitoring by a qualified archaeologist shall be conducted during all initial ground disturbing activities (e.g. grading, removal of foundations, utility trenching, installation of shoring/piles, etc.) within the Project Site, from ground surface level to bedrock.

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 and the area shall be secured to prevent disturbance. The County will be notified immediately. A qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards shall be retained to evaluate the significance of the find and recommend appropriate treatment measures.

If the discovered materials are determined to be significant cultural resources, the archaeologist shall develop and implement an appropriate treatment plan, which may include avoidance, preservation in place, capping with fill material, or data recovery through excavation and documentation. The Treatment Plan shall be provided to the County. Work in the vicinity of the discovery, as determined by the qualified archaeologist, shall not resume until the archaeologist has determined that appropriate measures have been implemented. 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.

If human remains are encountered, work shall halt in accordance with California Health and Safety Code Section 7050.5 and the County of Los Angeles Medical Examiner (Medical Examiner) shall be notified immediately. If the Medical Examiner determines that the remains are Native American, the Medical Examiner shall notify the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall designate a Most Likely Descendant (MLD). The MLD shall be provided the opportunity to make recommendations regarding the treatment and

disposition of the remains in accordance with Public Resources Code Section 5097.98.

Impact CUL-4 **Mitigation:** Implement Mitigation Measure CUL-2.

CHAPTER 3.6, GEOLOGY AND SOILS

Environmental Impact:

The Proposed Project would have a potentially significant impact related to geology and soils as follows:

- **Impact GEO-1:** The Proposed Project could expose people or structures to potentially significant adverse effects related to surface fault rupture, strong seismic ground shaking, liquefaction, and slope stability during construction and operation.
- **Impact GEO-2:** During construction and operation, the Proposed Project could be located on unstable soils, and wet or saturated soils within excavations may cause instability.
- **Impact GEO-3:** During construction and operation, the Proposed Project could be located on expansive or corrosive soils that may create substantial risks to life or property.
- **Impact GEO-4:** Construction could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- **Impact GEO-5:** During construction and operation, the Proposed Project, together with past, present, and reasonably foreseeable project, would be located development within a seismically active region.
- **Impact GEO-6:** During construction and operation, the Proposed Project, together with past, present, and reasonably foreseeable projects, could be located on unstable soils.
- **Impact GEO-7:** During construction and operation, the Proposed Project, together with past, present, and reasonably foreseeable projects, could be located on expansive and corrosive soils.
- **Impact GEO-8:** During construction, the Proposed Project, together with past, present, and reasonably foreseeable projects, could destroy a unique paleontological resource or unique geologic feature.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The mitigation measures as provided include any revisions incorporated in the Final SEIR.

Impact GEO-1 **Mitigation Measure GEO-1:** Prior to any structural improvements to buildings or prior to any excavation related to the construction of new facilities, detailed subsurface geotechnical evaluations shall be performed

to address site-specific conditions at the locations of the planned improvements and provide detailed recommendations for design and construction. The Project Applicant(s) or its designee shall ensure that all recommendations contained in the approved geotechnical reports are incorporated into final design plans and implemented during construction. All recommendations shall be implemented.

The geotechnical evaluation(s) shall include the following measures, at a minimum, to address potential seismic ground shaking, liquefaction, and slope stability hazards. These components establish required baseline evaluation criteria. However, the licensed geotechnical engineer(s) shall identify and incorporate any additional site-specific design and construction recommendations necessary based on the results of subsurface investigations conducted for each development phase. All recommendations shall be provided to the County, be incorporated into final engineering plans, and implemented during construction. Recommendations could include but are not limited to:

- **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 preventative techniques, such as in situ ground modification or supporting foundations with piles at depths designed specifically for liquefaction, shall be included.

  To evaluate the potential for liquefaction, subsurface evaluation may be performed. Site-specific geotechnical evaluations that assess the liquefaction and dynamic settlement characteristics of the on-site soils shall include the drilling of exploratory borings, evaluation of groundwater depths, and laboratory testing of soils.

  Methods for construction in areas with a potential liquefaction hazard may include in situ ground modification, removal of liquefiable layers and replacement with compacted fill, or support of project improvements on piles at depths designed specifically for liquefaction. Pile foundations can be designed for a liquefaction hazard by supporting the piles on dense soil or bedrock below the liquefiable zone or employing other appropriate methods, as evaluated during the Project Site-specific evaluation. Additional recommendations to address liquefaction may include densification by installation of stone columns, vibration, deep dynamic compaction, and/or compaction grouting.

- **Slope Stability:** An assessment of slope stability shall be made prior to detailed design and construction of project improvements and design techniques, such retaining walls and drainage improvements, shall be implemented as needed. Slopes created or modified as part of the Proposed Project shall be engineered to reduce the potential for slope instability.

The geotechnical evaluation(s) shall include the following measures to address and resolve site-specific unstable soil impacts:

- **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 evaluations pertaining to groundwater shall be followed.

  Excavations for underground structures shall 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 Project 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 each project, and design 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 design 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 approaches to address potential soil settlement could 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(s) shall include the following measures to address and resolve site-specific expansive and corrosive soils hazards:

- **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. Engineering methods 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, if determined necessary in the geotechnical evaluation, shall result in corrosion protection measures that address site-specific conditions. Evaluation of the potential corrosive soils hazard shall be performed prior to detailed design and construction so that, in the event the hazard exists, engineering methods may be implemented. To avoid site-specific subsurface evaluation, corrosion protection measures may be included in the initial design for the proposed project improvements.

  Depending on site-specific conditions presented geotechnical evaluation, recommendations 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 design 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.

Impact GEO-2 **Mitigation:** Implement Mitigation Measure GEO-1.

Impact GEO-3 **Mitigation:** Implement Mitigation Measure GEO-1**.**

Impact GEO-4 **Mitigation Measure GEO-4: Paleontological Resources.** 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 in paleontology, geology, or a closely related earth science discipline, and more than 10 years of experience shall be retained by the Project Applicant(s)/Contractor(s) or construction contractor. Final excavation depths, locations, and construction methods shall be determined during subsequent project-level design. Accordingly, the qualified paleontologist shall review project-specific excavation and grading plans prior to construction and identify areas where monitoring is required based on the depth and extent of excavation into paleontologically sensitive geologic units (e.g., older alluvium or Puente Formation). Monitoring shall be implemented by the qualified paleontologist during ground disturbance in those identified areas.

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 by the qualified paleontologist 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 future excavations 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 monitor 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 paleontological 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 (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 that meets federal and State curation standards and is approved in writing by the County of Los Angeles.

Following analysis, a Report of Findings with an appended itemized inventory of specimens shall be prepared by the qualified paleontologist within a reasonable timeframe from the completion of recovery. The report and inventory, when submitted to the County 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.

Impact GEO-5 **Mitigation:** Implement Mitigation Measure GEO-1.

Impact GEO-6 **Mitigation:** Implement Mitigation Measure GEO-1.

Impact GEO-7 **Mitigation:** Implement Mitigation Measure GEO-1.

Impact GEO-8 **Mitigation:** Implement Mitigation Measure GEO-4.

CHAPTER 3.8, HAZARDS AND HAZARDOUS MATERIALS

Environmental Impact:

The Proposed Project would have a potentially significant impact related to hazards and hazardous materials as follows:

- **Impact HAZ-1:** Construction of the Proposed Project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during demolition, construction, and long-term operation.
- **Impact HAZ-2:** Operation of the Proposed Project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during demolition, construction, and long-term operation.

- **Impact HAZ-3:** During construction, the Proposed Project could result in reasonably foreseeable upset and accidental release of hazardous materials through hazardous materials handling, building demolition, and disturbance of contaminated soils and subsurface conditions.
- **Impact HAZ-4:** During operation, the Proposed Project could involve the continued use, storage, and handling of hazardous materials and could create a significant hazard to the public or environment through reasonably foreseeable upset and accidental release conditions during operation absent mitigation.
- **Impact HAZ-5:** The Proposed Project would have the potential to result in significant impacts during construction related to hazardous emissions and handling of hazardous materials within one-quarter mile of existing schools.
- **Impact HAZ-6:** Construction activities for the Proposed Project would be located on a site included on hazardous materials regulatory lists and could create a significant hazard to the public or environment during demolition, grading, and excavation absent mitigation.
- **Impact HAZ-7:** Construction activities for the Proposed Project could temporarily impair and/or interfere with emergency response access.
- **Impact HAZ-8:** Construction and operation of the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during demolition and construction.
- **Impact HAZ-9:** Operation of the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during long-term operation.
- **Impact HAZ-10:** During construction, the Proposed Project, together with other past, present, and reasonably foreseeable development projects could result in reasonably foreseeable upset and accidental release of hazardous materials through hazardous materials handling, building demolition, and disturbance of contaminated soils and subsurface conditions.
- **Impact HAZ-11:** During operation, the Proposed Project, together with other past, present, and reasonably foreseeable projects, could involve the continued use, storage, and handling of hazardous materials and could create a significant hazard to the public or environment through reasonably foreseeable upset and accidental release conditions during operation absent mitigation.
- **Impact HAZ-12:** The Proposed Project would have the potential to result in significant cumulative impacts during construction related to hazardous emissions and handling of hazardous materials within one-quarter mile of existing schools.
- **Impact HAZ-13:** Construction activities for the Proposed Project, together with other past, present, and reasonably foreseeable projects, would be located on a site included on

hazardous materials regulatory lists and could create a significant hazard to the public or environment during demolition, grading, and excavation absent mitigation.

- **Impact HAZ-14:** Construction activities for the Proposed Project, together with other past, present, and reasonably foreseeable projects, could temporarily impair and/or interfere with emergency response access.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The mitigation measures as provided include any revisions incorporated in the Final SEIR.

Impact HAZ-1

Mitigation Measure HAZ-1a: 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. Hazardous building materials surveys have been conducted for many Project Site structures; however, because demolition would occur in phases and certain materials are concealed within wall assemblies, mechanical systems, and other building components that cannot be fully accessed until demolition preparation activities occur, final comprehensive pre-demolition surveys consistent with South Coast Air Quality Management District (AQMD) Rule 1403 shall be completed immediately prior to demolition of each structure. Abatement measures shall be implemented in accordance with the recommendations of these evaluations. Asbestos surveys shall be conducted in accordance with South Coast AQMD 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 a 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 be implemented during demolition and renovation activities. Demolition activities would be performed by CDPH-certified workers.

Mitigation Measure HAZ-1b: Prior to start of construction, construction activities that involve subsurface disturbance within areas of the Project Site where residual petroleum hydrocarbons and volatile organic compounds (VOCs) in groundwater have been identified or are reasonably expected to be present, including areas downgradient of the former leaking underground storage tank (LUST) location at 1200 North State Street shall account for residual petroleum hydrocarbons and VOCs in groundwater that remain following regulatory closure of the former

leaking underground storage tank case. A qualified environmental professional shall evaluate the potential for vapor encroachment conditions (VEC) and specify appropriate management measures, which may include removal and disposal of contaminated soil, groundwater management, vapor mitigation, or other remedial actions, consistent with regulatory requirements and recommendations of the Phase II ESA. The management measures shall be implemented during soil disturbing activities.

Mitigation Measure HAZ-1c: Prior to construction, the Project Applicant(s) shall conduct additional confirmatory subsurface investigations in areas of known or suspected concern identified in the completed Phase II Subsurface Investigation and Methane Survey, including former and suspected underground storage tank locations, both those abandoned in place and those without verified removal documentation, as well as former boiler and powerhouse areas. Because prior investigations were limited to accessible areas and did not include full site-wide excavation or investigation beneath existing structures, utilities, and active facilities, the extent of residual contamination cannot be fully characterized until demolition and site access occur. Therefore, additional confirmatory investigation shall be completed prior to grading in each affected area to fully delineate any residual contamination. These investigations shall evaluate whether residual contamination remains that could affect redevelopment. If additional residual contamination is found, a qualified geologist or industrial hygienist shall recommend appropriate remedial actions, which may include removal, disposal, or remediation of affected soils or structures, consistent with regulatory requirements. These remedial actions shall be implemented during construction.

Mitigation Measure HAZ-1d: The documented abandoned oil well on the southern portion of the Project Site (Santa Fe Springs Mutual Oil Syndicate Well No. 1, API No. 0403705846) shall be further evaluated by a qualified petroleum engineer or geologist prior to any ground-disturbing activities, including grading, excavation, or construction, occurring within 100 feet of the well location. The evaluation shall include confirmation of the well's current condition and abandonment status through review of regulatory records and, if necessary, field investigation field investigation to verify that the well meets current CalGEM abandonment standards.

Because existing structures, pavement, utilities, and active campus operations currently limit full access to the well location and its area of potential influence, comprehensive field verification and intrusive investigation cannot be completed at this time. The final grading limits,

excavation depths, and site access conditions will not be fully known until demolition and site clearance activities occur. Therefore, confirmation of abandonment status and any necessary subsurface investigation must occur immediately prior to grading in the affected area, once safe and unobstructed access is available.

If the evaluation determines that the well has not been properly abandoned in accordance with CalGEM standards, the well shall be plugged or otherwise remediated in compliance with Public Resources Code Sections 3208 to 3217 prior to grading in the affected area.

No grading or construction activities shall occur within the 100-foot radius (area of potential influence) of the well until CalGEM has confirmed that the well meets current abandonment standards.

Impact HAZ-2

Mitigation Measure HAZ-2: Prior to the issuance of building permits for any new residential or commercial structure on portions of the Project Site where volatile organic compounds (VOCs) in soil vapor have been documented above applicable screening levels, the Project Applicant(s)/Contractor(s) shall prepare and implement a vapor intrusion mitigation plan. The plan shall include site-specific engineering controls, such as passive or active sub-slab depressurization systems, vapor barriers, or equivalent measures designed to prevent intrusion of VOCs into occupied indoor spaces.

Because final building footprints, foundation designs, and finished grades have not yet been determined, a structure-specific vapor mitigation system cannot be finalized at this time. Therefore, the vapor intrusion mitigation plan shall be prepared for each applicable structure once final design plans are available and prior to permit issuance.

The vapor intrusion mitigation plan shall be prepared by a qualified environmental professional in consultation with the Los Angeles County Department of Public Works and the Los Angeles Regional Water Quality Control Board (RWQCB). Design features shall comply with City of Los Angeles Methane Zone requirements, CalEPA guidance, and RWQCB performance standards for VOC mitigation.

Implementation of the plan, including installation of all required engineering controls, shall be verified through inspections and post-installation testing prior to occupancy. The County, in coordination with the RWQCB, shall review and approve the plan, confirm proper installation, and enforce compliance as part of the standard building permit and inspection process.

Impact HAZ-3 **Mitigation:** Implement Mitigation Measure HAZ-1a (asbestos and lead surveys and abatement), HAZ-1b (management of residual contamination and vapor encroachment at 1200 North State Street), HAZ-1c (Phase II ESA with remediation of USTs, boilers, and powerhouse areas), HAZ-1d (evaluation and, if necessary, the abandoned oil well would be properly plugged and sealed in accordance with CalGEM standards), and HAZ-2 (vapor intrusion mitigation plan for VOCs in soil vapor at future residential and commercial structures).

Impact HAZ-4 **Mitigation:** Implement Mitigation Measure HAZ-2.

Impact HAZ-5 **Mitigation:** Implement Mitigation Measures HAZ-1a (asbestos and lead surveys and abatement prior to demolition); HAZ-1b (management of residual contamination and vapor encroachment at 1200 North State Street); HAZ-1c (subsurface investigations and remediation of USTs, boilers, and powerhouse areas); and HAZ-1d (evaluation and, if necessary, the abandoned oil well would be properly plugged and sealed in accordance with CalGEM standards).

Impact HAZ-6 **Mitigation:** Implement Mitigation Measures HAZ-1a through HAZ-1d (as described under Impact HAZ-1) and Mitigation Measure HAZ-2 (as described under Impact HAZ-2) would apply to this impact. These measures collectively address hazardous building materials, residual subsurface contamination, USTs/LUSTs, VOCs in soil vapor, methane, undocumented fill, and the idle oil well, ensuring that hazards associated with the Project Site's regulatory listings are mitigated.

Impact HAZ-7 **Mitigation:** Implement Mitigation Measures TRAF-1 and TRAF-4.

Impact HAZ-8 **Mitigation:** Implement Mitigation Measure HAZ-1a through HAZ-1d.

Impact HAZ-9 **Mitigation:** Implement Mitigation Measure HAZ-2.

Impact HAZ-10 **Mitigation:** Implement Mitigation Measures HAZ-1 through HAZ-1d and HAZ-2.

Impact HAZ-11 **Mitigation:** Implement Mitigation Measure HAZ-2.

Impact HAZ-12 **Mitigation:** Implement Mitigation Measure HAZ-1a through HAZ-1c.

Impact HAZ-13 **Mitigation:** Implement Mitigation Measures HAZ-1a through HAZ-1d and Mitigation Measure HAZ-2.

Impact HAZ-14 **Mitigation:** Implement Mitigation Measures TRAF-1 and TRAF-4.

CHAPTER 3.9, HYDROLOGY AND WATER QUALITY

Environmental Impact:

The Proposed Project would have a potentially significant impact related to hydrology and water quality as follows:

- **Impact HYD-1:** Construction of the Proposed Project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- **Impact HYD-2:** Operation of the Proposed Project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- **Impact HYD-3:** Construction and operation of the Proposed Project could substantially decrease groundwater supplies such that the Proposed Project may impede sustainable groundwater management of the basin.
- **Impact HYD-4:** Operation of the Proposed Project could result in substantial erosion or siltation on- or off-site.
- **Impact HYD-5:** Operation of the Proposed Project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- **Impact HYD-6:** Operation of the Proposed Project, together with past, present, and reasonably foreseeable projects, could violate water quality standards or discharge requirements or otherwise substantially degrade surface or groundwater quality.
- **Impact HYD-7:** Construction and operations of the Proposed Project, together with past, present, and reasonably foreseeable projects, could substantially decrease groundwater supplies such that the Proposed Project may impede sustainable groundwater management of the basin.
- **Impact HYD-8:** Operation of the Proposed Project, together with past, present, and reasonably foreseeable projects, could conflict with a water quality control plan.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The mitigation measures as provided include any revisions incorporated in the Final SEIR.

Impact HYD-1 **Mitigation:** Implement Mitigation Measure HAZ-2.

Impact HYD-2 **Mitigation Measure HYD-2:** During the initial design of each future project, the Project Applicant(s)/Contractor(s) shall prepare project-specific Stormwater Mitigation Plans (SUSMP) for review and approval by

the Los Angeles County Department of Public Works (LACDPW). Low-impact development (LID) features included in project-specific SUSMPs shall be designed to minimize the leaching of nutrients from growing media. LID features shall avoid 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 elevated underdrain and a carbon food source for denitrifying bacteria to create anaerobic conditions and subsequent denitrification.

During the initial design of each future implementing project, the Project Applicant/Contractor shall also prepare project-specific Operation and Maintenance (O&M) Plans for proposed LID features and on-site landscaping for review and approval by the LACDPW. The O&M Plans shall be revised as needed as development plans and proposed LID features are revised. The project specific O&M Plans shall consider impacts on water quality due to the leaching of phosphorous. O&M practices shall include integrated pest management and organic maintenance methods, including those for hand weeding. The use of fertilizers, pesticides, herbicides, and products containing animal manure or animal products shall be avoided.

Prior to construction of future development projects on the Project Site, the Project Applicant(s)/Contractor(s) shall prepare and submit final building and landscape design plans to LACDPW demonstrating that all landscape-based LID features are designed to improve water quality and minimize the leaching of nutrients from growing media.

Impact HYD-3

Mitigation Measure HYD-3a: Prior to and during construction involving deep excavation that could encounter groundwater or dewatering, monitoring wells shall be installed by the Project Applicant(s)/Contractor(s) during construction within and around the perimeter of each structure to monitor the groundwater level and evaluate the performance of the dewatering system. Before starting dewatering operations, a baseline conditions survey conducted by a licensed geotechnical or structural engineer retained by the Project Applicant(s)/Contractor(s) 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. The baseline survey shall be submitted to the County and retained for reference during construction monitoring.

Mitigation Measure HYD-3b: During project design, the Project Applicant(s)/Contractor(s) shall retain a qualified civil or water resources

engineer to prepare a Recycled and Alternative Water Supply Feasibility Study evaluating the technical and economic feasibility of using non-potable water sources for landscape irrigation. The study shall identify feasible sources, projected supply volumes, system design concepts, and implementation costs.

Based on the results of the feasibility study, future projects shall incorporate all technically and economically feasible non-potable supply systems into the final landscape irrigation supply. Irrigation water demands greater than 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 to 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).

The County shall review and approve the Feasibility Study and irrigation design prior to permit issuance.

Impact HYD-4 **Mitigation:** Implement Mitigation Measure HYD-2.

Impact HYD-5 **Mitigation:** Implement Mitigation Measure HYD-2.

Impact HYD-6 **Mitigation:** Implement Mitigation Measure HYD-2.

Impact HYD-7 **Mitigation:** Implement Mitigation Measures HYD-3a and 3b.

Impact HYD-8 **Mitigation:** Implement Mitigation Measure HYD-2.

CHAPTER 3.10, LAND USE AND PLANNING

Environmental Impact:

The Proposed Project would have a potentially significant impact related to land use and planning as follows:

- **Impact LU-1:** Without mitigation the Proposed Project has the potential to conflict with plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, during operation.
- **Impact LU-2:** Without mitigation the Proposed Project, together with past, present, and reasonably foreseeable projects, has the potential to conflict with plans, policies, and

regulations adopted for the purpose of avoiding or mitigating an environmental effect, during operation.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The mitigation measures as provided include any revisions incorporated in the Final SEIR that were made as a result of comments received on the Draft SEIR.

Impact LU-1 **Mitigation:** Implement Mitigation Measures CUL-1a through CUL-1c, Mitigation Measure CUL-2, Mitigation Measures GEO-1 through GEO-4, Mitigation Measure NOI-1, Mitigation Measures NOI-1 through NOI-4, and Mitigation Measures TRA-1 through TRA 3.

Impact LU-2 **Mitigation:** Implement Mitigation Measures CUL-1a through CUL-1c, Mitigation Measure CUL-2, Mitigation Measures GEO-1 through GEO-4, Mitigation Measure NOI-1, Mitigation Measures NOI-1 through NOI-4, and Mitigation Measures TRA-1 through TRA 3.

NOISE

Environmental Impact:

The Proposed Project would have a potentially significant impact related to noise as follows:

- **Impact NOI-3:** The Proposed Project has the potential to result in permanent noise increases in excess of applicable standards under operational conditions related to warehouse uses, clean tech/light industrial, mechanical equipment, and outdoor events.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The mitigation measures as provided include any revisions incorporated in the Final SEIR.

Impact NOI-3 **Mitigation Measure NOI-3a: Design Project Facilities to Ensure All Mechanical Equipment Complies with County Noise Standards.** During the architectural and engineering design phase of each new facility (building, central plant, parking structure, etc.) that could introduce new mechanical equipment to the Project Site, and prior to the issuance of any building permits for the facility, the Project Applicant(s)/Contractor(s) shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to ensure that the mechanical equipment complies with Section 12.08.390 of the Los Angeles County

Code of Ordinances to reduce impacts to off-site receptors. 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.

Mitigation Measure NOI-3b: Design and Manage Outdoor Use Areas to Ensure Organized Outdoor Events Comply with County Noise Standards. 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 Project Applicant(s)/Contractor(s) 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 Section 12.08.390 of the Los Angeles County Code of Ordinances to reduce impacts to off-site receptors. Such recommendations may include, but are not limited to: controls on crowd sizes and event times, and limits on sound system power levels.

CHAPTER 3.12, PUBLIC SERVICES

Environmental Impact:

The Proposed Project would have a potentially significant impact related to public services as follows:

- **Impact PS-1:** The Proposed Project's construction activities have the potential to result in temporary lane closures and could impair or obstruct the movement of emergency vehicles.
- **Impact PS-2:** The Proposed Project's construction activities, together with other past, present, and reasonably foreseeable projects, have the potential to result in temporary lane closures and could impair or obstruct the movement of emergency vehicles.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The mitigation measures as provided include any revisions incorporated in the Final SEIR that were made as a result of comments received on the Draft SEIR.

Impact PS-1 **Mitigation:** Implement Mitigation Measure TRA-1.

Impact PS-2 **Mitigation:** Implement Mitigation Measure TRA-1.

RECREATION

Environmental Impact:

The Proposed Project would have a potentially significant impact related to recreation as follows:

- **Impact REC-2:** Operation of recreational facilities would potentially have an adverse related noise generated from organized outdoor events.
- **Impact REC-4:** The Proposed Project, together with cumulative projects, would have the potential to result in impacts on ambient noise generated from organized outdoor events during operation.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project.

Impact REC-2 **Mitigation:** Implement Mitigation Measure NOI-3b.

Impact REC-4 **Mitigation:** Implement Mitigation Measure NOI-3b.

CHAPTER 3.15, TRANSPORTATION

Environmental Impact:

The Proposed Project would have a potentially significant impact related to transportation as follows:

- **Impact TRA-1:** Construction of the Proposed Project could create potentially significant impacts to programs, plans, ordinances, or policies addressing the circulation system.
- **Impact TRA-2**: The Proposed Project's construction activities have the potential to result in transportation hazards.
- **Impact TRA-4:** Proposed Project construction activities could result in potentially significant impacts to emergency access.
- **Impact TRA-5:** Construction of the Proposed Project, together with other past, present and reasonably foreseeable projects, could create potentially significant impacts to programs, plans, ordinances, or policies addressing the circulation system during construction.
- **Impact TRA-6:** The Proposed Project's construction activities, together with past, present, and reasonably foreseeable projects, have the potential to result in transportation hazards during construction.

- **Impact TRA-8:** Proposed Project construction activities, together with past, present, and reasonably foreseeable projects, could result in potentially significant impacts to emergency access during construction.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The measures as provided include any revisions incorporated in the Final SEIR that were made as a result of comments received on the Draft SEIR.

Impact TRA-1

Mitigation Measure TRA-1: The Project Applicant(s)/Contractor(s) shall develop and implement a Worksite Traffic Control Plan for any aspect of construction that would result in road closures, sidewalk closures, bicycle facility closures, removal of parking, or similar traffic disruptions. The Worksite Traffic Control Plan shall be prepared as part of the project design package according to the California Manual on Uniform Traffic Control Devices (CA-MUTCD) requirements, and may include, but not be limited to, the following elements;

- 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 roadway conditions.
- Maintain access to existing residences at all times.
- Work with City of Los Angeles Department of Transportation, Los Angeles Sherriff's Department, Los Angeles County Fire Department, and Los Angeles Police Department, to coordinate all construction-related plans and minimize disturbances to local emergency management services (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 transit providers to maintain access and circulation routes to existing stops during construction phases and identify appropriate detours to provide rerouting during construction while minimizing service disruptions.

- Work with the City of Los Angeles to maintain continuity and operations of existing pedestrian and bicycle facilities during construction.

Impact TRA-2 **Mitigation**: Implement Mitigation Measure TRA-1.

Impact TRA-4 **Mitigation:** Implement Mitigation Measure TRA-1.

Impact TRA-5 **Mitigation:** Implement Mitigation Measure TRA-1.

Impact TRA-6 **Mitigation:** Implement Mitigation Measure TRA-1.

Impact TRA-8 **Mitigation:** Implement Mitigation Measure TRA-1.

CHAPTER 3.16, TRIBAL CULTURAL RESOURCES

Environmental Impact:

The Proposed Project would have a potentially significant impact related to tribal cultural resources as follows:

- **Impact TCR-1:** The Proposed Project's construction activities could inadvertently uncover subsurface tribal cultural resources and cause a substantial adverse change in the significance of a tribal cultural resource, pursuant to criteria set forth in Public Resources Code Section 5020.1(k).
- **Impact TCR-2:** The Proposed Project's construction activities could inadvertently uncover subsurface tribal cultural resources and cause a substantial cumulative adverse change in the significance of a tribal cultural resource, pursuant to criteria set forth in Public Resources Code Section 5020.1(k).

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project.

Impact TCR-1 **Mitigation Measure TCR-1a: Native American Monitoring of Ground-Disturbing Activities in Native Soils**

a) The Project Applicant(s)/Contractor(s) shall invite a Native American Monitor from the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe) prior to the commencement of any ground-disturbing activities. "Ground-disturbing activities" shall include, but are not limited to, grading, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching, for each implementing phase of the Proposed Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project

description/definition and/or required in connection with the Project, such as public improvement work).

b) The Project Applicant(s)/Contractor(s) shall make reasonable efforts to execute a Tribal Monitoring Agreement with the Native American Monitor prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence any ground-disturbing activity.

c) The Native American Monitor shall work with the Project Applicant's qualified archaeologist during qualifying ground-disturbing activities to identify potential Native American Tribal Cultural Resources (TCRs) and communicate concerns regarding TCRs to the Project Applicant(s). The Native American Monitor will complete daily monitoring logs that will provide: description(s) and location(s) of the relevant ground-disturbing activity(ies), the type(s) of construction activity(ies), information and/or materials related to TCRs; and any other facts, conditions, materials, or discoveries of significance to the Tribe. Daily monitoring logs will identify and describe any discovered TCRs. Copies of daily monitoring logs will be provided to the Project Applicant(s) and the County at the end of all Project-related ground-disturbing activities. Daily monitoring logs will be kept confidential with the Project records.

d) On-site tribal monitoring shall conclude upon either of the following, whichever occurs first: (1) written notification to the Tribe from a designated point of contact for the Project Applicant(s)/Contractor(s) that all ground-disturbing activities and phases of Project implementation that may involve ground-disturbing activities are complete; or (2) written notification to the Project Applicant(s) from the Tribe that no future planned construction activity and/or development/construction phase of the Project has the potential to impact TCRs.

Mitigation Measure TCR-1b: Unanticipated Discovery of Tribal Cultural Resource (Non-Funerary)

a) In accordance with section 21074, subdivisions (a)(1)(A)-(B) of the Public Resources Code (PRC), a Tribal Cultural Resource (TCR) is a site, feature, place, cultural landscape, sacred place or object, which is of cultural value to the Tribe and either: (1) on or eligible for the California Historic Register or other local historic register or (2) the County of Los Angeles, as the lead agency for the Project, at its discretion, chooses to treat the resource as a TCR.

b) Upon discovery of any TCR or potential TCR, all construction activities within a radius deemed appropriate by the qualified archaeologist shall cease and shall not resume until the discovered TCR has been fully assessed by the Native American Monitor and/or qualified archaeologist. If the assessment finds the resource to be a TCR, treatment measures and final disposition will be determined in consultation with the Tribe.

Mitigation Measure TCR-1c: Unanticipated Discovery of Native American Human Remains and/or Associated Grave Goods

a) Native American human remains are defined in section 5097.98, subdivision (d)(1) of the Public Resources Code (PRC) as an inhumation or cremation in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in section 5097.98 of the PRC, shall be treated alike per section 5097.98, subdivisions (d)(1) and (2) of the PRC.

b) If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then section 5097.9 of the PRC as well as Health and Safety Code Section 7050.5 shall be followed.

c) Any discovery of Native American human remains and/or grave goods shall be kept confidential to prevent further disturbance.

Impact TCR-2 **Mitigation**: Implement Mitigation Measure TCR-1a through TCR-1c.

C. FINDINGS ON SIGNIFICANT UNAVOIDABLE IMPACTS

The following summary describes unavoidable adverse environmental impacts of the Proposed Project, even with the implementation of feasible mitigation measures, or where mitigation measures were found to be infeasible. The County finds, based on substantial evidence in the record, that the proposed Project will have significant and unavoidable impacts in the following issues:

- Air Quality (Impact AIR-2, AIR-4, AIR-5, and AIR-8)
- Cultural Resources (Impact CUL-1 and CUL-3)
- Greenhouse Gas Emissions (Impacts GHG-1 and GHG-2)
- Noise (Impacts NOI-1, NOI-2, NOI-4, NOI-5, NOI-6, and NOI-7)
- Recreation (Impacts REC-1 and REC-3)
- Transportation (Impacts TRA-3 and TRA-7)
- Utilities and Service Systems (Impacts USS-1, USS-2, USS-3, and USS-4)

Findings Regarding Significant and Unavoidable Impacts

In accordance with PRC Section 21081 and State CEQA Guidelines Section 15091, the County adopts one or more of the three possible findings for each significant impact. These findings are provided below and will be used hereinafter and referenced as identified below:

- **CEQA Finding 1.** Changes or alterations have been required in, or incorporated into, the Proposed Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR (State CEQA Guidelines Section 15091[a][1].

- **CEQA Finding 2.** Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency (State CEQA Guidelines Section 15091 [a][2]).

- **CEQA Finding 3.** Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible, the mitigation measures or project alternatives identified in the Final EIR (State CEQA Guidelines Section 15091 [a][3]).

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. However, project modification or alternatives are not required where such changes are infeasible, as stated in State CEQA Guidelines Section 15091(a)(3). State CEQA Guidelines Section 15364 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors."

For those significant impacts that cannot be mitigated to a less than significant level, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects" (State CEQA Guidelines Sections 15093 and 15043[b]; see also PRC Section 21081[b]).

The following significant environmental impacts of the Proposed Project are unavoidable and cannot be feasibly or effectively mitigated to a less than significant level. In accordance with Section 15093 of the State CEQA Guidelines, a Statement of Overriding Considerations was prepared (under separate cover) to substantiate the County's decision to accept these unavoidable substantial, adverse environmental effects because of the benefits afforded by the Proposed Project.

For each Proposed Project resource category discussed below, the following sections are provided:

- **Impact:** A specific description of the significant environmental impact(s) identified in the Draft SEIR.
- **Mitigation:** Identified feasible mitigation measures that are required as part of the Proposed Project. (If mitigation is infeasible, the reasons supporting the finding that mitigation is infeasible are discussed below under "Facts in Support of Findings.")
- **Finding:** One or more of the three specific findings set forth in State CEQA Guidelines Section 15091.
- **Facts in Support of Finding:** A summary of the reasons for the finding(s) is provided for each impact. Additional substantiation regarding the feasibility (or infeasibility) of mitigation is provided at the end of this section (which is relevant to all impacts under the given resource category).

CHAPTER 3.2, AIR QUALITY

Environmental Impact

The Proposed Project would have significant and unavoidable impacts related to air quality as follows:

- **Impact AIR-2:** Implementation of the Proposed Project would generate operation emissions that exceed the South Coast AQMD regional significance thresholds.
- **Impact AIR-4:** Warehousing and light industrial uses accommodated under the Proposed Project would generate onsite operational criteria air pollutant emissions from non-permitted sources that exceed the South Coast AQMD localized significance thresholds.
- **Impact AIR-5:** Warehousing and light industrial uses accommodated under the Proposed Project would generate onsite operational TAC emissions from non-permitted sources that exceed the South Coast AQMD localized significance thresholds.
- **Impact AIR-8:** The Proposed Project's operation-related activities have the potential to result in cumulative air quality impacts related to criteria pollutant emissions during operation.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The measures as provided include any revisions incorporated in the Final SEIR that were made as a result of comments received on the Draft SEIR. As described in detail in the Final SEIR (Chapter 2, *Responses to Comments*), certain mitigation measure revisions or additions suggested by South Coast AQMD (see responses to comments A5-9 and A5-10) and LAUSD (see responses to comments A3-5 and A3-6 of the Final SEIR) were determined to be either not applicable to the Proposed Project, or infeasible.

Impact AIR-2 **Mitigation Measure AIR-2:** Future private tenants/business entities (i.e., non-County of Los Angeles owned or operated businesses) for new

development projects that own their own truck fleets for daily business operations shall only operate trucks that are either zero-emission (Z/E) and/or meet the California Air Resources Board NO_X emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr) for Class 2b through Class 8 vehicles with a gross vehicle weight rating over 8,500 pounds. The project developer/facility owner shall disclose this requirement to all tenants/business entities and provide written verification to the County prior to issuance of Business License. In addition, the truck requirements under this mitigation measure shall be included in all leasing agreements.

Prior to issuance of a Business License for a new tenant/business entity, the project developer/facility owner and tenant/business entity shall provide a signed document (verification document) to the County noting that the project development/facility owner has disclosed to the tenant/business entity the requirement that any owned Class 2b through Class 8 vehicles with a GWVR over 8,500 pounds used for daily business operations shall be either Z/E and/or meet the NOX emissions standard of 0.02 g/bhp-hr. This verification document shall be signed by authorized agents for the project developer/facility owner and tenant/business entities and retained and posted by the Business License by the facility owner onsite. In addition, if applicable, the tenant/business entity shall provide documentation (e.g., purchase agreement) to the County to verify, to the County's satisfaction, that any owned vehicle subject to the requirements under this mitigation measure comply.

In addition, implement Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d.

Impact AIR-4

Mitigation Measure AIR-4a: Project Applicant(s)/Contractor(s) for new development projects that would use off-road equipment (e.g., forklifts and yard trucks) in daily business operations shall only utilize electric-powered off-road equipment. The project developer/facility owner shall disclose this requirement to all tenants/business entities and provide written verification to the County prior to issuance of Business License. In addition, the limitation to use only electric-powered off-road equipment shall be included in all leasing agreements.

Prior to issuance of a Business License for a new tenant/business entity, the project developer/facility owner and tenant/business entity shall provide a signed document (verification document) to the County noting that the project development/facility owner has disclosed to the tenant/business entity the requirement to use only electric-powered equipment for daily operations. This verification document shall be signed by authorized agents for the project developer/facility owner and

tenant/business entities and retained and posted by the Business License by the facility owner onsite. In addition, if applicable, the tenant/business entity shall provide documentation (e.g., purchase or rental agreement) to the County to verify, to the County's satisfaction, that any off-road equipment utilized will be electric-powered.

Mitigation Measure AIR-4b: Project Applicant(s)/Contractor(s) for new development projects that would use transport refrigeration units (TRUs) in daily business operations use only electric standby and/or hybrid electric TRUs (E/S TRUs). All E/S TRUs shall comply with the California Air Resources Board's "Alternative Technology" requirements under Section 2477(e)(1)(A)(3) of the California Code of Regulations, Title 13, Article 8, Chapter 9, Division 3. The project developer/facility owner shall disclose this requirement to all tenants/business entities prior to the signing of any lease agreement. In addition, the limitation to use only E/S TRUs shall be included in all leasing agreements.

Prior to issuance of a Business License for a new tenant/business entity, the Project Applicant(s)/Contractor(s) and tenant/business entity shall provide a signed document (verification document) to the Los Angeles County Department of Regional Planning noting that the project development/facility owner has disclosed to the tenant/business entity the requirement to use only E/S TRUs for daily operations. This verification document shall be signed by authorized agents for the project developer/facility owner and tenant/business entities. In addition, if applicable, the tenant/business entity shall provide documentation (e.g., purchase or rental agreement) to the Los Angeles County Department of Regional Planning to verify, to the County's satisfaction, that any TRUs utilized will be E/S TRUs.

Mitigation Measure AIR-4c: To reduce idling emissions from transport trucks, Project Applicant(s)/Contractor(s) for new warehousing or general industrial development projects place signage at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations (e.g., Rule 2485). At minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict nonessential idling to no more than two consecutive minutes (compared to five minutes currently allowed under Rule 2485); and 3) telephone numbers of the building facilities manager and CARB to report violations. All signage shall be made of weatherproof materials. All site and architectural plans submitted to the County shall note the locations of these signs.

Mitigation Measure AIR-4d: All truck/dock bays for new proposed facilities that accommodate cold storage shall be electrified to facilitate plug-in capability and support use of electric standby and/or hybrid electric transport refrigeration units. All site and architectural plans submitted to the County shall note all the truck/dock bays designated for electrification. Prior to the issuance of a Certificate of Occupancy, the Los Angeles County Building & Safety Division shall verify electrification of the designated truck/dock bays.

Impact AIR-5 **Mitigation:** Implement Mitigation Measures AIR-2 and AIR-4a through AIR-4d.

Impact AIR-8 **Mitigation:** Implement Mitigation Measures AIR-2, AIR-4a through 4d, Mitigation Measures GHG-1a through GHG-1c, and Mitigation Measure TRA-3d.

Findings:

The County hereby adopts CEQA Findings 1 and 3. As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the Proposed Project outweigh its significant effects on the environment.

Facts in Support of Findings:

Impact AIR-2:

- Buildout of the Proposed Project would generate long-term criteria air pollutant emissions that would exceed South Coast Air Quality Management District's (AQMD's) regional significance thresholds and cumulatively contribute to the nonattainment designations of the Southern California Air Basin (SoCAB). Implementation of Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3e, as expanded in the Final SEIR as a result of public agency comments received, would contribute to reducing mobile-source, area-source, and energy sector criteria air pollutant emissions to the extent feasible. However, due to the magnitude of emissions generated by the land uses that would be accommodated by the Proposed Project, long-term criteria air pollutant emissions generated from the Proposed Project could still exceed the South Coast AQMD's regional significance thresholds. All feasible mitigation measures were considered in the Draft and Final SEIR. Therefore, Impact AIR-2 would remain significant and unavoidable.

Impact AIR-4:

- Implementation of Mitigation Measures AIR-2 and AIR-4a through AIR-4d would minimize localized onsite operation-related criteria air pollutant emissions. However, because no site-

specific warehousing or industrial development project is currently proposed and the specific operations of such facilities (e.g., number of heavy-duty truck trips, location of facility, etc.) are unknown, the associated emissions, and concentrations levels cannot be determined or modeled. Accordingly, the analysis in the Draft SEIR conservatively evaluates the maximum development potential under the proposed Master Plan to ensure that air quality impacts are not underestimated. Thus, while implementation of mitigation as revised in the Final SEIR in response to public agency comments received would reduce emissions, future warehousing and industrial land uses could still exceed the South Coast AQMD localized significance thresholds (LSTs). All feasible mitigation measures were considered in the Draft and Final SEIR. Therefore, Impact AIR-4 would remain significant and unavoidable.

Impact AIR-5:

- Implementation of Mitigation Measures AIR-4a through AIR-4d, as revised in the Final SEIR due to public agency comments received, would minimize localized onsite operation-related TAC emissions. However, because no specific warehousing or industrial development project is currently proposed and the specific operations of such facilities (e.g., number of heavy-duty truck trips, location of facility, etc.) are unknown, the associated emissions, and health risk levels cannot be determined or modeled. Accordingly, the analysis in the Draft SEIR conservatively evaluates the maximum development potential under the proposed Master Plan to ensure that air quality impacts are not underestimated. Thus, while implementation of mitigation would reduce emissions, future warehousing and industrial land uses could still exceed the South Coast AQMD health risk thresholds. All feasible mitigation measures were considered in the Draft and Final SEIR. Therefore, Impact AIR-5 would remain significant and unavoidable.

Impact AIR-8:

- Implementation of Mitigation Measures AIR-2, as included in the Final SEIR due to public agency comments received, would minimize operation-related NO_x emissions. Under South Coast AQMD methodology, project-level operational impacts also represent cumulative operational impacts. The cumulative impact determination is based on the project-level significance with mitigation determination. Thus, the significance with mitigation determination accounts for all the potential reductions associated with the identified mitigation measures, as revised in the Final SEIR due to public agency comments received. All feasible mitigation measures were considered in the Draft and Final SEIR. Therefore, Impact AIR-8 would remain significant and unavoidable.

CHAPTER 3.4, CULTURAL RESOURCES

Environmental Impact

The Proposed Project would have a significant and unavoidable impact related to cultural resources as follows:

- **Impact CUL-1:** The Proposed Project's new building construction has the potential to result in substantial direct adverse changes to existing historical resources to remain (the Old Administration Building, Los Angeles General Hospital–Acute Unit Building, and Los Angeles General Hospital–Acute Unit Historic District).
- **Impact CUL-3:** The Proposed Project's construction activities have the potential to result in cumulative impacts on historical resources.

Mitigation Measures:

The Proposed Project includes the following Project Design Features (PDFs) which are identified in the Final SEIR:

PDF 1

All work within the Los Angeles General Hospital–Acute Unit Historic District and the treatment of all its contributing buildings, structures, and site features, as well as the rehabilitation of the Acute Unit Building and the treatment of all its exterior and interior character-defining features and materials, shall be overseen by a Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards. The Historic Architect shall review all drawings and specifications at major milestones (50% and 100% Schematic Design, Design Development, and Construction Documents) to conform with the Rehabilitation Standards and National Park Service guidance, as well as to ensure that historically significant views of and within the historic district are maintained. New construction within the Acute Unit Historic District shall adhere to Rehabilitation Standards No. 9 and 10 and the guidance related to new construction.

Additionally, the County is pursuing federal historic preservation tax incentives for the Acute Unit's proposed rehabilitation work, which requires rigorous review by the National Park Service (NPS) and California Office of Historic Preservation (OHP) for compliance with the Rehabilitation Standards.

PDF 2

Prior to commencement of any construction activities associated with the Los Angeles General Hospital–Acute Unit Building's exterior or interior character-defining features,[4] or the Acute Unit Historic District's contributing features (Patient's and Visitor's buildings, retaining walls, gateways, State Street, Forecourt, tunnel), a Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards shall be retained to monitor all disassembly, construction and rehabilitation activities, to ensure appropriate treatment of exterior and interior character-defining features, materials, and spaces during the construction project.

[4] Character defining features are detailed in Section 3.4.2, *Existing Conditions*, of the Draft SEIR specifically under the Evaluations of Significance discussions.

PDF 3

Prior to undergoing any demolition activities at the Los Angeles General Hospital–Acute Unit Building and any other contributing features within the Acute Unit Historic District (Patient's and Visitor's buildings, retaining walls, gateways, State Street, forecourt, tunnel), that would result in the removal of interior or exterior character-defining features (or portions thereof), Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Level II photographic documentation shall be prepared by a qualified professional meeting the Secretary of the Interior's Professional Qualifications Standards. HABS/HAER Level II drawings and historical narrative may follow after construction commences. To ensure public access, the Project Applicant(s) shall submit documentation to the following archives/organizations: Library of Congress, HABS/HAER/HALS Collection; Los Angeles Conservancy; County of Los Angeles Library; and other entities/repositories to be identified by the Historic Architect.

- **Drawings:** Existing historic drawings of the historical resource shall be photographed with large-format negatives or photographically reproduced on Mylar. In the absence of existing drawings, full-measured existing conditions drawings of the building's floorplans and exterior elevations should be prepared.
- **Photographs:** Photo-documentation shall be prepared to HABS/HAER standards for archival photography. HABS/HAER standards require large-format black-and-white photography, with the original negatives having a minimum size of 4"x5". Digital photography, roll film, film packs, and electronic manipulation of images are not acceptable. All film prints, a minimum of 4"x5", must be hand-processed according to the manufacturer's specifications and printed on fiber base single weight paper and dried to a full gloss finish. A minimum of twelve photographs must be taken. Photographs must be identified and labeled using HABS/HAER standards.
- **Historical Narrative:** An architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards shall compile historical background information relevant to the historical resource and prepare a narrative.

PDF 4

Prior to demolition of the Pharmacy Building and Viaduct, Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Level II photographic documentation shall be prepared by a qualified professional meeting the Secretary of the Interior's Professional Qualifications Standards and a qualified structural engineer with at least five years of demonstrated, related experience. HABS/HAER Level II drawings and historical narrative may follow after demolition. To ensure public access, the Project Applicant(s) shall submit documentation to the following archives/organizations: Library of Congress, HABS/HAER/HALS Collection; Los Angeles Conservancy; County of Los Angeles Library; and other entities/repositories to be identified by the Historic Architect.

- **Drawings:** Existing historic drawings of the historical resource shall be photographed with large-format negatives or photographically reproduced on Mylar. In the absence of existing

drawings, full-measured existing conditions drawings of the building's floorplans and exterior elevations should be prepared.

- **Photographs:** Photo-documentation shall be prepared to HABS/HAER standards for archival photography. HABS/HAER standards require large-format black-and-white photography, with the original negatives having a minimum size of 4"x5". Digital photography, roll film, film packs, and electronic manipulation of images are not acceptable. All film prints, a minimum of 4"x5", must be hand-processed according to the manufacturer's specifications and printed on fiber base single weight paper and dried to a full gloss finish. A minimum of twelve photographs must be taken. Photographs must be identified and labeled using HABS/HAER standards.
- **Historical Narrative:** An architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards shall compile historical background information relevant to the historical resource and prepare a narrative.

PDF 5

An Interpretation Plan shall be prepared and implemented for the "Support Services Site" that originally comprised the west half of the Los Angeles General Hospital main campus and that was largely demolished and redeveloped following the 1994 Northridge earthquake. Interpretation may include online (i.e. in the form of a StoryMap) or on-site display(s) of historic photographs, historic maps, a publicly accessible viewing platform, or other historic materials accompanied by a narrative of the history and development of the General Hospital. A team of qualified professionals with at least five years of demonstrated, related experience shall prepare a preliminary Interpretation Plan which shall be presented at a public workshop at which members of the community and interested constituent groups will have the opportunity to provide feedback that will be considered in the development of the plan.

In addition to the PDFs, the following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The measures as provided include any revisions incorporated in the Final SEIR that were made as a result of comments received on the Draft SEIR. As described in detail in the Final SEIR (Chapter 2, *Responses to Comments*), certain mitigation measure revisions or additions suggested by Los Angeles Conservancy (see response to comment O3-2,) was determined to be either not applicable to the Proposed Project, or infeasible.

Impact CUL-1 **Mitigation Program for Adjacent New Construction.** If a new construction project is proposed for a site within 50 feet of an eligible or designated historical resource, then the Project Applicant(s)/Contractor(s) shall apply Mitigation Measure CUL-1a (Secretary Standards Compliance) and engage a qualified Architectural Historian or Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to determine whether the project is adjacent to the resource (taking into account the scale of the project, any physical or visual

separation, and existing baseline conditions). If the new construction is determined not to be adjacent to the identified historical resource, the Architectural Historian/Historic Architect shall prepare a statement to that effect, and no further analysis shall be required. If the new construction is found to be adjacent to the identified resource, the Architectural Historian/Historic Architect shall assess the project, focusing on the application of Standards No. 9 and 10, both of which relate to adjacent new construction.

If the Architectural Historian concludes that the new construction project meets the Standards, then the project is presumed to not have an impact on historical resources. During implementation of the project, the Project Applicant(s)/Contractor(s) shall apply Mitigation Measure CUL-1b (Project Review During Design and Construction) and engage a qualified Architectural Historian or Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to review milestone drawings and generally be available to the design team, as needed.

If the proximity of new construction to historical resources is such that vibration during construction may cause them physical damage, as defined through Mitigation Measure NOI-4, the Project Applicant(s)/Contractor(s) shall also apply Mitigation Measure CUL-1c (Protection During Construction) and engage a qualified Historic Architect and Structural Engineer to prepare a Conditions Assessment Report and Construction Monitoring Plan.

Mitigation Measure CUL-1a: Secretary Standards Compliance. For all instances in which a project is implementing activities under the Proposed Project within 50 feet of an eligible or designated historical resource identified in this Draft SEIR, the Project Applicant shall engage the services of a qualified Architectural Historian or Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to determine whether the future implementing project activity is adjacent to the identified historical resource (taking into account the scale of the project, any physical or visual separation, and existing baseline conditions). If the future implementing project activity is determined not to be adjacent to the identified historical resource, the Architectural Historian/Historic Architect shall prepare a statement to that effect, and no further analysis shall be required. If the future implementing project activity is determined to be adjacent to the identified historical resource, the Architectural Historian/Historic Architect shall conduct an assessment of whether the proposed treatment of the historical resource complies with the Secretary of the

Interior's Standards for Rehabilitation ("the Rehabilitation Standards"). If the future implementing project activity is found to not be in compliance with the Rehabilitation Standards, then the Architectural Historian/Historic Architect shall provide recommendations for how to modify the design, siting, scale, massing, or architectural treatment of the future implementing development projects to the extent feasible to bring it into compliance, or as close to compliance as feasible, which shall be integrated into the design of the Proposed Project. The professional shall prepare a memorandum or equivalent level of documentation conveying the findings of the assessment, which shall be provided to the County.

Mitigation Measure CUL-1b: Project Review During Design and Construction. For instances in which a future project involves adjacency to a historical resource (as determined under Mitigation Measure CUL-1a), the Project Applicant(s)/Contractor(s) shall engage the services of a qualified Architectural Historian or Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to review milestone drawing sets and generally be available to the design team during design and construction. The Architectural Historian/Historic Architect shall review Design Development (DD) and Construction Documentation (CD) drawing sets at 50% and 100% completion and provide a brief memo regarding ongoing project compliance with the Standards. Project review during construction shall occur quarterly and reported in memo format, which shall be provided to the County.

Mitigation Measure CUL-1c: Protection During Construction. Prior to the commencement of construction activities within proximity to, as defined in Mitigation Measure NOI-4, a historical resource, a Conditions Assessment Report will be completed by a Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to identify baseline conditions (cracks, deterioration, etc.). The report will be provided to the County. As part of this process, a Structural Engineer shall be consulted to determine whether any shoring or protection should be installed prior to commencement of construction activities.

In addition, the Project Applicant(s)/Contractor(s) shall engage a Civil Engineer to prepare an Adjacent Building Construction Monitoring Plan ("Monitoring Plan"). The Monitoring Plan shall establish survey monuments, and document and record the positions of adjacent buildings, structures, sidewalks, utilities, facades, and surface features to form a baseline for determining settlement or deformation. The Monitoring Plan shall include the following provisions: (1) shored excavation and adjacent buildings, structures, sidewalks, utilities, facades,

and cracks shall be visually inspected at a minimum of one time per month; (2) survey monuments shall be measured at critical stages of excavation, shoring, dewatering, and construction but should not occur less frequently than once every thirty days; (3) monitoring reports shall be prepared by an appropriate technical professional California Professional Land Surveyor documenting the movement monitoring results and distributed to all appropriate parties, including the shoring engineer. The County shall be provided all documentation and be notified if movement exceeds predetermined thresholds and calculated amounts as required.

Impact CUL-3 **Mitigation:** Implement Mitigation Measures CUL-1a through CUL-1c.

Findings:

The County hereby adopts CEQA Findings 1 and 3. As described in the *Statement of Overriding Considerations*, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the Proposed Project outweigh its significant effects on the environment.

Facts in Support of Findings:

Impact CUL-1:

- Because project-level designs for future projects, including the extent to which future project would comply with the Secretary of Interior Standards are not known at this time, the analysis conservatively evaluates the maximum potential impacts associated with the Proposed Project. While future projects may avoid or reduce impacts through project-specific design and adherence to the Secretary of the Interior's Standards, the effectiveness of such measures cannot be determined at the programmatic level. All feasible mitigation measures were considered in the Draft and Final SEIR. Accordingly, construction impacts are considered to be significant and unavoidable.

Impact CUL-3:

- Mitigation Measures CUL-1a through CUL-1c and PDFs, implemented in various combinations and tailored on a case-by-case basis to address specific impacts, may reduce the Proposed Project's contributions to cumulative construction impacts to less than significant levels. However, given designs for future projects implementing the Proposed Project, and the extent to which they meet the Secretary of Interior Standards, are not known at this time, cumulative construction impacts are considered to be significant and unavoidable. All feasible mitigation measures were considered in the Draft and Final SEIR.

CHAPTER 3.7, GREENHOUSE GAS EMISSIONS

Environmental Impact

The Proposed Project would have a significant and unavoidable impact related to greenhouse gas emissions as follows:

- **Impact GHG-1:** Implementation of the Proposed Project would result in annual GHG emissions that exceed the South Coast AQMD bright-line GHG significance threshold.
- **Impact GHG-2:** The Proposed Project, together with cumulative projects, would substantially impact greenhouse gases.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The mitigation measures as provided include any revisions incorporated in the Final SEIR. As described in detail in the Final SEIR (Chapter 2, *Responses to Comments*), certain mitigation measure revisions or additions suggested by South Coast AQMD (see responses to comments A5-9, A5-10, and A5-11) and LAUSD (see response to comment A3-6 of the Final SEIR) were determined to be either not applicable to the Proposed Project, or infeasible.

Impact GHG-1

Mitigation Measure GHG-1a: For development projects that include parking (e.g., private garages, surface parking lot, etc.), the Project Applicant(s)/Contractor(s) shall implement the following provisions of the California Green Building Standards Code (CALGreen) as mandatory and not voluntary and shall list and identify them on all prepared building and site plans. The Project Applicant(s) shall submit these building and site plans that note the applicable measures to the County prior to the issuance of construction permits.

- **Residential Structures with Three or Fewer Stories.** For residential land uses with three or fewer stories, the Project Applicant(s)/Contractor(s) shall:
  - Design and build condominium/townhouses dwellings that have an attached private garage to have a dedicated electric circuit to support electric vehicle charging, as outlined in the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.8.1.
  - Design and build residential buildings to, at a minimum, meet the Tier 2 electric vehicle parking standards of the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.8.2.1.

- **Nonresidential Structures and Residential Structures with Four or More Stories.** For nonresidential land uses and residential land uses that are four or more stories, the Project Applicant(s)/Contractor(s) shall:
  - All parking areas shall be designed to provide parking for low-emitting, fuel-efficient, and carpool/van vehicles. At minimum, the number of preferential parking spaces shall equal the Tier 2 Nonresidential Voluntary Measures of CALGreen, Division A5.1, Planning and Design, Section A5.106.5.1.2.
  - Parking areas shall be designed to provide electric vehicle (EV) charging stations. At minimum, the number of EV charging stations shall comply with the Tier 2 Nonresidential Voluntary Measures of CALGreen, Division A5.1, Planning and Design, Section A5.106.5.3.3 or Section A5.106.5.3.4.

Mitigation Measure GHG-1b: Each Project Applicant/Contractor shall demonstrate a minimum 10 percent reduction in energy consumption below energy baselines. For the General Hospital, ASHRAE Standard 90.1-2010 shall be the energy baseline. For all other new construction and major renovation, the 2025 version of Title 24, Part 6 shall be the energy baseline. "New construction" in this context shall mean "ground up" development of a structure that has never been occupied. "Major renovation" in this context shall include additions to or redevelopment of existing structures resulting in an increase of over fifty (50) percent of the existing floor area. An overall energy reduction of 10 percent shall be demonstrated on an aggregate basis across the Project Site, allowing for some buildings to perform better than others. Compliance shall be demonstrated via:

- A technical memorandum (where energy reductions might be below 10% for individual buildings); or
- Title 24 compliance forms submitted at the time of permit (where energy reductions are above 10%); or
- An energy modeling report (for the General Hospital).

The technical memorandum shall be based on a project site-level energy calculation and reference Title 24 compliance forms where completed and available, and submitted to the County prior to issuance of each building permit. The 10 percent reduction in energy consumption may be achieved through a combination of Project Site-wide renewable energy generation, energy distribution systems, electrification, and/or building design features. The Project Site area energy calculations shall be based

on new developments pursuant to the project. The Project Site-level energy calculations shall be updated as needed throughout phased development to reflect actual design progress. Where performance of an individual building or phase is below the 10 percent requirement, it will address anticipated performance in future phases to achieve the aggregate 10 percent reduction.

Should the final development phase proposal show that the Project Site-wide 10 percent reduction in energy consumption was not achieved, the final phase development proposal shall include additional measures to ensure the Project Site-wide 10 percent reduction in energy consumption from the electrical grid be achieved. The "final development phase" is the phase that would complete the full buildout of the Project Site within the anticipated 25-year development horizon. If such phase is not realized within the 25-year development horizon, then the Proposed Project shall demonstrate the Project Site-wide 10 percent reduction no later than December 31st, 2050 through the implementation of additional measures. These additional measures may include but are not limited to photovoltaic arrays, appliance or mechanical system upgrades to new or existing buildings, or lighting upgrades on new or existing structures. Any such additional measures shall be quantified for energy consumption reduction performance and submitted to the County for approval prior to the issuance of construction permits for the final phase proposal.

Mitigation Measure GHG-1c: For nonresidential development projects, prior to issuance of the certificate of occupancy, the Project Applicant(s)/Contractor(s) shall provide documentation to the County demonstrating enrollment in a 100 percent carbon-free electricity energy plan, such as the City of Los Angeles Department of Water and Power's Green Power for Green LA program, for Proposed Project building(s) if such plan is available. If a 100 percent carbon-free electricity plan is not available, the Project Applicant(s)/Contractor(s) shall enroll in an energy plan with the next highest carbon-free electricity until a 100 percent carbon-free electricity energy plan becomes available. Measures to achieve 100 percent carbon-free electricity use may include, but are not limited to, plans for 100 percent renewable electricity. If such carbon-free electricity energy plans are waitlisted, the Project Applicant(s)/Contractor(s) may enroll in an available energy plan in the meantime, but shall sign up for the waiting list until such time a carbon-free electricity energy plan is available.

Mitigation: Implement Mitigation Measure AIR-2 and Mitigation Measure TRA-3d.

Impact GHG-2 **Mitigation:** Implement Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d.

Findings:

The County hereby adopts CEQA Findings 1 and 3. As described in the *Statement of Overriding Considerations*, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the Proposed Project outweigh its significant effects on the environment.

Facts in Support of Findings:

Impact GHG-1:

- Implementation of Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d could reduce GHG emissions impacts associated with future individual development activities under the Proposed Project to a less than significant level. Mitigation Measure TRA-3d would require the implementation of a Transportation Demand Management program to reduce vehicular trips to the Project Site. However, because the specifics of the potential future development projects accommodated under the Proposed Project are not known at the programmatic level, the extent to which individual future development activities would achieve GHG emissions below the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO2e)/year even with the identified reduction measures implemented cannot be determined. Accordingly, the analysis conservatively evaluates the maximum development potential under the Proposed Project to ensure that the GHG impacts are not underestimated. While implementation of mitigation measures would contribute to minimizing overall Proposed Project-related GHG emissions, it is anticipated that the Proposed Project would still exceed the South Coast AQMD bright-line threshold of 3,000 MTCO2e/year due to the magnitude of development accommodated under the Proposed Project. All feasible mitigation measures were considered in the Draft and Final SEIR. Therefore, Impact GHG-1 would remain significant and unavoidable.

Impact GHG-2:

- Implementation of Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d would contribute to minimizing Project-related GHG emissions to the extent feasible. However, due to the magnitude of emissions generated by the land uses that would be accommodated by the Proposed Project, long-term GHG emissions generated from the Proposed Project could still exceed the South Coast AQMD bright-line threshold of 3,000 MTCO2e/year. All feasible mitigation measures were considered in the Draft and Final SEIR. Therefore, Impact GHG-2 would remain significant and unavoidable.

CHAPTER 3.11, NOISE

Environmental Impact

The Proposed Project would have a significant and unavoidable impact related to noise as follows:

- **Impact NOI-1:** If pile driving activities or other high noise construction activities occur, construction activities associated with phased implementation of the Proposed Project have the potential to result in temporary noise increases in excess of applicable standards.
- **Impact NOI-2:** The Proposed Project has the potential to result in permanent noise increases in excess of applicable standards under operational conditions related to traffic.
- **Impact NOI-4:** Should pile driving be required during construction activities, such equipment would have the potential to result in groundborne vibration or noise in excess of applicable standards.
- **Impact NOI-5:** The Proposed Project's construction activities would result in cumulative impacts related to increases in ambient noise.
- **Impact NOI-6:** The Proposed Project's operational traffic would result in cumulative impacts related to increases in ambient noise.
- **Impact NOI-7:** The Proposed Project's construction activities would result in cumulative impacts related to the generation of groundborne vibration or noise in excess of applicable standards.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The measures as provided include any revisions incorporated in the Final SEIR that were made in the Final SEIR. As described in detail in the Final SEIR (Chapter 2, *Responses to Comments*), certain mitigation measure revisions or additions suggested by LAUSD (see responses to comments A3-8 and A3-9 of the Final SEIR) were determined to be either not applicable to the Proposed Project, or infeasible.

Impact NOI-1

Mitigation Measure NOI-1: Reduce Construction Noise to the Extent Possible. If construction activities associated with the Proposed Project have the potential to exceed the County's construction noise thresholds at nearby on- and off-site sensitive receptors, including during pile driving or other high noise construction activities, the Project Applicant(s)/Contractor(s) shall implement the following noise reduction measures during construction:

- To the extent feasible, construction activities shall occur between the hours of 7:00 am to 7:00 pm on Monday through Friday and 8:00 am to 6:00 pm on Saturdays, consistent with Section 12.08.520 of the

County of Los Angeles Code of Ordinances. Construction activities shall not occur at any time on Sundays or legal holidays. Construction personnel shall not be permitted on the job site, and material or equipment deliveries and collections should not be permitted outside of these hours. If construction activities must occur outside of the allowable hours, the Project Applicant(s)/Contractor(s) shall follow necessary procedures to obtain an appropriate variance in accordance with Section 12.08.580 of the County of Los Angeles Code of Ordinances prior to conducting such activities. Construction activities occurring outside the allowable hours shall comply with all conditions of the approved variance.

- To the fullest extent practicable, the quietest available type of construction equipment shall 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 feasible, impact pile driving shall be replaced with other piling techniques, such as vibratory pile driving or drilled and poured-in-place piles.
- All construction equipment shall be properly maintained. Poor maintenance of equipment typically causes excessive noise levels.
- All construction equipment, stationary and mobile, shall 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 and are properly maintained and functioning during construction activities. 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 shall 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 feasible, temporary barriers shall be employed around the Project Site and/or around noisy construction equipment, specifically pile driving equipment. For barriers to be effective they shall 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 shall provide a minimum sound transmission class (STC) rating of 28 and a minimum noise reduction coefficient (NRC) of 0.80 and shall be firmly secured to the framework with the sound absorptive side of the blankets oriented towards the construction equipment. The blankets shall be overlapped by at least 6" at seams and taped so that no gaps exist. The largest blankets available shall 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.

Impact NOI-2 No feasible mitigation available.

Impact NOI-4 **Mitigation Measure NOI-4: Reduce Construction-Generated Groundborne Vibration to the Extent Possible.** The Project Applicant(s)/Contractor(s) shall implement the following vibration reduction measures during construction:

- Through coordination with the County where possible, impact pile driving should be replaced with other piling techniques, such as vibratory pile driving or drilled and poured-in-place piles.
- Distance requirements for eligible or listed historical structures (as defined in Chapter 3.4, *Cultural Resources,* of this Draft SEIR):
  - Pile driving shall not be operated within 135 feet, vibratory rollers within 36 feet, or other heavy equipment (e.g., bulldozer) within 20 feet.
- Distance requirements for non-engineered and masonry buildings:
  - Pile driving shall not be operated within 100 feet, vibratory rollers within 25 feet, or other heavy equipment (e.g., bulldozer) within 15 feet.

Impact NOI-5 **Mitigation:** Implement Mitigation Measure NOI-1.

Impact NOI-6 **Mitigation:** Implement Mitigation Measure NOI-3a through NOI-3d.

Impact NOI-7 **Mitigation:** Implement Mitigation Measure NOI-4 and Mitigation Measure CUL-1c.

Findings:

The County hereby adopts CEQA Findings 1 and 3. As described in the *Statement of Overriding Considerations*, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the Proposed Project outweigh its significant effects on the environment.

Facts in Support of Findings:

Impact NOI-1:

- Construction activities associated with the Proposed Project would generate noise levels that could exceed applicable construction noise thresholds at nearby on- and off-site sensitive receptors. While the implementation of Mitigation Measure NOI-1 would reduce construction noise levels, certain construction activities, including potential pile driving, could still result in noise levels that exceed applicable thresholds. All feasible mitigation measures were considered in the Draft and Final SEIR. Because the potential for pile driving exists and construction noise impacts cannot be reduced to a less-than-significant level with mitigation, construction noise impacts would be significant and unavoidable.

Impact NOI-2:

- Existing noise levels along the segment of Marengo Street between Lord Street and State Street already exceed the applicable exterior noise standard (approximately 70 dBA CNEL); several existing residences are located adjacent to the roadway and are projected to experience an increase of approximately 3 dBA CNEL under Proposed Project conditions. Although this increase is considered perceptible, the ambient noise environment in this corridor already exceeds 65 dBA CNEL based on observed ambient noise measurements. A range of potential traffic noise mitigation measures was considered, but all such measures were determined to be infeasible. Installation of sound walls or other barriers along Marengo Street would require use of right-of-way that is not currently available, and while residential driveways are oriented toward Lord Street and State Street rather than Marengo Street, the presence of intersecting streets at both ends of the affected segment would still constrain barrier placement, limit effectual shielding, and reduce attenuation benefit to receptors. Additionally, any barrier tall enough to provide significant noise reduction would conflict with existing utilities, sidewalks, and required visibility zones near intersections.

  No feasible mitigation measures have been identified that would substantially reduce impacts associated with a substantial increase in traffic noise levels for all roadways showing significant impacts. For these reasons, the noise reduction measures evaluated were found

to be infeasible and are not recommended for implementation. Therefore, impacts would remain significant and unavoidable.

Impact NOI-4:

- While the implementation of Mitigation Measure NOI-4 would reduce construction vibration levels, if pile driving is required, Mitigation Measure NOI-4 would not reduce construction vibration impacts to a less that significant level. In addition, as it relates to vibration impacts to historic structures, Mitigation Measure CUL-1c shall be implemented, which requires that, prior to the commencement of construction activities adjacent to a historical resource, a Conditions Assessment Report will be completed by a Historic Architect to identify baseline conditions and a Monitoring Plan, prepared by a civil engineer, to establish survey monuments and document and record the positions of adjacent buildings, structures, sidewalks, utilities, facades, and surface features to form a baseline for determining settlement or deformation.

Impact NOI-5:

- Because the Proposed Project results in a significant and unavoidable impact to construction noise, the Proposed Project's contribution to cumulative construction noise is considered cumulatively considerable. While the implementation of Mitigation Measure NOI-1 would reduce construction noise levels at the Project Site, Mitigation Measure NOI-1 would not reduce construction noise impacts to a less than significant level if pile driving is conducted. If pile driving is not conducted, Mitigation Measure NOI-1 would reduce the Proposed Project's construction noise levels to a less-than-significant impact. All feasible mitigation measures were considered in the Draft and Final SEIR. Because there is a potential for pile driving to occur during construction, cumulative construction noise impacts are considered significant and unavoidable.

Impact NOI-6:

- Because the Proposed Project results in a significant and unavoidable impact to operational noise, the Proposed Project's contribution to cumulative operational noise is considered cumulatively considerable. With the implementation of Mitigation Measures NOI-3a through NOI-3d, operational impacts associated with the Proposed Project would be reduced to less than significant levels as these mitigation measures would ensure compliance with noise standards. However, no feasible mitigation measures have been identified to reduce traffic-related noise impacts and cumulative impacts would be significant and unavoidable.

Impact NOI-7:

- Because the Proposed Project results in a significant and unavoidable impact to construction vibration, the Proposed Project's contribution to cumulative vibration impacts is considered

cumulatively considerable. While the implementation of Mitigation Measure NOI-4 would reduce construction vibration impacts to a less that significant level under typical construction methods, if pile driving is required, cumulative impacts would be reduced but remain significant and unavoidable. All feasible mitigation measures were considered in the Draft and Final SEIR. In addition, as it relates to vibration impacts to historic structures, Mitigation Measure CUL-1c shall be implemented, which would ensure no indirect structural damage would occur.

RECREATION

Environmental Impact

The Proposed Project would have a significant and unavoidable impact related to recreation as follows:

- **Impact REC-1:** Construction of recreational facilities would potentially have an adverse effect on air quality, noise, and transportation.
- **Impact REC-3:** The Proposed Project, together with cumulative projects, would have a substantial construction impact on recreational facilities related to increases in ambient noise.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The measures as provided include any revisions incorporated in the Final SEIR that were made as a result of comments received on the Draft SEIR. As described in detail in the Final SEIR (Chapter 2, *Responses to Comments*), certain mitigation measure revisions or additions suggested by South Coast AQMD (see responses to comments A5-9, A5-10, and A5-11) and LAUSD (see responses to comments A3-5, A3-6, A3-8, and A3-9 of the Final SEIR) were determined to be either not applicable to the Proposed Project, or infeasible.

Impact REC-1	**Mitigation:** Implement Mitigation Measures AIR-1a through AIR-1b and NOI-1 and NOI 4.
Impact REC-3	**Mitigation:** Implement Mitigation Measures AIR-1a through AIR-1b and NOI-1 and NOI 4.

Findings:

The County hereby adopts CEQA Findings 1 and 3. As described in the *Statement of Overriding Considerations*, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the Proposed Project outweigh its significant effects on the environment.

Facts in Support of Findings:

Impact REC-1:

- Mitigation measures to reduce impacts to air quality are described in Chapter 3.2, *Air Quality*, of the Draft SEIR. Mitigation measures to reduce noise impacts are described in Chapter 3.11, *Noise*, of the Draft SEIR. Mitigation measures to reduce impacts to transportation are described in Chapter 3.15, *Transportation*, of the Draft SEIR. The Proposed Project would result in significant and unavoidable construction-related effects on the environment with respect to noise, which cannot be fully mitigated, as detailed in Chapter 3.11, *Noise*, of the Draft SEIR. Mitigation measures are applied to reduce the impacts to the extent feasible.

Impact REC-3:

- The Proposed Project would result in significant and unavoidable construction-related effects on the environment with respect to noise, which cannot be fully mitigated, as detailed in Chapter 3.11, *Noise*, of the Draft SEIR. Mitigation measures are applied to reduce the impacts to the extent feasible.

CHAPTER 3.15, TRANSPORTATION

Environmental Impact

The Proposed Project would have a significant and unavoidable impact related to transportation as follows:

- **Impact TRA-3:** Operation of the Proposed Project could create potentially significant impacts to geometric hazards due to queuing at four affected off-ramp locations.
- **Impact TRA-7:** Because the Proposed Project's operational traffic impacts are significant, the Proposed Project's contribution to cumulative geometric transportation hazards is considered cumulatively considerable.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The measures as provided include any revisions incorporated in the Final SEIR that were made as a result of comments received on the Draft SEIR. As described in detail in the Final SEIR (Chapter 2, *Responses to Comments*), certain mitigation measure revisions or additions suggested by LAUSD (see response to comments A3-10 and A3-11 of the Final SEIR), Caltrans (see responses to comments A4-7, A4-), and LADOT (see responses to comments A7-12 through A4-21) were determined to be either not applicable to the Proposed Project, or infeasible.

Impact TRA-3

Due to the programmatic nature of a 25-year buildout of the Proposed Project, and the multiple agency authorizations required to implement the measures herein: For all future developments as part of the Proposed Project, the Project Applicant(s)/Contractor(s) shall consult with County and relevant appropriate agencies to develop mechanisms as to when the conceptual improvements identified in Mitigation Measures TRA-3(a)-(e) are implemented based on phased buildout of the Proposed Project. The following three-step process shall be followed to determine whether a development project could result in Impact TRA-3.

Step 1: Determine whether cumulative land use, including the development, would exceed 15 percent of any single Proposed Land Use Category in the table below.

- If No: No further analysis is required, and no physical improvements are necessary.
- If Yes: Proceed to Step 2

Step 2: If a Proposed Project would result in any single Proposed Land Use exceeding 15 percent, prepare a trip generation and Transportation Demand Management (TDM) analysis.

Step 3: If the cumulative trips, after applying TDM strategies, would exceed the inbound or outbound trips associated with 15 percent of Proposed Project buildout, prepare a detailed off-ramp queuing analysis. The results of the off ramp queuing analysis will determine whether the development's trips, combined with cumulative trips, would result in a queuing impact at the identified off-ramp location.

Proposed Land Use	Units/Counts	Square Footage
Residential	3,200 housing units	2,300,000
General Office	--	400,000
Medical Office	--	735,300
Retail	--	320,000
Patient and Caregiver Lodging	200 rooms	80,000
Community Facilities	--	350,000
Education	--	110,000
Warehouse	--	160,000
Clean Tech/ Light Industrial	--	200,000
Hospital	450 beds	400,000
Parking	8,588 spaces	3,005,678

Proposed Land Use	Units/Counts	Square Footage
Total	**3,200 du 450 hospital beds 200 rooms 8,588 parking spaces**	**8,060,978 square feet of new development**

Mitigation Measure TRA-3a: The following traffic operations improvements shall be implemented to mitigate potentially significant impacts to off-ramp queuing at the I-5 southbound off-ramp to Mission Road.

- Re-stripe the off-ramp lane configuration from:
  - Left turn lane, shared through-left lane, and a right lane; to
  - two left turn lanes and one shared through-right turn lane.
- Optimize signal timing along the Mission Road coordinated corridor, including cycle length, offset, and phase splits.
- Apply the Caltrans' Intersection Safety Operational Assessment (ISOAP) methodology as appropriate to design and implement intersection improvements.
- Coordinate with Caltrans to evaluate expanding ramp storage using concrete/landscaped area in-between existing off-ramp and freeway mainline, and implement as determined by the appropriate implementing agencies.

Mitigation Measure TRA-3b: The following traffic operations improvements shall be implemented to mitigate potentially significant impacts to off-ramp queuing at the I-10 westbound off-ramp to State Street.

- Re-stripe the off-ramp lane configuration from:
  - Left turn lane, right turn lane; to
  - shared left-right turn lane and a right turn lane.
- Optimize signal timing along the State Street coordinated corridor, including cycle length, offset, and phase splits.
- Apply the Caltrans' ISOAP methodology as appropriate to design and implement intersection improvements.
- Coordinate with Caltrans to evaluate expanding ramp storage using landscaped slope area in-between existing off-ramp and freeway

connector (north side of off-ramp), and implement as determined by the appropriate implementing agencies.

Mitigation Measure TRA-3c: The following traffic operations improvements shall be implemented to mitigate potentially significant impacts to off-ramp queuing at the I-10 westbound off-ramp to Soto Street.

- Re-stripe the off-ramp lane configuration from:
  - Left turn lane, shared through-left turn lane, and two right turn lanes; to
  - two left turn lanes, one through lane, and one right turn lane.
- Optimize signal timing along the Soto Street coordinated corridor, including cycle length, offset, and phase splits.
- Apply the Caltrans' ISOAP methodology as appropriate to design and implement intersection improvements
- Coordinate with Caltrans and City to evaluate striped shoulder area along north side of existing off-ramp, and implement as determined by the appropriate implementing agencies.

Mitigation Measure TRA-3d: The following traffic operations improvements shall be implemented to mitigate potentially significant impacts to off-ramp queuing at the I-5 northbound off-ramp to Cesar Chavez Avenue.

- Optimize signal timing along the Cesar Chavez Avenue coordinated corridor, including cycle length, offset, and phase splits.
- Apply the Caltrans' ISOAP methodology as appropriate to design and implement intersection improvements.

Mitigation Measure TRA-3e: A TDM program shall be implemented as part of the individual development of projects aimed at reducing vehicular trips to the Project Site, which may mitigate Project-induced freeway off-ramp queuing hazards. Project Applicant(s)/Contractor(s) will incorporate TDM strategies and estimate their effectiveness. TDM strategies that the Proposed Project could implement to result in a quantitative reduction in vehicular trips include, but are not limited to, to the following:

- Trip Reduction Strategies
  - Implement Commute Trip Reduction Program (Voluntary for Mandatory)

  - Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring)
  - Implement Commute Trip Reduction Marketing
  - Provide Ridesharing Program
  - Implement Subsidized or Discounted Transit Program - All Trips
  - Provide End-of-Trip Bicycle Facilities
  - Provide Employer-Sponsored Vanpool
- Parking Strategies
  - Price workplace parking
  - Implement Employee Parking Cash-Out
  - Limit Residential Parking Supply
  - Unbundle Residential Parking Costs from Property Cost
- School
  - Coordinate with Los Angeles Unified School District (LAUSD) to establish a School Bus Program
  - Active Modes of Transportation for Youth

Impact TRA-7 **Mitigation:** Implement Mitigation Measures TRA-3a through TRA-3e.

Findings:

The County hereby adopts CEQA Findings 1, 2, and 3. Even with implementation of all feasible mitigation measures identified, this impact would remain significant and unavoidable. Additionally, improvements included as part of the mitigation are subject to coordination and approval with other jurisdictions (namely LADOT and Caltrans). However, as described in the *Statement of Overriding Considerations*, the County has determined that this impact is acceptable because such alterations are within the responsibility and jurisdiction of the California Department of Transportation (Caltrans) and not the agency making the finding and specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the Proposed Project outweigh its significant effects on the environment.

Facts in Support of Findings:

Impact TRA-3:

- Mitigation Measure TRA-3a through TRA-3e would reduce geometric hazards associated with freeway off-ramp queuing, but queues would still exceed available storage during at least one peak hour at each location, resulting in a significant and unavoidable impact.

Additionally, Mitigation Measure TRA-3a through TRA-3e are within the jurisdiction of Caltrans and coordination regarding timing and extent of improvements with that agency would be required.

Mitigation Measures TRA-3a through TRA-3d would reduce off-ramp queues; however, only the I-10 off-ramp to Soto Street would potentially operate within lane storage limits during both peak hours after mitigation. At the I-5 southbound off-ramp to Mission Road, the I-5 northbound off-ramp to Cesar Chavez Avenue, and the I-10 westbound off-ramp to State Street, 2050 with Project queues would still exceed available storage in the AM peak hour.

Mitigation Measures TRA-3a through TRA-3d would reduce off-ramp queueing by increasing vehicular throughput. However, those mitigation measures rely on longer signal cycles, which could increase pedestrian delay and degrade pedestrian level of service. Though the listed improvements do not add lanes, Caltrans generally recommends safety mitigation measures that do not adversely affect pedestrians or other vulnerable road users. Per the LDR Guidance, Caltrans generally recommends the following safety impact mitigation strategies:

- Transportation demand management (TDM) program(s) to reduce the project's trip generation, which may include increased transit access, commute trip reductions such as rideshare programs, shared mobility facilities (bicycle or vehicle), and increased bicycle and pedestrian infrastructure.
- Investments in existing active transportation infrastructure, or transit system amenities (or expansion) to reduce the project's trip generation.

  TDM programs can result in vehicle trip/VMT reductions due to certain types of Project Site modifications, programming, and operational changes. In turn, reductions in Proposed Project-generated vehicle trips would reduce the number of vehicles exiting the freeway to access the Project Site, reducing the effect on geometric hazards related to off-ramp queueing.

  The TDM options described herein are a list of strategies that future developments under the Proposed Project would consider for implementation. The strategies listed are described in greater detail in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA Handbook) (2024). The CAPCOA Handbook quantifies VMT and Greenhouse Gas (GHG) reductions associated with TDM strategies, factoring in project attributes such as land use type, workforce size, and resident characteristics.

  The TDM programs described in MM TRA-3e would be implemented at a project level, as appropriate as defined in the mitigation measure. Because the specific phasing, site design, land use mix, and operational characteristics of future project under the Proposed Project are not known at the programmatic level, the VMT and trip-reduction benefits of MM TRA-3e cannot be quantified at this time with a reasonable degree of certainty. Accordingly, the analysis conservatively evaluates transportation impacts based on the maximum development scenario.

Impact TRA-7:

- Because the Proposed Project results in a significant and unavoidable impact to geometric transportation hazards, the Proposed Project's contribution to cumulative transportation hazards is considered cumulatively considerable. All feasible mitigation measures were considered in the Draft and Final SEIR. While implementation of Mitigation Measure TRA-3a through TRA-3e would reduce impacts, it would not reduce transportation hazards impacts to a less than significant level. Cumulative impacts would be significant and unavoidable.

CHAPTER 3.17, UTILITIES AND SERVICE SYSTEMS

Environmental Impact

The Proposed Project would have a significant and unavoidable impact related to utilities and service systems as follows:

- **Impact USS-1:** Operation of the Proposed Project could have a water demand that exceeds the capacity of water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
- **Impact USS-2:** Operation of the Proposed Project could generate wastewater that exceeds the capacity at existing wastewater facilities.
- **Impact USS-3:** Operation of the Proposed Project, together with other past, present, and reasonably foreseeable projects within the LAPDW's service area, could have a water demand that exceeds the capacity of water supplies.
- **Impact USS-4:** Operation of the Proposed Project, together with other past, present, and reasonably foreseeable projects within the wastewater service area, could generate wastewater that exceeds the capacity at existing wastewater treatment facilities.

Mitigation Measures:

The following mitigation measures were included in the Draft SEIR and the Final SEIR and are applicable to the Proposed Project. The measures as provided include any revisions incorporated in the Final SEIR that were in the Final SEIR.

Impact USS-1

Mitigation Measure USS-1: As part of the site plan review for any future individual development project under the Proposed Project that is considered for construction and operation in 2045 or later, and that is also defined as a "water-demand project" in Section 15155 of the State CEQA Guidelines, the County shall request, pursuant to Section 15155, that the water provider, the City of Los Angeles Department of Water and Power (LADWP), determine whether the projected water demand associated with these project(s) was included in the most recently adopted urban water management plan. If required pursuant to Section 15155, the County shall request that LADWP prepare water supply

assessment(s) for these future projects. The County shall determine, pursuant to Section 15155, whether projected water supplies would be sufficient to satisfy the demands of the future project(s), in addition to existing and planned future uses within LADWP's service area.

Impact USS-2 **Mitigation Measure USS-2:** Prior to issuance of a building permit for a Project Applicant/Contractor under the Proposed Project that could result in an increase in wastewater generation, the Project Applicant(s)/Contractor(s) 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.

Impact USS-3 **Mitigation:** Implement Mitigation Measure USS-1.

Impact USS-4 **Mitigation:** Implement Mitigation Measure USS-2.

Findings:

The County hereby adopts CEQA Findings 1 and 3. As described in the *Statement of Overriding Considerations*, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the Proposed Project outweigh its significant effects on the environment.

Facts in Support of Findings:

Impact USS-1:

- Implementation of Mitigation Measure USS-1 would require the County to assess the availability of water supplies to accommodate future development with the Project Site that would be implemented beyond the year 2045. Because the Proposed Project is a long-term Master Plan, the timing and extent of future projects and the availability of water supplies beyond 22045 cannot be determined at the programmatic level. Accordingly, while Mitigation Measure USS-1 would require future evaluation of water supply availability, it cannot be confirmed at this time that sufficient water supplies would be available to serve all future development accommodated under the Proposed Project. Therefore, if it is determined that water supplies would not be sufficient to meet future water demands, impacts would remain significant and unavoidable.

Impact USS-2:

- Although the Proposed Project would implement Mitigation Measure USS-2 to reduce Project-related impacts, the need for future sewer conveyance improvements would depend on specific characteristics of future projects accommodated under the Proposed Project. Because the location, scale, timing, and funding of any required improvements cannot be determined at the programmatic level, the environmental impacts and effectiveness of such improvements cannot be evaluated with the information currently available. Because the location, scale, and timing of potential conveyance improvements have not been identified and the environmental impacts of such improvements cannot be determined with the information currently available, it cannot be concluded that wastewater impacts would be reduced to a less-than-significant level. All feasible mitigation measures were considered in the Draft and Final SEIR. Therefore, the Proposed Project's impact on the capacity of existing wastewater facilities would remain significant and unavoidable.

Impact USS-3:

- Implementation of Mitigation Measure USS-1 would assess the availability of water supplies to accommodate future development that would be implemented beyond the year 2045. Because the Proposed Project is a long-term Master Plan, the timing and extent of future projects and the availability of water supplies beyond 22045 cannot be determined at the programmatic level. Accordingly, while Mitigation Measure USS-1 would require future evaluation of water supply availability, it cannot be confirmed at this time that sufficient water supplies would be available to serve all future development accommodated under the Proposed Project. Therefore, the Proposed Project's contribution to cumulative water supply impacts would be cumulatively considerable if it is determined that water supplies would not be sufficient to meet future water demands. All feasible mitigation measures were considered in the Draft and Final SEIR. Therefore, impacts would remain significant and unavoidable.

Impact USS-4:

- Although the Proposed Project would implement Mitigation Measure USS-2 to reduce Project-related impacts, the need for future sewer conveyance improvements would depend on specific characteristics of future projects accommodated under the Proposed Project. Because the location, scale, timing, and funding of any required improvements cannot be determined at the programmatic level, the environmental impacts and effectiveness of such improvements cannot be evaluated with the information currently available. Because the location, scale, and timing of potential conveyance improvements have not been identified and the environmental impacts of such improvements cannot be determined with the information currently available, it cannot be concluded that cumulative wastewater impacts would be reduced to a less-than-significant level. All feasible mitigation measures were considered in the Draft and Final SEIR. Therefore, the Proposed Project's contribution to cumulative wastewater impacts would be cumulatively considerable, and cumulative impacts would remain significant and unavoidable.

V. ALTERNATIVES TO THE PROPOSED PROJECT

Alternatives Considered and Rejected During the Scoping/Project Planning Process

The following is a discussion of alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the Draft SEIR.

NO PROJECT/NO REDEVELOPMENT ALTERNATIVE

The No Project/No Redevelopment Alternative would involve continued operation of the Project Site as currently developed but would not allow development pursuant to existing entitlements and approvals (namely the 2014 Master Plan). Routine maintenance and updates to existing buildings would continue to occur; however, no redevelopment pursuant to the approved 2014 Master Plan would occur. No demolition of existing structures would occur, and the critical seismic upgrades to support the adaptive reuse of the General Hospital Building, as further detailed under the Proposed Project, would not be implemented through a public-private partnership or any other means. No new environmental impacts would occur with this alternative due to the lack of future development, and this alternative would be inconsistent with the prior approvals the County has issued for the Project Site. Because this alternative would not allow implementation of the Proposed Project or redevelopment of the Campus consistent with the previously approved 2014 Master Plan framework, it would not achieve several key objectives of the Proposed Project, including objectives related to modernization of Campus facilities, adaptive reuse of existing structure, implementation of a coordinated long-term planning framework for the Campus, and accommodating future growth in employment, housing, and supporting uses. Additionally, as the Project Site is owned by the County and the County has elected to show consistency with the County of Los Angeles General Plan 2035, this alternative would be inconsistent with the County of Los Angeles General Plan 2035 objectives. Specifically, this alternative would not meet the County's goal of accommodating new housing and jobs in anticipation of population growth in the County and the region. Moreover, this alternative would not help the City or County meet its Regional Housing Needs Assessment goals because no new residential uses would be developed within the County. Additionally, without implementation of redevelopment activities that include rehabilitation, stabilization, or replacement of aging structures, certain historic resources could continue to deteriorate over time due to age, deferred maintenance, and ongoing operational wear. Continued deterioration of historic resources may result in the gradual loss of historic integrity, which could represent an adverse outcome for cultural resources. Therefore, the County finds that the No Project/No Redevelopment Alternative is not feasible.

While the No Project/No Redevelopment Alternative would avoid many of the environmental impacts associated with redevelopment of the Campus, CEQA requires that alternatives be capable of feasibly attaining most of the basic objectives of the Proposed Project. Because this

alternative would not implement the Campus modernization or long-term planning framework contemplated by the Proposed Project, it would not feasibly attain most of the Proposed Project's fundamental objectives.

ALTERNATE SITE ALTERNATIVE

CEQA requires that the discussion of alternatives focus on alternatives to the Proposed Project or its location, which are capable of avoiding or substantially lessening any significant effects of the Proposed Project while feasibly attaining most of the project's basic objectives. The key parts of the alternative location analysis are (1) the availability of alternative locations that are of necessary size and location that are available or owned by the applicant and (2) the consistency of the selected alternative location(s) with Proposed Project objectives and County adopted plans. Further, the analysis focuses on whether any of the significant effects of the Proposed Project would be avoided or substantially lessened by developing the Proposed Project at another location. Only alternate locations that would avoid or substantially lessen any of the significant effects of the Proposed Project need be considered for inclusion in the Draft SEIR (State CEQA Guidelines, Section 15126.6[f][2][A]).

As detailed in Chapter 3, *Project Description*, of the Draft SEIR, the Project Site is owned by the County of Los Angeles and is located within the boundaries of the City of Los Angeles. The Project Site is developed with buildings and structures that support the existing Medical Center. All existing and future development plans for the Proposed Project would occur within the Project Site.

In considering the feasibility of alternate locations, the County evaluated general planning considerations such as the availability of sites of sufficient size (approximately 81.9 acres) to accommodate the Proposed Project, proximity to the existing Campus and the communities it serves, access to existing infrastructure and transit, and compatibility with surrounding land uses. Based on these considerations, no alternative sites were identified that would feasibly accommodate the Proposed Project while meeting most of its basic objectives.

The Proposed Project is intended to occur within the existing Campus and involves redevelopment and integration of multiple facilities, including existing buildings and new development that support institutional, residential, and supporting uses. As a result, implementation of the Proposed Project requires a site of sufficient size to accommodate these uses within an integrated campus environment and to allow coordination with existing facilities, infrastructure, and circulation systems. Many potential sites within the surrounding urbanized area would not provide the necessary size or configuration to support this type of integrated campus development.

In order to achieve an integrated Campus environment, the Alternate Site must be comprised of parcels or areas that are contiguous or immediately proximate to each other, of adequate size, within the City of Los Angeles, and owned by the County and capable of functioning as part of a coordinated campus. The existing Los Angeles County General Hospital Campus, consists of

multiple parcels located in proximity to one another, including parcels separated by public streets such as Marengo Street, Zonal Avenue, and Mission Road, but operate collectively as a single Campus. Any alternate location must contain enough available space for infill development and not otherwise jeopardize County operational needs and functions.

Maintaining development within the existing Campus area allows for operational coordination between facilities, shared infrastructure and utilities, and efficient circulation for patients, staff, and emergency services. Locating project components at sites outside of the immediate Campus area would reduce operational efficiency, complicate coordination of medical services and support functions, and limit the ability to utilize existing infrastructure that supports the Campus. Accordingly, alternate sites located outside the immediate Campus area would not feasibly attain most of the fundamental objectives of the Proposed Project.

An alternate site would require purchase or negotiation of long-term leases, introducing uncertainty and potential delays. The availability of a County-controlled site would increase project feasibility. Additionally, relocating the Proposed Project to a different site, particularly a site without existing medical institution, would require greater environmental disturbance and a more extensive entitlement process, and could generate land use compatibility issues. Specifically, relocating the Proposed Project to a different site could require additional land use approvals depending on the zoning and land use designations of the alternate location, particularly if the site is not currently developed or planned for large-scale institutional or medical uses. Establishing a new medical or institutional campus at an alternate location could introduce land use compatibility considerations and require additional discretionary approvals. In contrast, the Project Site is already developed as part of the Los Angeles General Hospital Campus and contains existing buildings, infrastructure, and circulation systems that support medical and institutional uses. Development within the existing Campus area allows the County to utilize this established institutional setting and existing infrastructure rather than developing a new medical complex at a different location.

Because the Proposed Project's objectives are centered on redevelopment and modernization of the existing Campus, including adaptive reuse of existing facilities and implementation of a coordinated Campus planning framework, development at an alternate location would not feasibly attain most of the fundamental objectives of the Proposed Project. Additionally, Objective 6 of the Proposed Project's objectives is intended to provide uses that do not exist at the Project Site, which include commercial, residential, and educational uses. Moreover, the Project Site is strategically located within an established urban area of the City of Los Angeles that is well served by public transit and proximate to the populations and communities the facilities are intended to serve. Because the Project Site is already developed and contains existing structures, infrastructure, and disturbance areas that support the existing operation of the Campus, redevelopment on the Project Site allows the County to build upon an established medical campus. While alternate locations could be identified within urbanized areas, such site may not provide the same existing infrastructure or operational integration as the Project Site and could require additional site assembly, redevelopment, or land use transitions to

accommodate the Proposed Project. Alternative locations may not provide comparable accessibility to transit connectivity. Additionally, this alternative would not meet the Proposed Project's objectives relating to economic development because the County-owned site is currently underutilized. Moreover, this alternative would not include the preservation or protection of historic resources on-site.

Based on the foregoing analysis, an Alternative Site is not considered to be a feasible alternative for the Proposed Project. Additionally, the Proposed Project proposes to include existing development on the Project Site because the Campus functions as an interconnected facilities, infrastructure, and circulation systems. The Proposed Project involves the redevelopment, modernization, and adaptive reuse of existing facilities, which can only occur on the existing campus. Inclusion of the existing development allows the County to plan comprehensively for the long-term operation of the Campus, including coordination of land uses, infrastructure, circulation, and supporting services. Development at an alternate site would not facilitate modernization or adaptive reuse of the existing campus facilities and would not allow implementation of the coordinated campus planning framework contemplated by the Proposed Project.

PHASED/DELAYED ALTERNATIVE

The Phased/Delayed Alternative would propose the same overall development program under the Proposed Project and within the 25-year planning horizon; however, buildout would occur more gradually, over an extended duration. This alternative would concentrate major construction activities toward the latter years of the plan and could potentially result in reduced environmental effects if future construction technologies, energy efficiency standards, or regional transportation infrastructure improvements further reduce emissions or energy demand. However, the extent and timing of such improvements are uncertain and cannot be assumed with certainty for purposes of this analysis.

Accordingly, while delayed implementation could potentially allow the Project to benefit from future technological or regulatory improvements, these potential benefits are speculative and cannot be relied upon to substantially lessen the significant environmental impacts identified for the Proposed Project.

While the Phased/Delayed Alternative could eventually achieve the same overall development program as the Proposed Project, implementation of key components would occur over a longer timeframe. As a result, this alternative would delay achievement of several important objectives of the Proposed Project, including modernization of campus facilities and adaptive reuse of the General Hospital Building. Delaying these improvements could prolong reliance on aging infrastructure and postpone the operational and planning benefits associated with the Proposed Project.

Initial phases would focus on modernization, renovation, and lower-intensity improvements that generate fewer emissions and result in reduced environmental effects in the near term.

However, this reduction would be temporary and limited to early construction phases. Under this alternative, the same overall development program would ultimately be implemented, and subsequent construction phases would generate emissions, noise, and other environmental effects similar in intensity and duration to those identified for the Proposed Project.

In addition, operational impacts at full buildout would be substantially similar to those of the Proposed Project because the total amount, intensity, and type of development would not change. As a result, while near-term construction impacts may be incrementally reduced or deferred in the near team, this alternative would not avoid or substantially lessen the Proposed Project's significant and unavoidable impacts, including air quality, cultural resources, GHG emissions, noise, recreation, and transportation, which are primarily driven by the overall scale of development and long-term operations.

Alternatives Selected for Further Analysis

The following alternatives were determined to represent a reasonable range of alternatives because they would attain most of the basic objectives of the Proposed Project and avoid or substantially lessen any of the significant effects of the project. Any other options as described above were not considered to meet the basic project objectives or reduce or substantially reduce impacts.

ALTERNATIVE A: NO PROJECT/2014 MASTER PLAN DEVELOPMENT

According to Section 15156.6(e) of the State CEQA Guidelines, a "no project" alternative shall be evaluated to allow decisionmakers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. Additionally, the no project alternative may represent the continuation of an existing land use or ongoing operation into the future. Thus, the no project alternative represents a continuation of redevelopment uses identified in the previously approved 2014 Master Plan, which was analyzed in the 2014 Master Plan EIR, subsequent addenda, and exemption.

Under the No Project/2014 Master Plan Development (Alternative A), the Proposed Project would not be implemented and the approved 2014 Master Plan would allow for continued operation and incremental modernization of the Medical Center Campus, allowing for renovation, replacement, and expansion of existing buildings and utility infrastructure as needed to support ongoing medical, administrative, and supportive functions. Alternative A would also result in an enhanced connection between the east and west portions of the Project Site. No new comprehensive redevelopment or reconfiguration of the Campus would occur beyond what is currently approved. This alternative would allow for approximately 827,801 square feet of demolition and approximately 1,157,070 square feet of new construction — including a proposed 450-bed hospital (400,000 square feet) on the Project Site—consistent with the approved 2014 Master Plan framework. No adaptive reuse of the General Hospital Building would occur.

The Project Site would, therefore, remain developed consistent with prior County approvals, and future improvements would continue to occur in response to operational needs and regulatory requirements, as determined by the County. Overall, Alternative A would result in an approximately 83 percent reduction in development buildout when compared to the Proposed Project. Alternative A would result in less demolition and less new development.

Alternative A would generally reduce short-term environmental impacts associated with construction, including aesthetics, air quality, energy, GHG, noise and vibration, population and housing, public services, recreation, transportation, and utilities and service systems because it would avoid the scale and intensity of construction and redevelopment associated with the Proposed Project. However, several operational impacts would remain when compared to the Proposed Project. Specifically, Alternative A would reduce construction impacts related to aesthetics, air quality, energy, GHG, population and housing, public services, construction noise and vibration, recreation, transportation, and utilities and service systems. Certain operational impacts related to environmental topics areas such as transportation (vehicle trips), air quality and GHG emissions (vehicle and building operations), noise (routine vehicle activity and maintenance), and utilities and energy (continued operation of aging infrastructure), would be similar to existing conditions and, therefore, similar to or slightly reduced compared to the Proposed Project.

Alternative A would reduce most of the Proposed Project's significant and unavoidable impacts; however, these impacts would not be avoided. Critically, Alternative A would increase impacts on cultural resources and would not address existing deficiencies in open space, and sustainability. Additionally, the continuation of aging infrastructure and outdated site design could exacerbate cumulative impacts over time. This alternative would not include a residential component. Thus, this alternative would not maximize the provision of new housing to address the housing needs of the county and the greater Los Angeles region. Alternative A would provide opportunities for employment to the area; however, due to the reduction in development as compared to the Proposed Project, this alternative would generate less opportunities for employment as compared to the Proposed Project. Thus, this alternative would only partially promote economic and workforce development. Overall, while Alternative A would reduce impacts, this alternative would not address existing deficiencies and would forego the long-term environmental benefits associated with comprehensive redevelopment.

Findings:

The County finds that while Alternative A would reduce short-term construction impacts and would avoid the Proposed Project's operational air quality impacts, it would not achieve the long-term environmental and operational benefits, such as co-locating jobs and housing, provided by the Proposed Project. By relying on the 2014 Master Plan and retaining the existing development pattern, the alternative does not support the County's long-term vision for a modern, integrated, health-supportive campus. Overall, Alternative A is less environmentally advantageous over the long term and would partially meet the Proposed General Hospital

objectives, but would not achieve the same level of flexibility, housing delivery, sustainability, or long-term resilience as the Proposed Project.

ALTERNATIVE B: GENERAL HOSPITAL ADAPTIVE REUSE

Under the General Hospital Adaptive Reuse Alternative (Alternative B), redevelopment within the Project Site would be limited to the adaptive reuse of the General Hospital Building and immediately adjacent areas within the Los Angeles General Hospital–Acute Building Historic District. No new construction beyond the rehabilitation, critical seismic strengthening, and interior reconfiguration of the General Hospital to support the adaptive reuse and occupation of the General Hospital Building would occur. Broader Project Site redevelopment components included in the Proposed Project, such as additional new housing, new medical or administrative facilities, open space enhancements, circulation improvements, and Project Site-wide utilities upgrades would not be implemented. This alternative focuses solely on restoring the historic General Hospital Building for continued use but does not pursue the comprehensive, multi-use redevelopment envisioned in the Proposed Project.

Alternative B would result in a mixed range of environmental effects relative to the Proposed Project. Alternative B would largely avoid the majority of construction-related impacts associated with new building development elsewhere on the Project Site. This includes reduced construction-related impacts including noise, vibration, air quality, GHG emissions, and transportation. The footprint of construction activity would be substantially smaller than under the Proposed Project. In addition, Alternative B would reduce the Proposed Project's significant and unavoidable transportation hazards impact; however, impacts would remain significant and unavoidable. This alternative would avoid the Proposed Project's potentially significant and unavoidable impacts on historic resources.

The adaptive reuse of the General Hospital Building would still require interior renovation, seismic upgrades, and building systems replacement, which would result in similar types of construction impacts as the Proposed Project but at a much smaller scale. PDFs 1 through 3 would be implemented for Alternative B to ensure compliance with the existing Standards, thereby reducing historic impacts.

While construction impacts would be reduced, Alternative B may result in greater long-term impacts related to utilities, energy efficiency, and infrastructure performance, because the remainder of the Project Site would not be modernized. Aging pipes, electrical systems, stormwater infrastructure, and circulation deficiencies would remain in place. This alternative would not achieve the long-term environmental performance improvements associated with Project Site-wide modernization under the Proposed Project.

Findings:

The County finds that Alternative B would provide benefits in preserving the historic General Hospital Building. Alternative B meets the adaptive reuse objective most effectively, and

partially advances the housing and economic development objectives of the Proposed Project. However, due to the limited geographic scope of improvements, Alternative B would not meet the majority of the Proposed Project's objectives and would not achieve the County's long-term vision for a modern, integrated health supportive campus. Overall, Alternative B would partially meet certain objectives, particularly those related to historic preservation and limited economic activation, but would not adequately meet healthcare, housing, infrastructure, and long-term planning objectives compared to the Proposed Project.

ALTERNATIVE C: REDUCED DENSITY MEDICAL CAMPUS ALTERNATIVE

The Reduced Density Medical Campus Alternative (Alternative C), would allow for the demolition of previously approved buildings and structures approved for demolition under the 2014 Master Plan, buildings and structures proposed for demolition under the Proposed Project, and redevelopment of the Project Site, over a 25-year horizon, with uses related to the medical and community-serving uses included by the Proposed Project. Alternative C would implement the Proposed Project with a focus on medical-related uses and would not include the adaptive reuse of the approximately 1.2-million-square-foot General Hospital Building. Under the Proposed Project, the General Hospital Building could accommodate a mix of residential, commercial, office, patient and caregiver lodging, and community facility uses. Under Alternative C, these uses would not occur, and the building would remain unused or be retained for future determination. No residential, general office, retail, patient and care giver lodging, education, or clean tech/advanced industrial uses would be developed under Alternative C.

Alternative C would result in a mixed range of environmental effects relative to the Proposed Project. Alternative C would reduce construction-related impacts associated with new building development elsewhere on the Project Site. This includes reduced construction noise, vibration, air quality, GHG emissions, and transportation impacts. The footprint of new construction activity would be substantially smaller than under the Proposed Project, though site-wide demolition and utility improvements would occur. In addition, Alternative C would reduce the Proposed Project's significant and unavoidable transportation hazards impact; however, this alternative may not avoid this impact.

Similar to the Proposed Project, the ultimate location and massing of potential structures in relation to existing historic buildings to remain (i.e., the Old Administration Building, Los Angeles General Hospital–Acute Building and historic district) is unknown. Mitigation Measure CUL-1 would be implemented; however, impacts are assumed to remain significant and unavoidable, similar to the Proposed Project. However, because adaptive reuse of the General

Hospital Building would not occur, impacts on historic resources have the potential to be greater.

Findings:

The County finds that Alternative C would reduce construction-related impacts compared to the Proposed Project due to the reduced scale of redevelopment. However, significant and unavoidable impacts would remain. In addition, because Alternative C would not include improvements to or adaptive reuse of the General Hospital Building, it has the potential to result in greater long-term environmental impacts associated with the continued deterioration of this historic resource. While Alternative C would reduce the severity of certain significant and unavoidable impacts associated with the Proposed Project, it would not eliminate those impacts and would not achieve key project objectives related to rehabilitation and adaptive reuse of the General Hospital Building.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As presented above, Alternative A, Alternative B, Alternative C would reduce certain environmental impacts compared to the Proposed Project. However, the scale and nature of the reductions vary. Alternative A would reduce construction-related impacts of the Proposed Project, but impacts would remain significant and unavoidable.

The environmental inferiority of Alternative A is driven by its land use pattern. Alternative A would continue to concentrate non-residential, job-generating uses in an area with a high concentration of employment and relatively low residential density, perpetuating a job–housing imbalance. However, this alternative would avoid the Proposed Project's significant and unavoidable impacts related to transportation hazard. Improvements on the Project Site would be based on the framework identified in the 2014 Master Plan. Under Alternative A, required safety/maintenance upgrades and infrastructure upgrades necessary to support continued use of the Campus would remain. Alternative A would result in greater overall environmental disturbance than Alternative B due to infrastructure relocation and broader Campus upgrades.

Alternative B would substantially reduce construction-related impacts compared to Alternative A and the Proposed Project by limiting redevelopment to the adaptive reuse of the General Hospital and Los Angeles General Hospital–Acute Building Historic District. This alternative would avoid the extensive Project Site-wide development footprint of the Proposed Project while still providing long-term environmental and community serving benefits with rehabilitation of the historic structure. Alternative B would reduce the Proposed Project's significant and unavoidable impacts; however, these impacts would remain significant and unavoidable.

Alternative C would reduce construction-related impacts of the Proposed Project, but impacts would remain significant and unavoidable. Alternative C has the potential to result in greater long-term environmental impacts due to lack of improvements to the General Hospital Building.

Alternative C would result in greater overall environmental disturbance than Alternative A and B as this alternative would result in demolition and construction across the Project Site. Alternative C would reduce the Proposed Project's significant and unavoidable impacts; however, these impacts would remain significant and unavoidable.

Based on the comparative analysis presented in the Draft SEIR, Alternative B is identified as the Environmentally Superior Alternative. While this alternative would not meet all of the Proposed Project's objectives, with respect to providing a mix of housing, job opportunities, varied land uses, community benefits, and developing a comprehensive planning and entitlement framework, this alternative would result in fewer overall environmental impacts than Alternatives A and C. When weighing both construction and operational impacts, Alternative B presents the most balanced and environmentally advantageous outcome among the alternatives evaluated.

In accordance with State CEQA Guidelines Section 15126.6(e)(2), Alternative B is identified as the Environmentally Superior Alternative because it would:

- Reduce the magnitude of the Proposed Project's greatest impacts,
- Avoid the long-term environmental drawbacks of the No Project Alternative, and

Provide meaningful environmental and historic benefits through reuse of the existing General Hospital Building and Los Angeles General Hospital–Acute Building Historic District.

This page intentionally left blank.