Martin Luther King, Jr. Medical Center Campus Redevelopment

Draft Environmental Impact Report
(SCH#2010031040)

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August 31, 2010

TABLE OF CONTENTS

SECTIONS **PAGE**

ES EXECUTIVE SUMMARY ES-1

ES.1 Existing Facilities ES-1
ES.2 Proposed Project ES-1
ES.2.1 Tier I ES-1
ES.2.2 Tier II ES-1
ES.3 Issues to be Resolved ES-2
ES.4 Summary of Impacts ES-2
ES.6 Project Alternatives ES-25

1.0 INTRODUCTION 1-1

1.1 Purpose and Scope of the EIR 1-1
1.1.1 Intent of CEQA 1-1
1.1.2 Environmental Review Process 1-2
1.2 Organization and Content 1-5

2.0 PROJECT DESCRIPTION 2-1

2.1 Proposed Project Location 2-1
2.2 Background and Existing Conditions 2-1
2.2.1 Background 2-1
2.2.2 Existing Structures 2-3
2.2.2.1 Genesis Clinic 2-4
2.2.2.2 Oasis Clinic (Old) 2-5
2.2.2.3 Oasis Clinic (New) 2-5
2.2.2.4 Registration Building 2-5
2.2.2.5 Augustus F. Hawkins Comprehensive Mental Health Center 2-5
2.2.2.6 Inpatient Tower 2-5
2.2.2.7 Multi-service Ambulatory Care Center Building 2-6
2.2.2.8 Pediatric Acute Care Building 2-6
2.2.2.9 Medical Records and Laundry Building 2-6
2.2.2.10 Central Plant 2-6
2.2.2.11 Plant Management Building 2-7
2.2.2.12 North Support Building 2-7
2.2.2.13 South Support Building 2-7
2.2.2.14 Interns and Physicians Building 2-7
2.2.2.15 Emergency Room 2-8
2.2.2.16 Storage Building 2-8
2.2.2.17 Magnetic Resonance Imaging Building 2-8
2.2.2.18 Claude Hudson Auditorium 2-8
2.2.2.19 Cooling Towers 2-8
2.2.2.20 Hub Clinic 2-8
2.2.2.21 Storage Building 2-9
2.2.2.22 Additional Support Structures 2-9

2.2.3 Existing Operational Conditions 2-9
2.2.3.1 Patient Volume 2-11
2.2.3.2 Accessibility 2-11
2.2.3.3 Parking 2-11
2.2.3.4 Public Transportation 2-13
2.2.3.5 Utilities 2-13
2.2.3.6 Water Use 2-14
2.2.4 Existing Campus Surroundings 2-14
2.2.4.1 Charles Drew University of Medicine and Science 2-14
2.2.4.2 Rosa Parks Transit Station 2-15
2.2.4.3 Other Surrounding Uses 2-15
2.2.5 General Plan Land Use Designation 2-15
2.2.6 Zoning 2-15
2.3 Statement of Project Goal and Objectives 2-16
2.3.1 Goal 2-16
2.3.2 Tier I: Project Development Objectives 2-17
2.3.3 Tier II: Master Plan Development Objectives 2-17
2.4 Proposed Project 2-18
2.4.1 Tier I: Project Development 2-22
2.4.1.1 Multi-service Ambulatory Care Center Building 2-23
2.4.1.2 Ancillary Building 2-23
2.4.1.3 Tenant Improvements 2-23
2.4.1.4 Site Improvements 2-23
2.4.2 Tier II: Master Plan Development 2-24
2.4.3 National Environmental Policy Act Compliance 2-25
2.4.4 Construction Scenario 2-26
2.4.4.1 Tier I Construction Scenario 2-26
2.4.4.2 Tier II Construction Scenario 2-30
2.5 Intended Uses of the EIR 2-30
2.6 Related Projects 2-31
2.7 Project Alternatives 2-34

3.0 EXISTING CONDITIONS, IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION 3-1

3.1 Aesthetics 3.1-1
3.1.1 Regulatory Framework 3.1-1
3.1.2 Existing Conditions 3.1-5
3.1.2.1 Scenic Vistas 3.1-5
3.1.2.2 Scenic Highways and Resources 3.1-6
3.1.2.3 Visual Character 3.1-7
3.1.2.4 Shade and Shadow 3.1-8
3.1.2.5 Light and Glare 3.1-8
3.1.3 Significance Thresholds 3.1-8
3.1.4 Impact Analysis 3.1-9
3.1.4.1 Scenic Vistas 3.1-9
3.1.4.2 State Scenic Highways and Resources 3.1-11
3.1.4.3 Visual Character 3.1-12
3.1.4.4 Daytime: Shade and Shadow 3.1-13
3.1.4.5 Daytime and Nighttime: Light and Glare 3.1-15

3.1.4.6 Cumulative Impacts 3.1-16
3.1.5 Mitigation Measures 3.1-10
3.1.6 Level of Significance after Mitigation 3.1-20

3.2 Air Quality 3.2-1
3.2.1 Regulatory Framework 3.2-2
3.2.2 Existing Conditions 3.2-6
3.2.2.1 South Coast Air Basin 3.2-6
3.2.2.2 Temperature Inversions 3.2-7
3.2.2.3 Climatic Conditions 3.2-7
3.2.2.4 Emission Sources 3.2-8
3.2.2.5 Community of Willowbrook Air Quality 3.2-8
3.2.2.6 Source Receptor Area 3.2-8
3.2.2.7 Sensitive Receptors 3.2-9
3.2.3 Significance Thresholds 3.2-10
3.2.3.1 Construction Phase Significance Criteria 3.2-11
3.2.3.2 Operational Phase Significance Criteria 3.2-12
3.2.4 Impact Analysis 3.2-13
3.2.4.1 Assessment Methods and Models 3.2-13
3.2.4.2 Construction Impacts 3.2-15
3.2.4.3 Operational Impacts 3.2-20
3.2.4.4 Cumulative Impacts 3.2-23
3.2.5 Mitigation Measures 3.2-24
3.2.6 Level of Significance after Mitigation 3.2-28

3.3 Cultural Resources 3.3-1
3.3.1 Regulatory Framework 3.3-1
3.3.2 Existing Conditions 3.3-8
3.3.2.1 Paleontological Resources 3.3-9
3.3.2.2 Archaeological Resources 3.3-9
3.3.2.3 Historical Resources 3.3-10
3.3.2.4 Human Remains 3.3-18
3.3.3 Significance Thresholds 3.3-18
3.3.4 Impact Analysis 3.3-19
3.3.4.1 Paleontological Resources 3.3-19
3.3.4.2 Archaeological Resources 3.3-20
3.3.4.3 Historical Resources 3.3-21
3.3.4.4 Human Remains 3.3-25
3.3.4.5 Cumulative Impacts 3.3-26
3.3.5 Mitigation Measures 3.3-27
3.3.6 Level of Significance after Mitigation 3.3-33

3.4 Geology and Soils 3.4-1
3.4.1 Regulatory Framework 3.4-1
3.4.2 Existing Conditions 3.4-5
3.4.2.1 Physiography and Topography 3.4-5
3.4.2.2 Surficial Geologic Units 3.4-5
3.4.2.3 Faulting and Seismicity 3.4-5
3.4.2.4 Soils 3.4-6
3.4.2.5 Hydrology 3.4-6

3.4.3 Significance Thresholds 3.4-7
3.4.4 Impact Analysis 3.4-7
3.4.4.1 Surface Fault Rupture 3.4-7
3.4.4.2 Seismic Ground Shaking 3.4-8
3.4.4.3 Seismic-Related Ground Failure/Liquefaction 3.4-9
3.4.4.4 Landslides 3.4-10
3.4.4.5 Soil Erosion 3.4-10
3.4.4.6 Stability of Geology and Soils 3-11
3.4.4.7 Expansive Soil 3.4-13
3.4.4.8 Septic Tanks or Alternative Waste Water Disposal Systems 3.4-13
3.4.4.9 Cumulative Impacts 3.4-14
3.4.5 Mitigation Measures 3.4-15
3.4.6 Level of Significance after Mitigation 3.4-16

3.5 Greenhouse Gas Emissions 3.5-1
3.5.1 Regulatory Framework 3.5-4
3.5.2 Existing Conditions 3.5-14
3.5.3 Significance Thresholds 3.5-14
3.5.4 Impact Analysis 3.5-15
3.5.5 Mitigation Measures 3.5-24
3.5.6 Level of Significance after Mitigation 3.5-26

3.6 Hazards and Hazardous Materials 3.6-1
3.6.1 Regulatory Framework 3.6-1
3.6.2 Existing Conditions 3.6-4
3.6.2.1 Routine Transport, Use, or Disposal of Hazardous Materials 3.6-4
3.6.2.2 Release of Hazardous Materials Into the Environment .. 3.6-4
3.6.2.3 Existing or Proposed Schools 3.6.5
3.6.2.4 Hazardous Materials Sites Pursuant to Government Code Section 65962.5 ..... 3.6-5
3.6.2.5 Proposed Project Site Located in an Airport Land Use Plan, within 2 Miles of a Public Airport or Public Use Airport 3.6-5
3.6.2.6 Proposed Project Site Located in the Vicinity of a Private Airstrip 3.6-5
3.6.2.7 Emergency Response Plan or Emergency Evacuation Plan 3.6-6
3.6.2.8 Wildland Fires 3.6-6
3.6.3 Significance Thresholds 3.6-6
3.6.4 Impact Analysis 3.6-7
3.6.4.1 Routine Transport, Use, or Disposal of Hazardous Materials 3.6-7
3.6.4.2 Release of Hazardous Materials into the Environment .. 3.6-8
3.6.4.3 Existing or Proposed Schools 3.6-9
3.6.4.4 Hazardous Waste Sites 3.6-10
3.6.4.5 Proposed Project Located near Airport 3.6-11
3.6.4.6 Proposed Project Located near Private Airstrip 3.6-11

3.6.4.7 Emergency Response Plan or Emergency Evacuation Plan 3.6-12
3.6.4.8 Wildland Fires 3.6-13
3.6.4.9 Cumulative Impacts 3.6-13
3.6.5 Mitigation Measures 3.6-14
3.6.6 Level of Significance after Mitigation 3.6-17

3.7 Hydrology and Water 3.7-1
3.7.1 Regulatory Framework 3.7-1
3.7.2 Existing Conditions 3.7-6
3.7.2.1 Drainage 3.7-7
3.7.2.2 Surface Water Quality 3.7-7
3.7.2.3 Groundwater 3.7-7
3.7.2.4 Floodways and 100-Year Flood Zone 3.7-7
3.7.2.5 Seiche, Tsunamis, and Mudflows 3.7-8
3.7.3 Significance Thresholds 3.7-8
3.7.4 Impact Analysis 3.7-9
3.7.4.1 Water Quality Standards 3.7-9
3.7.4.2 Surface Water Quality 3.7-10
3.7.4.3 Groundwater 3.7-12
3.7.4.4 Drainage 3.7-13
3.7.4.5 100-Year Flood Zone 3.7-15
3.7.4.6 Seiche, Tsunamis, and Mudflows 3.7-16
3.7.4.7 Cumulative Impacts 3.7-16
3.7.5 Mitigation Measures 3.7-17
3.7.6 Level of Significance after Mitigation 3.7-19

3.8 Noise 3.8-1
3.8.1 Regulatory Framework 3.8-3
3.8.2 Existing Conditions 3.8-7
3.8.2.1 Ambient Noise Levels 3.8-7
3.8.2.2 Noise Receptors 3.8-7
3.8.2.3 Airports and Airport Land Use Plans 3.8-8
3.8.3 Significance Thresholds 3.8-8
3.8.4 Impact Analysis 3.8-9
3.8.4.1 Exposure of Persons to or Generation of Noise Levels in Excess of Standards 3.8-9
3.8.4.2 Construction Noise 3.8-10
3.8.4.3 Operation Noise 3.8-12
3.8.4.4 Cumulative Impacts 3.8-17
3.8.5 Mitigation Measures 3.8-19
3.8.6 Level of Significance after Mitigation 3.8-21

3.9 Population and Housing 3.9-1
3.9.1 Regulatory Framework 3.9-1
3.9.2 Existing Conditions 3.9-6
3.9.3 Significance Thresholds 3.9-12
3.9.4 Impact Analysis 3.9-12
3.9.5 Mitigation Measures 3.9-19

3.10 Public Services 3.10-1
3.10.1 Regulatory Framework 3.10-1
3.10.2 Existing Conditions 3.10-3
3.10.2.1 Fire Protection 3.10-3
3.10.2.2 Police Protection 3.10-4
3.10.2.3 Schools 3.10-5
3.10.2.4 Parks 3.10-6
3.10.2.5 Other Public Services 3.10-7
3.10.3 Significance Thresholds 3.10-7
3.10.4 Impact Analysis 3.10-7
3.10.4.1 Fire Protection 3.10-7
3.10.4.2 Police Protection 3.10-9
3.10.4.3 Schools 3.10-10
3.10.4.4 Parks 3.10-10
3.10.4.5 Other Public Services 3.10-11
3.10.4.6 Cumulative Impacts 3.10-12
3.10.5 Mitigation Measures 3.10-13

3.11 Recreation 3.11-1
3.11.1 Regulatory Framework 3.11-1
3.11.2 Existing Conditions 3.11-3
3.11.3 Significance Thresholds 3.11-6
3.11.4 Impact Analysis 3.11-6
3.11.5 Mitigation Measures 3.11-10

3.12 Traffic and Transportation 3.12-1
3.12.1 Regulatory Framework 3.12-1
3.12.2 Existing Conditions 3.12-3
3.12.3 Significance Thresholds 3.12-16
3.12.4 Impact Analysis 3.12-18
3.12.5 Mitigation Measures 3.12-39
3.12.6 Level of Significance after Mitigation 3.12-43

3.13 Utilities and Service Systems 3.13-1
3.13.1 Regulatory Framework 3.13-1
3.13.2 Existing Conditions 3.13-4
3.13.3 Significance Thresholds 3.13-13
3.13.4 Impact Analysis 3.13-14
3.13.5 Mitigation Measures 3.13-23
3.13.6 Level of Significance after Mitigation 3.13-24

4.0 ALTERNATIVES TO THE PROPOSED PROJECT 4-1

4.1 No Project Alternative 4-7
4.1.1 Alternative Components 4-7
4.1.2 Objectives and Feasibility 4-7
4.1.3 Construction Scenario 4-8
4.1.4 Comparative Impacts 4-8
4.2 Alternative 1: Reduced Project Size Alternative (900,000 Square Foot Tier II) 4-18

4.2.1 Alternative Components 4-18
4.2.2 Objectives and Feasibility 4-19
4.2.3 Construction Scenario 4-19
4.2.4 Comparative Impacts 4-19
4.3 Alternative 2: Re-Opening the Existing MACC Alternative 4-29
4.3.1 Alternative Components 4-29
4.3.2 Objectives and Feasibility 4-29
4.3.3 Construction Scenario 4-29
4.3.4 Comparative Impacts 4-30
4.4 Alternative 3: Transportation Focused Alternative 4-39
4.4.1 Alternative Components 4-39
4.4.2 Objectives and Feasibility 4-40
4.4.3 Construction Scenario 4-40
4.4.4 Comparative Impacts 4-40
4.5 Alternative 4: 500 Beds (In Tier I) Alternative 4-49
4.5.1 Alternative Components 4-49
4.5.2 Objectives and Feasibility 4-50
4.5.3 Construction Scenario 4-50
4.5.4 Comparative Impacts 4-50
4.6 Alternative 5: No Tier II Alternative 4-60
4.6.1 Alternative Components 4-60
4.6.2 Objectives and Feasibility 4-60
4.6.3 Construction Scenario 4-60
4.6.4 Comparative Impacts 4-61

5.0 UNAVOIDABLE IMPACTS 5-1

6.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES RELATED TO IMPLEMENTATION OF THE PROPOSED PROJECT 6-1

7.0 GROWTH-INDUCING IMPACTS 7-1

8.0 MANDATORY FINDINGS OF SIGNIFICANCE 8-1

9.0 ORGANIZATIONS AND PERSONS CONSULTED 9-1

10.0 REPORT PREPARATION PERSONNEL 10-1

10.1 County of Los Angeles 10-1
10.1.1 Chief Executive Office 10-1
10.1.2 Department of Public Works 10-1
10.1.3 County Subconsultants 10-1
10.2 Sapphos Environmental, Inc. 10-2
10.2.1 Sapphos Environmental, Inc. Subconsultants 10-4

11.0 REFERENCES 11-1

12.0 DISTRIBUTION LIST 12-1

12.1 Public Agencies 12-2

12.1.1 Federal 12-2
12.1.2 State 12-2
12.1.3 Regional 12-4
12.1.4 County of Los Angeles 12-6
12.1.5 Other Local Agencies 12-6
12.2 Interested Parties 12-10

FIGURES ***FOLLOWS PAGE***

2.1-1 Project Location Map 2-1
2.1-2 Regional Vicinity Map 2-1
2.1-3 Local Vicinity Map 2-1
2.1-4 Topographic Map 2-1
2.2.1-1 MLK Timeline of Planning and Environmental Review Process 2-2
2.2.2-1 MLK Existing Campus Plan 2-3
2.2.5-1 General Plan Land Use 2-15
2.2.6-1 Zoning Designations 2-15
2.4-1 MLK Proposed Campus Plan 2-18
2.6-1 Related Project Locations 2-31
3.1.4.4-1 Potential Shade or Shadow Impacts: Worst-Case Scenario 3.1-14
3.1.4.4-2 Possible Placement of Building Causing No Shade or Shadow Impacts 3.1-14
3.3.2.3-1 Martin Luther King, Jr. Medical Center Campus Historic District 3.3-10
3.3.4.3-1 Project Impacts to the Martin Luther King, Jr. Medical Center Campus Historic District 3.2-21
3.8.2.1-1 Measured Ambient Noise Levels in Proposed Project Vicinity 3.8-7
3.8.2.2-1 Noise Receptors 3.8-7

TABLES ***PAGE***

ES.4-1 Summary of Significant Impacts ES-3
1.1.2-1 Initial Study Comment Matrix 1-3
2.2.2-1 Existing Buildings and Structures 2-4
2.4-1 Proposed Campus Development Matrix 2-19
2.4-2 Proposed Tier II Campus Development Calculations 2-21
2.4-3 Proposed Project Development Summary 2-21
2.4.2-1 Proposed Tier II Campus Development Matrix 2-24
2.4.4.1-1 Anticipated Construction Equipment 2-27
2.5-1 Required Approvals 2-31
2.6-1 List of Related Projects 2-32
3.2.1.1-1 Ambient Air Quality Standards 3.2-3
3.2.2.6-1 Summary of 2006–2008 Ambient Air Quality Data in the Project Vicinity 3.2-9
3.2.2.7-1 Sensitive Receptor Locations 3.2-10
3.2.3.1-1 SCAQMD Daily Construction Emission Thresholds of Significance 3.2-12
3.2.3.2-1 SCAQMD Daily Operational Emission Thresholds of Significance 3.2-12
3.2.4.2-1 Tier I – Unmitigated Estimated Daily Regional Construction Emissions 3.2-17
3.2.4.2-2 Tier II – Unmitigated Estimated Daily Regional Construction Emissions 3.2-19
3.2.4.3-1 Estimated Daily Operational Emissions 3.2-21
3.2.6-1 Tier I – Mitigated Estimated Daily Regional Construction Emissions 3.2-29
3.2.6-2 Tier II – Mitigated Estimated Daily Regional Construction Emissions 3.2-30

3.3.2.2-1 Previously Recorded Prehistoric and Historic Archaeological Sites located within 1.0 mile of Martin Luther King, Jr. Medical Center Campus 3.3-10
3.3.2.3-1 Historic Resources Survey Results 3.3-11
3.3.4.3-1 Project Impacts to Historical Resources 3.3-22
3.5.1-1 California Greenhouse Gas Business-as-Usual Emissions and Targets 3.5-7
3.5.1-2 Characterization of Business-as-Usual and Target GHG Emissions for the County . 3.5-13
3.5.2-1 Estimated Existing Daily Operational Emissions 3.5-14
3.5.3-1 CAPCOA-Suggested Thresholds for Greenhouse Gases 3.5-15
3.5.4.1-1 Tier I: Unmitigated Estimated Daily Regional Construction Emissions 3.5-20
3.5.4.1-2 Tier II: Unmitigated Estimated Daily Regional Construction Emissions 3.5-21
3.5.4.1-3 Estimated Daily Increase in Operational Emissions Due to the Proposed Project Estimated Daily Operational Emissions 3.5-22
3.8-1 A-weighted Sound Levels 3.8-2
3.8.1-2 County of Los Angeles Exterior Noise Standards 3.8-4
3.8.1-3 Maximum Construction Noise Levels 3.8-6
3.8.2.1-1 Measured Ambient Noise Levels in the Vicinity of the Proposed Project 3.8-7
3.8.2.2-1 Noise-Sensitive Receptor Points in the Vicinity of the Proposed Project Site 3.8-8
3.8.3-1 Ambient Noise Significance Thresholds 3.8-9
3.8.4.2-1 Construction Activity Noise Levels at 50 Feet 3.8-10
3.8.4.2-2 Predicted Distance at which Construction Noise Impacts would be Below the Level of Significance 3.8-11
3.8.4.3-1 Vibration Velocities for Construction Equipment 3.8-15
3.8.4.3-2 Construction-Related Vibration Levels at the Nearest Sensitive Receptor, Structural Damage 3.8-15
3.8.4.3-3 Construction-Related Vibration Levels at the Nearest Sensitive Receptor, Human Perception 3.8-16
3.8.6-1 Distance at which Mitigated Construction Noise Impacts would be Below the Level of Significance 3.8-21
3.9.2-1 Population Trends by County, Region, and Community 3.9-7
3.9-2-2 SCAG RHNA Anticipated Housing Need by Income Bracket for Unincorporated Los Angeles County 3.9-8
3.9.2-3 SCAG RHNA Household Need Allocations by Income Bracket for Unincorporated Los Angeles County 3.9-9
3.9.2-4 Housing Trends and Population for Los Angeles County 3.9-9
3.9.2-5 Employment Trends in the Professional Business Services and Education and Health Services Sectors for the Gateway Cities Subregion (2000 and 2005) 3.9-11
3.9.2-6 Population, Households, and Jobs Projections for the Gateway Cities Subregion (2008 to 2035) 3.9-12
3.10.2.1-1 Existing Fire Stations Serving the Proposed Project Site 3.10-3
3.10.2.2-1 Crime and Arrest Reported Incident Statistics in the Proposed Project Area 3.10-4
3.11.2-1 Future Park Expansion and Improvements Project 3.11-5
3.12.2-1 Level of Service Definition for Signalized Intersections 3.12-7
3.12.2-2 Summary of Intersection Evaluated: Existing Conditions 3.12-8
3.12.4-1 Tier I Summary of Intersection LOS: Existing Baseline with Ambient Growth (2014) Traffic Conditions 3.12-21
3.12.4-2 Tier I: Non-County Operated Jurisdictions Impacts 3.12-24
3.12.4-3 Estimated Project Trip Generation: Tier I and Tier II 3.12-27
3.12.4-4 Proposed Project and Ambient Growth 3.12-28
3.12.4-5 Future 2020 with Project 3.12-30

3.12.4-6 Cumulative LOS Summary with Ambient Growth, Related Projects, Tier I, and Tier II 3.12-37
3.12.6-1 Traffic Impact Analysis – Future 2020 Cumulative Conditions Los Angeles County Locations 3.12-44
3.13.2-1 Central Basin's Current and Project Water Demand (AF) 3.13-6
3.13.2-2 Population Projections for Central Basin's Service Area 2005 to 2030 ..... 3.13-7
3.13.2-3 Projected Per Capita Retail Water Usage 2010-2030 ..... 3.13-7
3.13.2-4 CBMWD's Stages of Action for a Water Shortage 3.13-8
3.13.2-5 Projected Future Uses of Recycled Water (AF) 3.13-8
3-13.2-6 PWC's Central Basin Division Population Projections 3.13-9
3.13.2-7 PWC's Current and Projected Water Supply (AF) 3.13-10
3.13.2-8 Operational Water Use at the Proposed Project Site, 2002-2006 ..... 3.13-10
3.13.2-9 Solid Waste Facilities in the Los Angeles Area 3.13-11
3.13.4-1 Tier II Projected Water Demand by Use Type 3.13-17
4-1 Summary of Proposed Project and Alternatives' Ability to Attain Project Objectives 4-2
4-2 Tier I Summary of Proposed Project and Alternatives' Environmental Impacts 4-6
4-3 Tier II Summary of Proposed Project and Alternatives' Environmental Impacts 4-7
4.1.4-1 Alternatives Analysis – Summary and Comparison of Net Trip Generation Estimates 4-17
5-1 Summary of Tier I Environmental Impacts Identified in the EIR 5-2
5-2 Summary of Tier II Environmental Impacts Identified in the EIR 5-3

VOLUME II

TECHNICAL APPENDICES

Appendix A Initial Study, Scoping Meeting Comments, and Comment Letters
Appendix B Aesthetics Analysis Technical Report
Appendix C Air Quality and Greenhouse Gas Emissions Technical Impact Report
Appendix D Biological Resources Technical Report
Appendix E Cultural Resources Technical Report
Appendix F Noise Technical Report
Appendix G Stormwater Analysis for Tier I Development
Appendix H Traffic Study for the Martin Luther King Jr. Medical Campus Center Project
Appendix I Water Supply Assessment

SECTION ES
EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) analyzes the potential for significant environmental impacts in association with the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project). The proposed project would occur within the community of Willowbrook, County of Los Angeles, California.

The proposed project consists of project- and program-level improvements to the proposed project campus.

ES.1 EXISTING FACILITIES

The proposed project site consists of 15 buildings: Genesis Clinic, Oasis Clinic (old), Oasis Clinic (new), Registration Building, Augustus F. Hawkins Comprehensive Mental Health Center, Inpatient Tower, Multi-Service Ambulatory Care Center (MACC), Pediatric Acute Care Building, Medical Records and Laundry Building, Central Plant, Plant Management Building, North Support Building, South Support Building, Interns and Physicians Building, and Hub Clinic. There is also a multi-level parking structure available for parking and six support and ancillary buildings and facilities including: an Emergency Room, Magnetic Resonance Imaging (MRI) Building, Claude Hudson Auditorium, Cooling Towers, and two storage buildings on the proposed project site. The developed floor area (not including the parking structure) is approximately 1.2 million square feet.

ES.2 PROPOSED PROJECT

The proposed project consists of two distinct tiers: Tier I, project-level development, and Tier II, program-level development.

ES.2.1 Tier I

Tier I of the proposed project would entail vacation of the emergency room, storage buildings, cooling towers, and existing MACC, and the development of two new environmentally sustainable buildings: the 132,000-square-foot new MACC and the 24,700-square-foot Ancillary Building. Tier I development would consist of approximately 170,332 square feet of new development and the vacation of approximately 509,018 square feet. In addition, tenant improvements in existing buildings, site improvements, and potential relocation of the MRI Building would occur in Tier I.

ES.2.2 Tier II

Tier II of the proposed project would entail the development of a campus-wide Master Plan. It is anticipated that the development described in the Master Plan would seek to prepare the proposed project site for future mixed-use campus-related development that would provide the health services necessary to respond to and address the needs of the community. Tier II would have the potential to build out approximately 1,814,696 square feet of development on the proposed project site with mixed uses including medical office, commercial, retail, office space, recreation, and other development in support of the campus. The net new development of the proposed project would be approximately 1,476,010 square feet. Tier II would also entail the construction of up to 100 residential units, to be developed at a multi-family density consistent with surrounding residential area multi-family development densities. In addition, the Tier II components would

entail the reuse or replacement of the existing MACC building, emergency room, storage building, and cooling towers.

ES.3 ISSUES TO BE RESOLVED

The Initial Study analysis (Appendix A) undertaken in support of this EIR determined that there are several environmental issue areas related to the California Environmental Quality Act (CEQA) that are not expected to have significant impacts resulting from implementation of the proposed project. These issue areas are agriculture and forest resources, biological resources, land use and planning, and mineral resources. These issue areas, therefore, were not carried forward for detailed analysis in the EIR. The environmental issues identified in the Initial Study that were resolved in this EIR are aesthetics, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards, hydrology and water quality, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems.

ES.4 SUMMARY OF IMPACTS

Tier I

The analysis undertaken in support of Tier I of this EIR has determined that population and housing, public services, recreation, and utilities and service systems would result in less than significant or no impacts during Tier I of the proposed project. Impacts related to aesthetics (light and glare), air quality (air quality standards, cumulative impacts, and sensitive receptors during construction only), cultural resources (paleontological resource and human remains), geology and soils (soil erosion or loss of top soil, geologic unit or unstable soil, and expansive soil), greenhouse gas emissions (operation), hazards and hazardous materials (accidental release, within 0.25 mile of an existing or proposed school, and Government Code Section 65962.5), hydrology and water quality (water quality standards, waste discharge, runoff water, and water quality during construction and limited operation), noise (mechanical noise during construction only), and transportation and traffic (circulation system and congestion during construction only) can be mitigated to below the level of significance. Construction-related impacts to greenhouse gases (construction) and noise (construction) may remain significant following the implementation of mitigation measures. Table ES.4-1, *Summary of Significant Impacts*, presents potentially significant impacts related to each issue area analyzed that might result, or can be reasonably expected to result, from implementation of the proposed project. Table ES.4-1 also presents the significant impacts, mitigation measures, and the level of significance after mitigation for each issue area analyzed in the EIR.

Tier II

The analysis undertaken in support of Tier II of this EIR has determined that population and housing, public services, and recreation would result in less than significant or no impacts during Tier II of the proposed project. Impacts related to aesthetics (light and glare, shade and shadow, and visual character), cultural resources (paleontological resource and human remains), geology and soils (soil erosion or loss of top soil, geologic unit or unstable soil, and expansive soil), hazards and hazardous materials (accidental release, within 0.25 mile of an existing or proposed school, and Government Code Section 65962.5), hydrology and water quality (water quality standards, waste discharge, runoff water, and degrade water quality during construction and operation), noise (mechanical noise), transportation and traffic (circulation system and congestion during construction, operation, and cumulative impacts), utilities and service systems (wastewater

treatment requirements and solid waste compliance) can be mitigated to below the level of significance. Impacts to air quality (air quality standards, cumulative impacts, sensitive receptors during construction and limited operation), cultural resources (historical resource), greenhouse gas emissions (construction), and noise (construction and vibration) may remain significant following the implementation of mitigation measures. Table ES.4-1 presents potentially significant impacts related to each issue area analyzed that might result, or can be reasonably expected to result, from implementation of the proposed project. Table ES.4-1 also presents the significant impacts, mitigation measures, and the level of significance after mitigation for each issue area analyzed in the EIR.

The Tier II components are conceptual at this time, and therefore will only be discussed in a programmatic level in the EIR, as permitted under CEQA. Once the detailed future development plans for Tier II components are prepared, consistent with the guidelines for programmatic EIRs under CEQA, the projects will be examined in light of the program EIR analysis, to assess project level impacts and to determine whether additional environmental document(s) must be prepared.

Unless it is noted otherwise, the County is responsible for ensuring compliance with all mitigation measures for Tier I and Tier II of the proposed project.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS

Impact	Mitigation Measure	Level of Significance After Mitigation
Aesthetics		
Implementation of Tier I of the proposed project would be expected to result in significant impacts to aesthetics in relation to light and glare.	**Tier I** ***Measure Aesthetics-1*** All exterior lighting proposed for building and on-site security lighting shall be shielded and directed downwards to minimize the impacts on the surrounding land uses. No large expanses of reflective or otherwise glare-producing surfaces (such as windows or walls) would be included within the building components or materials.	The recommended mitigation measure Aesthetics-1 would be able to reduce project impacts related to light and glare to less than significant.
Implementation of Tier II of the proposed project would be expected to result in significant impacts to aesthetics in relation to visual character, shade and shadow, and light and glare.	**Tier II** ***Measure Aesthetics-1*** All exterior lighting for building and on-site security lighting shall be shielded and directed downwards to minimize the impacts on the surrounding land uses. No large expanses of reflective or otherwise glare-producing surfaces (such as windows or walls) would be included within the building components or materials. ***Measure Aesthetics-2*** The County of Los Angeles shall review all plans for the proposed Tier II development and ensure that all contractors conform with all design features as described in the intended to incorporate materials to ensure visual consistency and continuity at the proposed project site and within the surrounding area. ***Measure Aesthetics-3*** All development shall be limited to three stories in height if the proposed structure would be located along the western or eastern edge of the property. The existing setback include the pediatric modular building/ oasis clinic located approximately 14 feet from the property line along the eastern boundary at Wilmington Avenue, Interns and Physicians Building at approximately 20 feet from property line along the western boundary at Compton Avenue, the Hawkin's Building located at approximately 30 feet from property line along the northern boundary at 120th Street, and the Cooling Tower located at 44 feet from the property line along the south. Alternatively, if a structure would exceed three stories in height along the perimeter of the property (western or eastern perimeter only), at a minimum, the building would be required stay within the approximately 20-foot and for 14-foot existing campus respective western and eastern boundary setbacks to reduce shade and shadow impacts to adjacent land uses along Compton Avenue and Wilmington Avenue. ***Measure Aesthetics-4*** Where parking lots or structures are adjacent to residential areas or near other sensitive light receptors along the southern portion of the campus, Compton Avenue, and Wilmington Avenue, retaining walls and/or landscaping of sufficient height shall be incorporated into the design of the proposed project to shield vehicle headlights (which typically sit at a minimum of 3 feet in height above ground). These project features shall be included in the landscape plans and final project design plans (to avoid and reduce potential light and glare obstructions that could impact residential areas).	Implementation of mitigation measure Aesthetics-1 and Aesthetics-4 would be expected to prevent security lighting and building lighting from causing significant levels of light spillover or light trespass. Implementation of mitigation measure Aesthetics-4 would be expected to prevent vehicle highlights from causing significant levels of light intrusion. Finally, implementation of mitigation measure Aesthetics-3 and Aesthetics-4 would be expected to reduce impacts related to a new source of light and glare to below the level of significance. Implementation of mitigation measures Aesthetics-2 and Aesthetics-3 would be expected to prevent potential building shadows from Tier II from causing significant levels of shade to spill over onto adjacent land uses including residences. Therefore, implementation of mitigation measures Aesthetics-2 and Aesthetics-3 would be expected to reduce impacts related to a new source of shadow to below the level of significance for the proposed Tier II project components. Implementation of mitigation measure Aesthetics-2 would be expected to ensure consistency within the medical campus and with the surrounding area. As supported by project design guidelines listed in mitigation measure Aesthetics-1, the materials used to construct Tier II of proposed project would be consistent with existing visual quality conditions at the proposed project site and within the surrounding area, and would reduce potential impacts to visual character to below the level of significance.
Air Quality		
Implementation of Tier I of the proposed project would be expected to result in significant impacts to air quality	**Tier I** ***Measure Air-1*** Water or a stabilizing agent shall be applied during Tier I to exposed surfaces in sufficient quantity to prevent generation of dust plumes. Soil moistening shall be required to treat exposed soil during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. Prior to advertising for	Implementation of air quality mitigation measures Air-1 through Air-8 would reduce fugitive dust emissions associated with construction activities, which would cause daily PM2.5 and PM_{10} emissions to remain at below the SCAQMD thresholds of significance.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
related to air quality standards, cumulative impacts, and sensitive receptors during construction only.	construction bids for each element, the plans and specifications shall be reviewed by the lead agency to ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that soil shall be moistened not more than 15 minutes prior to the daily commencement of soil-moving activities and three times a day, or four times a day under windy conditions (when winds exceed 25 miles per hour), in order to maintain a soil moisture content of 12 percent, as determined by American Society for Testing and Materials method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency. The construction contractor shall demonstrate compliance with this measure through the submission of weekly monitoring reports to the lead agency. At a minimum, active operations shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type that is part of the active operation. ***Measure Air-2*** Moistening or covering of excavated soil piles shall be required during Tier I to treat grading areas during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that excavated soil piles are watered hourly for the duration of construction or covered with temporary coverings. ***Measure Air-3*** Discontinuing Tier I construction activities that occur on unpaved surfaces during windy conditions (when winds exceed 25 miles per hour) shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cease construction activities that occur on unpaved surfaces during periods when winds exceed 25 miles per hour. ***Measure Air-4*** Track-out during Tier I shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday. Track-out is defined by the South Coast Air Quality Management District as any bulk material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that have been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure that the track-out shall not extend 25 feet or more from an active operation and that it would be removed at the conclusion of each workday. ***Measure Air-5*** A wheel washing system shall be installed during Tier I, and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site. Washing of wheels leaving the construction site during construction of each element shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. The lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to clean adjacent streets of tracked dirt at the end of each workday or install on-site wheel-washing facilities. ***Measure Air-6*** All haul trucks hauling soil, sand, and other loose materials during Tier I shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions). All transport of soils to and from the project site for each element shall be conducted in a manner that avoids fugitive dust emissions and ensures compliance with current air quality standards. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cover all loads of dirt leaving the site or to leave sufficient freeboard capacity in the truck to prevent fugitive dust emissions en route to the disposal site.	Implementation of mitigation measure Air-9 would ensure that criteria pollutant emissions associated with the use of construction equipment would be reduced to the maximum extent feasible. As such, criteria pollutant emissions during construction would remain at below the level of significance and would therefore not be significant. Mitigation measures Air-1 through Air-9 would also ensure that cumulative air quality impacts during construction would remain at below the level of significance and that construction-related impacts to sensitive receptors would be reduced to below the level of significance.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	Measure Air-7 Traffic speeds on unpaved roads during Tier I shall be limited to 15 miles per hour. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure a traffic speed limited to 15 miles per hour. ***Measure Air-8*** Heavy-equipment Tier I operations shall be suspended during first- and second-stage smog alerts. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure heavy-equipment operations be suspended during first- and second-stage smog alerts. ***Measure Air-9*** All diesel engines used during Tier I for construction activities for the project that are not registered under California Air Resources Board's Statewide Portable Equipment Registration Program and have a rating of 50 horsepower or more, shall meet, at a minimum, the Tier 2 California Emission Standards for Off-road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, section 2423(b)(1) unless that such engine is not available for a particular item of equipment. In the event a Tier 2 engine is not available for any diesel engine larger than 50 horsepower, that engine shall be equipped with retrofit controls that would provide nitrogen oxide and particulate matter emissions that are equivalent to a Tier 2 engine. All equipment shall be turned off when not in use. Engine idling of all equipment used during both construction and operation/maintenance shall be minimized. All equipment engines shall be maintained in good operating condition and in proposed tune per manufacturers' specification. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure the construction equipment meet the aforementioned criteria. **Tier II**	
Implementation of Tier II of the proposed project would be expected to result in significant impacts to air quality related to air quality standards, cumulative impacts, sensitive receptors during construction, and limited operation.	***Measure Air-1*** Water or a stabilizing agent shall be applied during Tier II to exposed surfaces in sufficient quantity to prevent generation of dust plumes. Soil moistening shall be required to treat exposed soil during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. Prior to advertising for construction bids for each element, the plans and specifications shall be reviewed by the lead agency to ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that soil shall be moistened not more than 15 minutes prior to the daily commencement of soil-moving activities and three times a day, or four times a day under windy conditions (when winds exceed 25 miles per hour), in order to maintain a soil moisture content of 12 percent, as determined by American Society for Testing and Materials method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency. The construction contractor shall demonstrate compliance with this measure through the submission of weekly monitoring reports to the lead agency. At a minimum, active operations shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type that is part of the active operation. ***Measure Air-2*** Moistening or covering of excavated soil piles shall be required during Tier II to treat grading areas during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that excavated soil piles are watered hourly for the duration of construction or covered with temporary coverings.	Implementation of air quality mitigation measures Air-1 through Air-8 would reduce fugitive dust emissions associated with construction activities, which would cause daily PM2.5 and PM_{10} emissions to remain at below the SCAQMD thresholds of significance. Implementation of mitigation measure Air-9 would ensure that criteria pollutants emissions associated with the use of construction equipment would be reduced to the maximum extent feasible. However, VOCs and NO_x emissions during construction would still result in temporary significant and unavoidable impacts. Mitigation measures Air-1 through Air-9 would also ensure that air quality impacts on sensitive receptors during construction would be reduced to the maximum extent feasible. However, implementation of Tier II of the proposed project would still have the potential to result in significant impacts to sensitive receptors related to emissions of NO_x, $PM_{2.5}$, and PM_{10}. Mitigation measures Air-1 through Air-9 would also ensure that cumulative air quality impacts during construction would be reduced to the maximum extent feasible. However, implementation of Tier II of the proposed project would still be expected to result in cumulative construction-related impacts when considered with construction and

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	Measure Air-3 Discontinuing Tier II construction activities that occur on unpaved surfaces during windy conditions (when winds exceed 25 miles per hour) shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cease construction activities that occur on unpaved surfaces during periods when winds exceed 25 miles per hour. ***Measure Air-4*** Track-out during Tier II shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday. Track-out is defined by the South Coast Air Quality Management District as any bulk material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that have been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure that the track-out shall not extend 25 feet or more from an active operation and that it would be removed at the conclusion of each workday. ***Measure Air-5*** A wheel washing system shall be installed during Tier II, and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site. Washing of wheels leaving the construction site during construction of each element shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. The lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to clean adjacent streets of tracked dirt at the end of each workday or install on-site wheel-washing facilities. ***Measure Air-6*** All haul trucks hauling soil, sand, and other loose materials during Tier II shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions). All transport of soils to and from the project site for each element shall be conducted in a manner that avoids fugitive dust emissions and ensures compliance with current air quality standards. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cover all loads of dirt leaving the site or to leave sufficient freeboard capacity in the truck to prevent fugitive dust emissions en route to the disposal site. ***Measure Air-7*** Traffic speeds on unpaved roads during Tier II shall be limited to 15 miles per hour. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure a traffic speed limited to 15 miles per hour. ***Measure Air-8*** Heavy-equipment Tier II operations shall be suspended during first- and second-stage smog alerts. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure heavy-equipment operations be suspended during first- and second-stage smog alerts. ***Measure Air-9*** All diesel engines used during Tier II for construction activities for the project that are not registered under California Air Resources Board's Statewide Portable Equipment Registration Program and have a rating of 50 horsepower or more, shall meet, at a minimum, the Tier 2 California	operation of the related past, present, or reasonably foreseeable, probable future projects. As there are no feasible mitigation measures for operation of Tier II; therefore, criteria pollutant emissions from mobile sources during operation of Tier II would remain at above the level of significance.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	Emission Standards for Off-road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, section 2423(b)(1) unless that such engine is not available for a particular item of equipment. In the event a Tier 2 engine is not available for any diesel engine larger than 50 horsepower, that engine shall be equipped with retrofit controls that would provide nitrogen oxide and particulate matter emissions that are equivalent to a Tier 2 engine. All equipment shall be turned off when not in use. Engine idling of all equipment used during both construction and operation/maintenance shall be minimized. All equipment engines shall be maintained in good operating condition and in proposed tune per manufacturers' specification. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure the construction equipment meet the aforementioned criteria.	
Cultural Resources		
Implementation of Tier I of the proposed project would be expected to result in significant impacts to cultural resources related to paleontological resource and human remains.	**Tier I** <u>Paleontological Resources</u> ***Measure Cultural-1*** The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation of unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located 15 or more feet below the ground surface that would have the potential to contact extant older Quaternary Alluvium. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, the County of Los Angeles shall require and be responsible for salvage and recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology: • Paleontological Resources Sensitivity Training is required for all project personnel prior to the start of ground-disturbing activities. This brief (approximately 15 minute) field training reviews what fossils are, what fossils might potentially be found, and the appropriate procedures to follow if fossils are found. • Prior to any ground-disturbing activities, the County of Los Angeles shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. • A qualified paleontologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain unique paleontological resources. • Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find. • If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing. • Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data. • All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written	Implementation of mitigation measure Cultural-1 would reduce any potential significant impacts to cultural resources related to an adverse change in the significance of a unique paleontological resource discovered under Tier I to below the level of significance. Implementation of mitigation measure Cultural-2 would reduce any potential significant impacts to human remains discovered under Tier I to below the level of significance.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed. • Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the County of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the County of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources. Human Remains ***Measure Cultural-2*** Although the discovery of human remains is not anticipated during ground-disturbing activities for the proposed project, a process has been delineated for addressing the unanticipated discovery of human remains: • Unanticipated Discovery of Human Remains (Public Resources Code 5097). The Los Angeles County Coroner shall be notified within 24 hours of the discovery of human remains. Upon discovery of human remains, there shall be no further excavation or disturbance of the site or any of that area reasonably suspected to overlie adjacent human remains until the following conditions are met: • The Los Angeles County Coroner has determined that no investigation of the cause of death is required, and • Whenever the Native American Heritage Commission receives notification of a discovery of Native American human remains from the Los Angeles County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. If the remains are of Native American origin, the descendants from the deceased Native Americans shall complete their inspection and make recommendations or preferences in writing to the landowner or the person responsible for the excavation work, for treatment or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.	
	Tier II	
Implementation of Tier II of the proposed project would be expected to result in significant impacts to cultural resources related to paleontological resource, human remains, and historical resource.	Paleontological Resources ***Measure Cultural-1*** The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation of unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located 15 or more feet below the ground surface that would have the potential to contact extant older Quaternary Alluvium. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, the County of Los Angeles shall require and be responsible for salvage and recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology: • Paleontological Resources Sensitivity Training is required for all project personnel prior to the start of ground-disturbing activities. This brief (approximately 15 minute) field training reviews what fossils are, what fossils might potentially be found, and the appropriate procedures to follow if fossils are found. • Prior to any ground-disturbing activities, the County of Los Angeles shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.	Implementation of mitigation measure Cultural-1 would reduce any potential significant impacts to cultural resources related to an adverse change in the significance of a unique paleontological resource discovered under Tier II to below the level of significance. Implementation of mitigation measure Cultural-2 would reduce any potential significant impacts to human remains discovered under Tier II to below the level of significance. Implementation of mitigation measure Cultural-3 would reduce Tier II impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium as a result of Tier II of the proposed project to below the level of significance. Implementation of mitigation measures Cultural-4 and Cultural-5 would reduce Tier II impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium as a result of Tier II of the proposed project

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	• A qualified paleontologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain unique paleontological resources. • Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find. • If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing. • Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data. • All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed. • Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the County of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the County of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources. <u>Human Remains</u> ***Measure Cultural-2*** Although the discovery of human remains is not anticipated during ground-disturbing activities for the proposed project, a process has been delineated for addressing the unanticipated discovery of human remains: • Unanticipated Discovery of Human Remains (Public Resources Code 5097). The Los Angeles County Coroner shall be notified within 24 hours of the discovery of human remains. Upon discovery of human remains, there shall be no further excavation or disturbance of the site or any of that area reasonably suspected to overlie adjacent human remains until the following conditions are met: • The Los Angeles County Coroner has determined that no investigation of the cause of death is required, and • Whenever the Native American Heritage Commission receives notification of a discovery of Native American human remains from the Los Angeles County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. If the remains are of Native American origin, the descendants from the deceased Native Americans shall complete their inspection and make recommendations or preferences in writing to the landowner or the person responsible for the excavation work, for treatment or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. <u>Historical Resources</u> Potentially significant adverse impacts to historical resources have been identified in relation to five historical resources as a result of implementation of the Tier II project:, the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins	to the maximum extent feasible. However, the demolition of a historical resource still would remain a significant adverse impact.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium. Three mitigation measures have been identified in association with Tier II to reduce impacts to the maximum extent practicable. In the event that the five historical resources are not removed or otherwise impacted through significant modifications or alterations to the character-defining features of these resources, this impact would be less than significant and would not require mitigation. ***Measure Cultural-3*** Tier II impacts to four significant historical resources (Multi-Service Ambulatory Care Center [MACC], Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium) and the integrity of the Martin Luther King, Jr. Medical Center Campus Historic District (a fifth historic resource) shall be reduced to below the level of significance through utilization of the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines of Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* for any proposed alterations, including all site work, structural upgrades, architectural, and mechanical systems improvements and repairs. The work shall conform to the standards and guidelines for "rehabilitation." Conformance with the Secretary of the Interior's Standards shall be monitored by an architectural historian or historic architect who meets the Secretary of the Interior's Professional Qualification Standards. Completion of this mitigation measure shall be monitored and enforced by the County of Los Angeles. ***Measure Cultural-4*** Tier II impacts resulting from demolition or substantial alteration of significant historical resources not in conformance with the Secretary of the Interior's Standards shall be reduced to the maximum extent feasible through archival documentation of as-found condition. Prior to the initiation of construction activities, the County of Los Angeles shall ensure that documentation of the Martin Luther King, Jr. Medical Center Campus Historic District, Multi-Service Ambulatory Care Center (MACC), Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and/or Dr. H. Claude Hudson Auditorium is completed in accordance with Historic American Buildings Survey (HABS) requirements for donated material. The documentation shall be in the form of a Historic American Building Survey and shall comply with the *Secretary of the Interior's Standards for Architectural and Engineering Documentation*. The documentation shall include large-format photographic recordation, detailed historic narrative report, measured architectural drawings, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The original archival-quality documentation shall be offered as donated material to Historic American Building Survey for inclusion in the Library of Congress. Archival copies of the documentation also would be available at the Martin Luther King, Jr. Medical Center campus and maintained by the County of Los Angeles. ***Measure Cultural-5*** Impacts resulting from the loss of integrity of the Martin Luther King, Jr. Medical Center Campus Historic District such that its significance is materially impaired will be reduced to the maximum extent feasible through the development of a retrospective exhibit detailing the history of the Martin Luther King, Jr. Medical Center Campus Historic District, its significance, and its important details and features. The retrospective exhibit shall be in the form of a physical exhibit installed on the Martin Luther King, Jr. Medical Center Campus, which is located either within a building or on a freestanding kiosk or comparable structure or installation on the property. The exhibit should commemorate the historic appearance of the district and provide the public with sufficient information to understand its historic significance. The exhibit shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The exhibit should be completed within a period of no more than two years from the date of completion of Tier II of the proposed project.	

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
Geology and Soils		
Implementation of Tier I of the proposed project would be expected to result in significant impacts to geology and soils in relation to substantial soil erosion and loss of topsoil, being located on a geologic unit or soil that is unstable, or that would become unstable, and being located on expansive soil, creating substantial risks to life or property.	**Tier I** ***Measure Geology-1*** The construction contractor shall incorporate best management practices consistent with the guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction*.[1] As discussed in the Geotechnical Investigation that was prepared for the project site, earthwork at the project site should be performed in conformance with the Los Angeles County Building Code and other guidelines provided in the geotechnical study, and under the observation and testing of a geotechnical engineer, in order to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. ***Measure Geology-2*** Due to seismic compliance standards established by the Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or as required, the construction contractor shall incorporate project design elements consistent with Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or required standards, and thus further reduce any potential for impacts resulting from unstable geologic units and soils. The County of Los Angeles shall conform to measures described in the project geotechnical study(ies) to ensure compliance throughout the construction and development of the project. ***Measure Geology-3*** A geotechnical engineer shall be present on site for observation of earth-moving activities (such as site preparation, excavation) to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. Any unanticipated adverse conditions encountered shall be evaluated by the project engineering geologist and the soil engineer.	Implementation of mitigation measure Geology-1 would reduce significant impacts of Tier I related to soil erosion or loss of topsoil to below the level of significance. Implementation of mitigation measure Geology-2 would reduce significant impacts of Tier I related to the proposed project being located on a geologic unit or soil that is unstable to below the level of significance. Implementation of mitigation measure Geology-3 would reduce significant impacts of Tier I related to the proposed project being located on expansive soil to below the level of significance.
Implementation of Tier II of the proposed project would be expected to result in significant impacts to geology and soils in relation to substantial soil erosion and loss of topsoil, being located on a geologic unit or soil that is unstable, or that would become unstable, and being located on expansive soil, creating substantial risks to life or property.	**Tier II** ***Measure Geology-1*** The construction contractor shall incorporate best management practices consistent with the guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction*.[2] As discussed in the Geotechnical Investigation that was prepared for the project site, earthwork at the project site should be performed in conformance with the Los Angeles County Building Code and other guidelines provided in the geotechnical study, and under the observation and testing of a geotechnical engineer, in order to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. ***Measure Geology-2*** Due to seismic compliance standards established by the Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code,, or as required, the construction contractor shall incorporate project design elements consistent with Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or required standards, and thus further reduce any potential for impacts resulting from unstable geologic units and soils. The County of Los Angeles shall conform to measures described in the project geotechnical study(ies) to ensure compliance throughout the construction and development of the project.	Implementation of mitigation measure Geology-1 would reduce significant impacts of Tier II related to soil erosion or loss of topsoil to below the level of significance. Implementation of mitigation measure Geology-2 would reduce significant impacts of Tier II related to the proposed project being located on a geologic unit or soil that is unstable to below the level of significance. Implementation of mitigation measure Geology-3 would reduce significant impacts of Tier II related to the proposed project being located on expansive soil to below the level of significance.

[1] California Stormwater Quality Association. 2003. *California Stormwater Best Management Practice Handbooks: Construction*. Menlo Park, CA. Available at: http://www.cabmphandbooks.com/Documents/Construction/Section_3.pdf

[2] California Stormwater Quality Association. 2003. *California Stormwater Best Management Practice Handbooks: Construction*. Menlo Park, CA. Available at: http://www.cabmphandbooks.com/Documents/Construction/Section_3.pdf

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	Measure Geology-3 A geotechnical engineer shall be present on site for observation of earth moving activities (such as site preparation, excavation) to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. Any unanticipated adverse conditions encountered shall be evaluated by the project engineering geologist and the soil engineer.	
Greenhouse Gas Emissions		
Implementation of the proposed project would be expected to result in significant impacts to greenhouse gas emissions related to emissions during construction and operation.	**Tier I** ***Measure GHG-1*** Prior to construction of the proposed project, the final design plan and schemes for Tier I shall be reviewed to ensure that the County of Los Angeles conforms to its commitments pursuant to the California Climate Action Registry and the greenhouse gas emissions reduction targets established in Assembly Bill 32 are dependent on the incorporation of this mitigation measure, which is based on seven (7) of the sustainable design strategies or comparable measures recommended by the California Office of Attorney General to reduce carbon dioxide (CO_2) emissions per capita: • Design buildings to be energy efficient. Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use • Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings • Create water-efficient landscapes • Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on site can drastically reduce the need for energy-intensive imported water at the site.) • Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods • Incorporate provisions for future public transit into project design • Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio The review shall further ensure that all applicable sustainable design measures or comparable measures have been incorporated into the final project design.	Mitigation measure GHG-1 would reduce CO_2 emissions contributed by operation of Tier I of the proposed project, thereby assisting compliance with the goals of AB 32 to reduce CO_{2e} emissions to 1990 levels by the year 2020. Mitigation measure GHG-1 would ensure that indirect and cumulative GHG emission impacts would be reduced to the maximum extent feasible. After implementation of mitigation measure GHG-1, potential GHG emission impacts associated with operation of Tier I would remain at below the level of significance. However, cconstruction of Tier I of the proposed project may be expected to remain above the level of significance if CAPCOA's suggested quantitative threshold of 900 tons of CO_{2e} per year is used.
Implementation of the proposed project would be expected to result in significant impacts to greenhouse gas emissions related to emissions during construction and operation.	**Tier II** ***Measure GHG-1*** Prior to construction of the proposed project, the final design plan and schemes for Tier II shall be reviewed to ensure that the County of Los Angeles conforms to its commitments pursuant to the California Climate Action Registry and the greenhouse gas emissions reduction targets established in Assembly Bill 32 are dependent on the incorporation of this mitigation measure, which is based on seven (7) of the sustainable design strategies or comparable measures recommended by the California Office of Attorney General to reduce carbon dioxide (CO_2) emissions per capita: • Design buildings to be energy efficient. Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use	Mitigation measure GHG-1 would reduce CO_2 emissions contributed by operation of Tier II of the proposed project, thereby assisting compliance with the goals of AB 32 to reduce CO_{2e} emissions to 1990 levels by the year 2020. Mitigation measure GHG-1 would ensure that indirect and cumulative GHG emission impacts would be reduced to the maximum extent feasible. However, potential GHG emission impacts associated with construction and operation of Tier II would remain as significant and unavoidable.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	• Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings • Create water-efficient landscapes • Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on site can drastically reduce the need for energy-intensive imported water at the site.) • Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods • Incorporate provisions for future public transit into project design • Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio The review shall further ensure that all applicable sustainable design measures or comparable measures have been incorporated into the final project design.	
Hazards and Hazardous Materials		
Implementation of Tier I of the proposed project would be expected to result in significant impacts to hazards and hazardous materials in relation to the release of hazardous materials into the environment and hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste, to existing or proposed schools located within one-quarter mile of the project site, and Government Code Section 65962.5.	**Tier I** ***Measure Hazards-1*** To reduce surface water quality impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. A Spill Prevention Control and Countermeasures Plan shall be developed as a part of these requirements to address the handling of petroleum or other hazardous materials during refueling, operations and maintenance and other construction-related activities. The agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law. ***Measure Hazards-2*** To avoid exposure to asbestos-containing materials and lead-based paints during demolition, construction, and remediation activities, the County of Los Angeles and the Office of Statewide Health Planning and Development shall require that all such materials and wastes be identified and an Operations and Maintenance Plan developed prior to the issuance of demolition permits for each structure constructed prior to 1979. The Operations and Maintenance Plan shall ensure compliance with all applicable federal, state, and local requirements and specify all work to be done, including lead and asbestos surveys of structures to be demolished, proper handling and storage of lubricants and fuels for construction equipment, and methods for remediation of asbestos-containing materials and lead-based paints, if necessary. The Operations and Maintenance Plan shall be submitted to the County of Los Angeles Department of Health Services for review and approval prior to initiation of construction and demolition activities for the MACC building, emergency room, storage building, and cooling towers. The Operations and Maintenance Plan shall, as appropriate and necessary, conform to the requirements of the Los Angeles County Department of Health Services (Local Enforcement Agency), South Coast Air Quality Management District, the Los Angeles Regional Water Quality Control Board, and the Department of Toxic Substances Control. Compliance with the Operations and Maintenance Plan shall be monitored by the County of Los Angeles Regional Planning Department throughout construction and demolition. To reduce impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. These agencies shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.	Implementation of mitigation measure Hazards-1 and Hazards-2 for Tier I would reduce significant impacts related to the exposure of hazards and hazardous materials to below the level of significance. Implementation of mitigation measure Hazards-3 for Tier I would reduce significant impacts related to USTs below the level of significance. Implementation of mitigation measure Hazards-4 for Tier I would reduce significant impacts related to exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon–contaminated soils during routine transport and disposal for both the construction phase and operational phase of the proposed project to below the level of significance. Implementation of mitigation measure Hazards-5 for Tier I would reduce significant impacts related to hazards and hazardous materials below the level of significance.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	Measure Hazards-3 Prior to the issuance of grading permits for development, the County of Los Angeles shall ensure that a Soil Management Plan is prepared for the project site and that the Office of Statewide Health Planning and Development reviews the grading plans to ensure that the construction contractor is required to stop work and notify the Certified Unified Program Agency of the unanticipated encounter of underground storage tanks during grading activities. In the event that any leaking underground storage tanks are located or encountered, the County of Los Angeles Department of Public Works shall be notified and the underground storage tank shall be remediated in accordance with County of Los Angeles guidelines and consistent with specifications of the Department of Toxic Substances Control and other relevant standards. The County of Los Angeles Fire Department Health Hazardous Materials Division shall be notified of all other contaminated soils encountered during construction-related site activities. ***Measure Hazards-4*** To avoid exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon–contaminated soils during routine transport and disposal for both the construction phase and operational phase of the project, the County of Los Angeles shall require that the construction contractor store, use, and transport all hazardous materials in compliance with all relevant regulations and guidelines. The routine transport of hazardous materials to and from the Martin Luther King, Jr. Medical Center Campus during construction and operation of the elements of the project shall be accomplished via Wilmington Avenue, Compton Avenue, and 119th Street. Compliance shall be determined by monitoring by regulatory agencies. Transport, storage, and handling of construction-related hazardous materials shall be consistent with the guidelines provided by the California Department of Transportation, Los Angeles Regional Water Quality Control Board, the South Coast Air Quality Management District, and the Certified Unified Program Agency. Each agency shall regulate and enforce, through permitting and record keeping, the monitoring and enforcement of this mitigation measure. ***Measure Hazards-5*** At least 30 days prior to approval of Tier I final plans and specifications for development, the Office of Statewide Health Planning and Development shall review and provide comments on the plans and specifications to ensure compliance with all requirements of the Department of Toxic Substances Control and in order to verify that the site remains unlisted on the Hazardous Materials and Substance Sites List maintained by the California Environmental Protection Agency, Department of Toxic Substances Control.	
	Tier II	
Implementation of Tier II of the proposed project would be expected to result in significant impacts to hazards and hazardous materials in relation to the release of hazardous materials into the environment and hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste, to existing or proposed schools located within one-quarter mile of the project site, and Government Code Section 65962.5.	***Measure Hazards-1*** To reduce surface water quality impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. A Spill Prevention Control and Countermeasures Plan shall be developed as a part of these requirements to address the handling of petroleum or other hazardous materials during refueling, operations and maintenance and other construction-related activities. The agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law. ***Measure Hazards-2*** To avoid exposure to asbestos-containing materials and lead-based paints during demolition, construction, and remediation activities, the County of Los Angeles and the Office of Statewide Health Planning and Development shall require that all such materials and wastes be identified and an Operations and Maintenance Plan developed prior to the issuance of demolition permits for each structure constructed prior to 1979. The Operations and Maintenance Plan shall ensure compliance with all applicable federal, state, and local requirements and specify all work to be done, including lead and asbestos surveys of structures to be demolished, proper handling and storage of lubricants and fuels for construction	Implementation of mitigation measure Hazards-1 and Hazards-2 for Tier II would reduce significant impacts related to the exposure of hazards and hazardous materials to below the level of significance. Implementation of mitigation measure Hazards-3 for Tier II would reduce significant impacts related to UST below the level of significance. Implementation of mitigation measure Hazards-4 for Tier II would reduce significant impacts related to exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon–contaminated soils during routine transport and disposal for both the construction phase and operational phase of the proposed project to below the level of significance. Implementation of mitigation measure Hazards-5 for Tier II would reduce significant impacts related to hazards and hazardous materials below the level of significance.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	equipment, and methods for remediation of asbestos-containing materials and lead-based paints, if necessary. The Operations and Maintenance Plan shall be submitted to the County of Los Angeles Department of Health Services for review and approval prior to initiation of construction and demolition activities for the MACC building, emergency room, storage building or the cooling towers. The Operations and Maintenance Plan shall, as appropriate and necessary, conform to the requirements of the Los Angeles County Department of Health Services (Local Enforcement Agency), South Coast Air Quality Management District, the Los Angeles Regional Water Quality Control Board, and the Department of Toxic Substances Control. Compliance with the Operations and Maintenance Plan shall be monitored by the County of Los Angeles Regional Planning Department throughout construction and demolition. To reduce impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. These agencies shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law. ***Measure Hazards-3*** Prior to the issuance of grading permits for development, the County of Los Angeles shall ensure that a Soil Management Plan is prepared for the project site and that the Office of Statewide Health Planning and Development reviews the grading plans to ensure that the construction contractor is required to stop work and notify the Certified Unified Program Agency of the unanticipated encounter of underground storage tanks during grading activities. In the event that any leaking underground storage tanks are located or encountered, the County of Los Angeles Department of Public Works shall be notified and the underground storage tank shall be remediated in accordance with County of Los Angeles guidelines and consistent with specifications of the Department of Toxic Substances Control and other relevant standards. The County of Los Angeles Fire Department Health Hazardous Materials Division shall be notified of all other contaminated soils encountered during construction-related site activities. ***Measure Hazards-4*** To avoid exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon–contaminated soils during routine transport and disposal for both the construction phase and operational phase of the project, the County of Los Angeles shall require that the construction contractor store, use, and transport all hazardous materials in compliance with all relevant regulations and guidelines. The routine transport of hazardous materials to and from the Martin Luther King, Jr. Medical Center Campus during construction and operation of the elements of the project shall be accomplished via Wilmington Avenue, Compton Avenue, and 119th Street. Compliance shall be determined by monitoring by regulatory agencies. Transport, storage, and handling of construction-related hazardous materials shall be consistent with the guidelines provided by the California Department of Transportation, Los Angeles Regional Water Quality Control Board, the South Coast Air Quality Management District, and the Certified Unified Program Agency. Each agency shall regulate and enforce, through permitting and record keeping, the monitoring and enforcement of this mitigation measure. ***Measure Hazards-5*** At least 30 days prior to approval of Tier II final plans and specifications for development, the Office of Statewide Health Planning and Development shall review and provide comments on the plans and specifications to ensure compliance with all requirements of the Department of Toxic Substances Control and in order to verify that the site remains unlisted on the Hazardous Materials and Substance Sites List maintained by the California Environmental Protection Agency, Department of Toxic Substances Control.	

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
Hydrology and Water Quality		
Implementation of Tier I of the proposed project would be expected to result in significant impacts to hydrology and water quality related to water quality standards, waste discharge, runoff water, and degrade water quality during construction and limited operation.	**Tier I** ***Measure Hydrology-1*** The County shall ensure that the construction, landscape features, and site grading for Tier I of the project comply with standard best management practices set forth by the Regional Water Quality Control Board. Prior to final plans and specifications for all elements of the project, the County of Los Angeles shall review the plans and specifications for all elements to ensure that the plans and specifications require the construction contractor to prepare a Standard Urban Stormwater Mitigation Plan for construction activities and implement best management practices for construction, materials, and waste handling activities, which will include, but not be limited to: • Scheduling excavation, grading, and paving activities for dry weather periods. • Controlling the amount of runoff crossing the construction site by means of berms and drainage ditches to divert water flow around the site. • Identifying potential pollution sources from materials and wastes that will be used, stored, or disposed of on the site. • Informing contractors and subcontractors about the clean storm water requirements and enforce their responsibilities in pollution prevention through a contractual agreement • Sweeping the streets surrounding the proposed project site daily and trash removal throughout the construction of the project to avoid degradation of water quality. ***Measure Hydrology-2*** The construction contractor shall incorporate Standard Urban Stormwater Mitigation Plan requirements and best management practices to mitigate storm water runoff, which include the following: • The incorporation of bio-retention facilities located within the project area • The incorporation of catch basin filtration systems • The use of porous pavements to reduce runoff volume ***Measure Hydrology-3*** In the event that groundwater is encountered during Tier I construction, the County of Los Angeles shall require the construction contractor complete the dewatering operations in accordance with the established National Pollution Discharge Elimination System permit requirements. ***Measure Hazards-1*** To reduce surface water quality impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. A Spill Prevention Control and Countermeasures Plan shall be developed as a part of these requirements to address the handling of petroleum or other hazardous materials during refueling, operations and maintenance and other construction-related activities. The agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.	Implementation of mitigation measures Hydrology-1 through Hydrology-3, in addition to Hazards-1, would reduce significant hydrology and water quality impacts related to construction-related water quality to below the level of significance.
Implementation of Tier II of the proposed project would be expected to result in significant	**Tier II** ***Measure Hydrology-1*** The County shall ensure that the construction, landscape features, and site grading for Tier II of the project comply with standard best management practices set forth by the Regional Water Quality Control Board. Prior to final plans and specifications for all elements of the project, the County of	Implementation of mitigation measures Hydrology-1 through Hydrology-4, in addition to Hazards-1, would reduce significant hydrology and water quality impacts related to construction- and operation-related water quality to below the level of significance.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
impacts to hydrology and water quality related to water quality standards, waste discharge, runoff water, and degrade water quality during construction and operation.	Los Angeles shall review the plans and specifications for all elements to ensure that the plans and specifications require the construction contractor to prepare a Standard Urban Stormwater Mitigation Plan for construction activities and implement best management practices for construction, materials, and waste handling activities, which will include, but not be limited to: • Scheduling excavation, grading, and paving activities for dry weather periods. • Controlling the amount of runoff crossing the construction site by means of berms and drainage ditches to divert water flow around the site. • Identifying potential pollution sources from materials and wastes that will be used, stored, or disposed of on the site. • Informing contractors and subcontractors about the clean storm water requirements and enforce their responsibilities in pollution prevention through a contractual agreement • Sweeping the streets surrounding the proposed project site daily and trash removal throughout the construction of the project to avoid degradation of water quality. ***Measure Hydrology-2*** The construction contractor shall incorporate Standard Urban Stormwater Mitigation Plan requirements and best management practices to mitigate storm water runoff, which include the following: • The incorporation of bio-retention facilities located within the project area • The incorporation of catch basin filtration systems • The use of porous pavements to reduce runoff volume ***Measure Hydrology-3*** In the event that groundwater is encountered during Tier I construction, the County of Los Angeles shall require the construction contractor to complete the dewatering operations in accordance with the established National Pollution Discharge Elimination System permit requirements. ***Measure Hydrology-4*** To ensure that operational impacts associated with Tier II remain below the level of significance, the County of Los Angeles shall require that best management practices and sustainable practices, such as regularly removing vegetation and debris from curbs, catch basins, and outlets; limiting the amount of pesticides and fertilizers used in landscaping, and other best management practice as recommended by the Environmental Protection Agency or in the California Stormwater Best Management Practice Handbooks as ongoing maintenance measures, are implemented into a maintenance plan for the campus. ***Measure Hazards-1*** To reduce surface water quality impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. A Spill Prevention Control and Countermeasures Plan shall be developed as a part of these requirements to address the handling of petroleum or other hazardous materials during refueling, operations and maintenance and other construction-related activities. The agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.	

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
Noise		
Implementation of Tier I of the proposed project would be expected to result in significant impacts to noise related to groundbourne temporary ambient noise increase during construction, vibration, and mechanical noise during construction.	**Tier I** ***Measure Noise-1*** The County of Los Angeles shall require that the plans and specifications require that construction equipment be equipped with state-of-the-art noise-muffling devices. Barriers or curtains shall be required to be installed close to equipment to shield the equipment from the receptor. Barriers or curtains utilized at the project site shall be required to reduce A-weighted construction noise levels at nearby sensitive receptors by a minimum of 10 dB. The height and length of the barriers or curtains shall be determined based on location of construction activity and receptor. Because of the close proximity of the source and receptors, the noise impact would be dependent on the location of the noise sources. Prior to the start of demolition and construction, the contractor shall develop a noise control plan based on the actual equipment that will be used during demolition and construction, and the location of various demolition and construction activities. If the actual equipment noise levels are not available, equipment noises shall be measured in the field. The noise control plan shall predict the noise levels with actual equipment and with barriers or curtains in place. In addition, the plan shall take into account the demolition and equipment mix that would be operated at the same time. Equipment mix and/or the number of equipment operating shall be considered in reducing the noise levels. ***Measure Noise-2*** Prior to the completion of final plans and specifications, the County of Los Angeles shall ensure that the plans and specifications include a requirement that all demolition and construction equipment be properly maintained. All vehicles and compressors shall utilize exhaust mufflers. Engine enclosure covers as designed by the manufacturer shall be in place at all times. The County of Los Angeles shall monitor the use of heavy equipment during all demolition and construction activities to ensure conformance with the requirements of properly maintained heavy equipment. ***Measure Noise-3*** The distance at which impact pile driving would not exceed a peak particle velocity of 0.2 inch per second at a residence would be 55 feet. Therefore, the County of Los Angeles shall require that impact pile driving not be utilized within 55 feet of a residential structure. Should pile driving be necessary within 55 feet of a residence, sonic pile driving shall be utilized. ***Measure Noise-4*** The County of Los Angeles shall ensure that mechanical noise generated by the project is less than 45 dBA at residences immediately south (approximately 50 feet) of the project. This shall be achieved by implementing one, or a combination of more than one of the following strategies: utilizing quiet mechanical systems; locating mechanical systems away from residences (mechanical systems that produce a noise level of 55 DBA at 50 feet would need to be located a minimum of 160 feet from residences to bring mechanical noise levels below 45 dBA at residences), or utilizing insulating screens to break the line-of-site between the mechanical systems and nearby residences.	The distance from the proposed project site at which impacts to affected residential structures would be below the level of significance is 80 feet. The nearest residential land use is approximately 50 feet south of the proposed project. Implementation of mitigation measures Noise-1 and Noise-2 would reduce construction noise at residential properties to the east and west of the campus to below the level of significance; however, construction noise levels would exceed the 75 dBA permissible level at residences south of the proposed project site that are within 80 feet of the proposed project property. Therefore, noise impacts from construction, while temporary, would remain significant and unavoidable. Implementation of mitigation measure Noise-3 would reduce significant impacts related to potential building damage from vibration during construction to below the level of significance. However, vibration levels would still be perceptible at sensitive receptors; therefore, vibration levels during construction of the proposed project would result in a significant and unavoidable impact. Implementation of mitigation measure Noise-4 would reduce significant impacts related to mechanical noise to below the level of significance.
Implementation of Tier II of the proposed project would be expected to result in significant impacts to noise related to groundbourne temporary ambient noise increase during construction, vibration, and mechanical noise during construction.	**Tier II** ***Measure Noise-1*** The County of Los Angeles shall require that the plans and specifications require that construction equipment be equipped with state-of-the-art noise-muffling devices. Barriers or curtains shall be required to be installed close to equipment to shield the equipment from the receptor. Barriers or curtains utilized at the project site shall be required to reduce A-weighted construction noise levels at nearby sensitive receptors by a minimum of 10 dB or to the maximum extent possible. The height and length of the barriers or curtains shall be determined based on the location of the construction activity and receptor. Because of the close proximity of the source and receptors, the noise impact would be dependent on the location of the noise sources. Prior to the start of demolition and construction, the contractor shall develop a noise control plan based on the actual equipment that will be used during	The distance from the proposed project site at which impacts to affected residential structures would be below the level of significance is 80 feet. The nearest residential land use is approximately 50 feet south of the proposed project. Implementation of mitigation measures Noise-1 and Noise-2 would reduce construction noise at residential properties to the east and west of the campus to below the level of significance; however, construction noise levels would exceed the 75 dBA permissible level at residences south of the proposed project site that are within 80 feet of the proposed project property. Therefore, noise impacts from construction, while temporary, would remain significant and unavoidable.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	demolition and construction, and the location of various demolition and construction activities. If the actual equipment noise levels are not available, equipment noises shall be measured in the field. The noise control plan shall predict the noise levels with actual equipment and with barriers or curtains in place. In addition, the plan shall take into account the demolition and equipment mix that would be operated at the same time. Equipment mix and/or the number of equipment operating shall be considered in reducing the noise levels. ***Measure Noise-2*** Prior to the completion of final plans and specifications, the County of Los Angeles shall ensure that the plans and specifications include a requirement that all demolition and construction equipment be properly maintained. All vehicles and compressors shall utilize exhaust mufflers. Engine enclosure covers as designed by the manufacturer shall be in place at all times. The County of Los Angeles shall monitor the use of heavy equipment during all demolition and construction activities to ensure conformance with the requirements of properly maintained heavy equipment. ***Measure Noise-3*** The distance at which impact pile driving would not exceed a PPV 0.2 inch per second at a residence would be 55 feet. Therefore, the County of Los Angeles shall require that impact pile driving will not be utilized within 55 feet of a residential structure. Should pile driving be necessary within 55 feet of a residence, sonic pile driving will be utilized. ***Measure Noise-4*** The County shall ensure that mechanical noise generated by the project is less than 45 dBA at residences immediately south (approximately 50 feet) of the project. This shall be achieved by implementing one, or a combination of more than one of the following strategies: utilizing quiet mechanical systems; locating mechanical systems away from residences (mechanical systems that produce a noise level of 55 DBA at 50 feet would need to be located a minimum of 160 feet from residences to bring mechanical noise levels below 45 dBA at residences), or utilizing insulating screens to break the line-of-site between the mechanical systems and nearby residences.	Implementation of mitigation measure Noise-3 would reduce significant impacts related to potential building damage from vibration during construction to below the level of significance. However, vibration levels would still be perceptible at sensitive receptors; therefore, vibration levels during construction of the proposed project would result in a significant and unavoidable impact. Implementation of mitigation measure Noise-4 would reduce significant impacts related to mechanical noise to below the level of significance.
Population and Housing		
Tier I The analysis undertaken for this EIR determined that no significant impacts related to population and housing would arise from implementation of the proposed project. Therefore, no mitigation measures are required. **Tier II** The analysis undertaken for this EIR determined that no significant impacts related to population and housing would arise from implementation of the proposed project. Therefore, no mitigation measures are required.		
Public Services		
Tier I The analysis undertaken for this EIR determined that no significant impacts related to public services would arise from implementation of the proposed project. Therefore, no mitigation measures are required. **Tier II** The analysis undertaken for this EIR determined that no significant impacts related to public services would arise from implementation of the proposed project. Therefore, no mitigation measures are required.		
Recreation		
Tier I The analysis undertaken for this EIR determined that no significant impacts related to recreation would arise from implementation of the proposed project. Therefore, no mitigation measures are required. **Tier II** The analysis undertaken for this EIR determined that no significant impacts related to recreation would arise from implementation of the proposed project. Therefore, no mitigation measures are required.		

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
Transportation/Traffic		
Implementation of Tier I of the proposed project would result in significant transportation and traffic impacts related to circulation system and congestion during construction.	**Tier I** ***Measure Traffic-1*** To reduce the traffic-related construction impacts, the County of Los Angeles shall require the construction contractor to provide a Construction Traffic Management Plan, to be prepared in accordance with the California Department of Transportation's Construction Manual and Manual on Uniform Traffic Control Devices. The Construction Traffic Management Plan shall at the minimum include: • Timing of deliveries of heavy equipment and building materials; • Directing construction traffic with a flag person; • Placing temporary signing, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic; • Identifying if improvements to the intersection of 120th Street, Wilmington Avenue, or Compton Avenue are necessary to accommodate the turning radii needed by large trucks accessing site; • Identifying multiple alternate ingress/egress access point for the circulation of traffic and emergency response vehicles; • Determining the need for construction work hours and arrival/departure times outside peak traffic periods; • Ensuring access for emergency vehicles to the project site; • Temporary closure of travel lanes or disruptions to street segments and intersections during materials delivery, transmission line stringing activities, or any other utility connections; • Maintaining access to adjacent property; • Specifying both construction-related vehicle travel and oversize load haul routes, minimizing construction traffic during the AM and PM peak hour, distributing construction traffic flow across alternative routes to access the proposed project site, and avoiding residential neighborhoods to the maximum extent feasible; and • Identifying vehicle safety procedures for entering and exiting site access roads.	Implementation of the mitigation measures Traffic-1 would reduce impacts generated during the construction of Tier I. Therefore, impacts from Tier I would be less than significant.
Implementation of Tier II of the proposed project would result in significant transportation and traffic impacts related to circulation system and congestion during construction, operation, and cumulatively.	**Tier II** ***Measure Traffic-1*** To reduce the traffic-related construction impacts, the County of Los Angeles shall require the construction contractor to provide a Construction Traffic Management Plan that is prepared in accordance with the California Department of Transportation's Construction Manual and Manual on Uniform Traffic Control Devices. The Construction Traffic Management Plan shall at the minimum include: • Timing of deliveries of heavy equipment and building materials; • Directing construction traffic with a flag person; • Placing temporary signing, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic; • Identifying if improvements to the intersection of 120th Street, Wilmington Avenue, or Compton Avenue are necessary to accommodate the turning radii needed by large trucks accessing site; • Identifying multiple alternate ingress/egress access point for the circulation of traffic and emergency response vehicles; • Determining the need for construction work hours and arrival/departure times outside peak traffic periods; • Ensuring access for emergency vehicles to the project site; • Temporary closure of travel lanes or disruptions to street segments and intersections during materials delivery, transmission line stringing activities, or any other utility connections; • Maintaining access to adjacent property;	Implementation of the mitigation measures Traffic-1 through Traffic-3 would reduce construction-related Tier II and construction and operational Tier II project impacts and cumulative project impacts to below the level of significance.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	• Specification of both construction-related vehicle travel and oversize load haul routes, the minimization of construction traffic during the AM and PM peak hour, distributing construction traffic flow across alternative routes to access the proposed project site, and avoiding residential neighborhoods to the maximum extent feasible; and • Identification of vehicle safety procedures for entering and exiting site access roads. ***Measure Traffic-2*** In order to address the Tier II project impacts, the County of Los Angeles shall complete the following improvements: • Compton Avenue/Imperial Highway – County of Los Angeles / City of Los Angeles: Re-stripe westbound approach to provide a separate right-turn lane. • I-105 / Imperial Highway: Provide a third northbound, left-turn lane by widening off-ramp by 10 feet for approximately 150 to 200 feet. • Wilmington Avenue / El Segundo Boulevard: Re-stripe eastbound and westbound approaches to have separate right-turn lanes. Allow buses to go through the intersection from the right-turn lanes. • Central Avenue / 120th Street: Re-stripe northbound approach to provide a separate right-turn lane. Also, widen the east leg by 3 feet on each curbside (i.e., reduce sidewalk along 120th Street east of Central Avenue by 3 feet for approximately 120 feet and re-stripe westbound 120th Street approach to provide a left-turn, two through lanes and a separate right-turn lane. • Wilmington Avenue / I-105 Eastbound Ramps – County of Los Angeles / California Department of Transportation: Provide an additional eastbound lane by widening (reducing the raised median on the ramp) the off-ramp. The eastbound approach would have a left-turn lane, shared left-right turn lane, and a separate right-turn lane. The sidewalks on either side of Wilmington Avenue (as noted above) would be reduced by 2 feet and the Wilmington Avenue roadway would be widened by 2 feet on either side (a total of 4 feet) from the south leg of this intersection. Provide an additional northbound left-turn lane by widening (reducing the medians). The northbound approach would have dual left-turn lanes and three through lanes. • Wilmington Avenue/118th Street – County of Los Angeles: Widen Wilmington Avenue roadway by 2 feet on either side and re-stripe to provide two through lanes, a shared through right-turn lane and dual left-turn lanes along the southbound approach. Re-stripe the westbound approach to provide a separate right-turn land and a share left-through lane. Northbound approach would have the same lane geometry as existing conditions. Under cumulative conditions, widen 118th Street roadway by 4 feet and re-stripe to provide a separate right-turn lane and shared left-through lane along the eastbound approach. • Wilmington Avenue / 120th Street-119th Street – County of Los Angeles: Widen Wilmington Avenue roadway by 2 feet on either side and re-stripe the southbound approach to provide a separate right-turn lane, three through lanes, and a left-turn lane. Re-stripe northbound approach to provide a shared through-right turn lane, two through lanes, and a left-turn lane. Remove median adjacent to northbound approach to facilitate three southbound receiving lanes. Restrict parking along Wilmington Avenue roadway during morning and evening peak periods along the eastside of Wilmington between 120th Street and Martin Luther King, Jr. Hospital Driveway entrance. Widen 120th Street west of Wilmington Avenue for 250 feet, on the south side by 2 feet, and re-stripe the eastbound approach to provide a separate right-turn lane, dual left-turn lanes, and a through lane. The westbound approach of 119th Street would have the same lane geometry as existing conditions. • Wilmington Avenue / Martin Luther King, Jr. Hospital Entrance-120th Street – County of Los Angeles: Re-stripe southbound approach to provide a separate right-turn lane, two through lanes, and a left-turn lane. Provide three northbound receiving lanes and restrict on-street curb parking along the eastside of Wilmington Avenue between Martin Luther King, Jr. Hospital Driveway and 120th Street and 120th Street and 119th Street during morning and evening peak hours.	

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
	Remove the median within the hospital entrance and re-stripe the driveway to provide dual left-turn lanes, a through lane, and a separate right-turn lane along the eastbound approach. Re-stripe to provide one receiving lane. The appropriate conceptual signing and striping plans shall be submitted to the County of Los Angeles Department of Public Works, Traffic and Lighting Division for review and approval during the planning phase. ***Measure Traffic-3*** In order to address the Tier II cumulative projects impacts, using County of Los Angeles traffic study guidelines, the following mitigation measures shall be implemented to alleviate the cumulative significant impacts: • Avalon Boulevard/El Segundo Boulevard—County of Los Angeles: Widen northbound approach by 2 feet and re-stripe the approach to provide a left turn lane, two through lanes, and a separate right-turn lane (10 feet, 10 feet, 10 feet, 12 feet). The approach could be widened by narrowing the 5-foot-wide median to a 3-foot-wide median, or by reducing the 12-foot-wide sidewalk to a 10-foot-wide sidewalk. This widening would need to occur all the way to an alley located approximately 100 feet south of the intersection. The bus stop at this approach would continue to be located at the same location; however, buses would be allowed to go straight through the intersection. • Alameda Street/El Segundo Boulevard—County of Los Angeles/Compton: Re-stripe northbound/southbound approaches and provide a southbound right-turn lane. The lanes along the north leg would be re-striped to provide 13-foot and 11-foot receiving lanes; 10-foot, 11-foot, 10-foot, and 12-foot approach lanes for southbound right, both southbound turns, and southbound right lanes, respectively. The lanes along the south leg would have a 13-foot shared right through-way, 11-foot through lane, 10-foot left-turn lane, 12-foot receiving lane, and a 20-foot receiving lane. Remove two on-street parking spaces along the southbound approach during peak hours. • Alameda Street/103rd Street—County of Los Angeles/Lynwood: Re-stripe eastbound approach to provide a 10-foot, left-turn lane and a 12-foot, left-right shared lane. The receiving lane would be re-striped for 18.5 feet. • Central Avenue/Rosecrans Avenue—County of Los Angeles/Compton: Re-stripe westbound approach to provide a separate right-turn lane. Allow buses to go through the intersection from the right-turn lane. • Central Avenue/El Segundo Boulevard—County of Los Angeles/Compton: Re-stripe southbound approach to provide a separate right-turn lane. Widen northbound approach by reducing median by 1 foot to 2 foot. Provide re-striping to show a separate northbound right-turn lane. Allow buses to go through the intersection from the right-turn lane. • Alameda Street/Imperial Highway—County of Los Angeles/City of Lynwood: Re-stripe southbound approach to provide the following roadway geometry: dual left-turn lanes, a through lane, a shared through-right turn lane, and a separate right-turn lane. The appropriate conceptual signing and striping plans shall be submitted to the County of Los Angeles Department of Public Works, Traffic and Lighting Division for review and approval during the planning phase.	
Utilities and Service Systems		
Tier I The analysis undertaken for this EIR determined that no significant impacts related to recreation would arise from implementation of the proposed project. Therefore, no mitigation measures are required.		
Implementation of Tier II of the proposed project would be expected to result in significant impacts to utilities and	**Tier II** ***Measure Utilities-1*** Prior to issuance of the permits to connect to the sewer system, the County of Los Angeles shall ensure payment of the connection fee for the capital facilities has been submitted to the appropriate Sanitation Districts of Los Angeles County for compliance with the California Health and Safety Code.	Implementation of mitigation measures Utilities-1 and Utilities-2 would reduce impacts to utilities and service systems related to wastewater treatment and solid waste to below the level of significance.

TABLE ES.4-1
SUMMARY OF SIGNIFICANT IMPACTS, Continued

Impact	Mitigation Measure	Level of Significance After Mitigation
services systems related to wastewater treatment requirements and solid waste compliance.	***Measure Utilities-2*** The County of Los Angeles shall review the plans and specifications for the proposed project and the parking facilities to ensure that adequate service areas are provided for trash and recycling receptacles for compliance with applicable federal, state, and local statutes related to solid waste, and to reduce direct and cumulative impacts from project operation and maintenance to below the level of significance. Prior to advertising for construction bids for the new building, the County of Los Angeles shall ensure that the plans and specifications designating locations for trash receptacles and recycling receptacles are in conformance with the California Solid Waste Reuse and Recycling Access Act of 1991. Wherever trash receptacles are provided throughout the project site, a recycling receptacle for plastic, aluminum, and metal shall also be provided. Signs encouraging patrons to recycle shall be posted near each recycling receptacle. To ensure conformance with the Solid Waste Management Act of 1989, the County of Los Angeles shall require the construction contractor to manage the solid waste generated during construction of each element of the project by diverting at least 50 percent of solid waste from disposal in landfills, particularly Class III landfills, through source reduction, reuse, and recycling of construction and demolition debris. The construction contractor shall submit a construction solid waste management plan to the County of Los Angeles for approval prior to initiation of demolition activities. The construction contractor shall demonstrate compliance with the solid waste management plan through the submission of monthly reports during construction and demolition activities that estimate total solid waste generated and diversion of 50 percent of the solid waste.	

ES.5 PROJECT ALTERNATIVES

As a result of the project formulation process, the County of Los Angeles (County) explored alternatives to the proposed project to assess their ability to meet most of the objectives of the project and reduce significant effects of the proposed project. Alternative projects recommended by the scoping process were evaluated as related to the project objectives and their ability to reduce significant impacts as described in Section 4.0 of this EIR. The No Project Alternative that is required under CEQA, as well as five other alternatives, have been carried forward for detailed analysis in this EIR:

- No Project Alternative
- Alternative 1: Reduced Project Size Alternative (900,000 square foot Tier II)
- Alternative 2: Re-opening the Existing MACC Alternative
- Alternative 3: Public Transportation Focused Alternative
- Alternative 4: 500 beds (in Tier I) Alternative
- Alternative 5: No Tier II Alternative

The No Project Alternative was determined to be the environmentally superior alternative. Following the No Project Alternative, the Re-opening the Existing MACC Alternative is the environmentally superior alternative. These alternatives are described and analyzed in Section 4.0, *Alternatives to the Proposed Project*, of this EIR.

SECTION 1.0
INTRODUCTION

This Environmental Impact Report (EIR) has been prepared by the County of Los Angeles (County) to assess the environmental consequences of the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project). The County is the lead agency for the proposed project pursuant to the California Environmental Quality Act (CEQA). The proposed project entails two tiers of redevelopment.

Tier I involves project-level development of the new Multi-Service Ambulatory Care Center (MACC) Building and the Ancillary Building, tenant improvements in existing buildings, site improvements, and the potential relocation of the Magnetic Resonance Imaging (MRI) Building. The MRI would be relocated to the tech dock behind the new MACC Building. Tier I would also entail site improvements and tenant improvements to the following existing buildings: the North Support Building, South Support Building, and Plant Management Building.

Tier II of the proposed project would entail the reuse or replacement of the existing MACC Building (which will be vacant following construction of the new MACC Building in Tier I) and demolition of the following: Emergency Room, Storage Building, and Cooling Towers. Tier II construction would entail additional master-planned mixed-use development, which may include the potential for medical offices, general offices, commercial and retail space, residential units, recreational areas, and other development in support of the campus. The maximum programmed development for Tier II is currently estimated at approximately 1,814,696 square feet.

The Tier II components of the proposed project are conceptual at this time, and have therefore been discussed in a programmatic level in the EIR, as permitted under §15168 of State CEQA Guidelines. Once the detailed future development plans for Tier II components are known, consistent with the guidelines for programmatic EIRs under CEQA, the projects will be examined in light of the program EIR analysis, to determine whether additional environmental document(s) must be prepared.

As such, this EIR provides a dual-level analysis for the proposed project. A project-level analysis will be prepared for Tier I, and a program-level analysis will be prepared for Tier II.

1.1 PURPOSE AND SCOPE OF ENVIRONMENTAL IMPACT REPORT

The County has prepared this EIR to support the fulfillment of the six major goals of CEQA:

- Disclose to the decision makers and the public significant environmental effects of the proposed activities
- Identify ways to avoid or reduce environmental damage
- Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures
- Disclose to the public reasons for agency approvals of projects with significant environmental effects
- Foster interagency coordination in the review of projects
- Enhance public participation in the planning process

Although the EIR neither controls nor anticipates the ultimate decision on the proposed project, the County (and other agencies that rely on this EIR) must consider the information in the EIR and make findings concerning each potentially significant impact identified.

1.1.1 Intent of CEQA

As provided in the State CEQA Guidelines (*California Code of Regulations*, Section 15000 et seq.), public agencies are charged with the duty to avoid or minimize environmental damage where feasible. In discharging this duty, the County has an obligation to balance a variety of public objectives, including economic, environmental, and social issues (Section 15021 of the State CEQA Guidelines). The findings and conclusions of the EIR regarding environmental impacts do not control the County of Los Angeles Board of Supervisors' discretion to approve, deny, or modify the project but, instead, are presented as information intended to aid the decision-making process. Sections 15122 through 15132 of the State CEQA Guidelines describe the required content of an EIR: a description of the project and the environmental setting (existing conditions), an environmental impact analysis, mitigation measures, alternatives, significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. As a combined project-level and program-level EIR, this document primarily focuses on the changes in the environment that would result from construction and operation of the proposed project. The County of Los Angeles Board of Supervisors is required to consider the information in the EIR, along with any other relevant information, in making final decisions on the proposed project (Section 15121 of the State CEQA Guidelines).

1.1.2 Environmental Review Process

A Notice of Preparation (NOP) concerning the EIR for the proposed project was circulated for a 30-day review period that began on March 8, 2010, and closed on April 6, 2010. An Initial Study was prepared to focus the environmental topic areas to be analyzed in the EIR. Copies of the NOP and the comment letters submitted in response to the Initial Study are included in this document (Appendix A, *Initial Study, Scoping Meeting Comments, and Comment Letters*). The Initial Study prepared for the proposed project identified the contents of the EIR, based on environmental issue areas anticipated to be potentially subject to significant impacts.

The NOP and Initial Study were sent to the State Clearinghouse on March 5, 2010, and distributed to 31 federal, state, regional, and local agencies. A public Notice of Availability (NOA) of the NOP was provided in two local newspapers: *L.A. Watts Times* newspaper on March 11, 2010, and *La Opinión* newspaper on March 8, 2010. The NOA, which noted the completion of the NOP and Initial Study, was mailed directly to more than 209 interested parties and to 1,276 property owners and resident within a 0.25-mile radius of the proposed project site. The NOP and Initial Study document were available for review and posted at the Martin Luther King, Jr. Medical Center and the Willowbook Library, located east of the proposed project site at 11838 South Wilmington Avenue, City of Los Angeles, California. The NOA of the NOP and Initial Study was also posted on the Web site of the Second Supervisorial District, at: http://ridley-thomas.lacounty.gov/blog/?cat=189.

Both the NOA and NOP advertised a public scoping meeting for interested parties to receive information on the proposed project and the CEQA process, as well as providing an opportunity for the submittal of comments. The scoping meeting facilitated early consultation with interested parties in compliance with Section 15082 of the State CEQA Guidelines. The meeting was held on Wednesday, March 24, 2010, at 6:00 p.m. at the Ted Watkins Memorial Park Gymnasium, located

at 1335 East 103rd Street, City of Los Angeles, California. More than 67 individuals attended the scoping meeting. Approximately 48 comments were collected at this meeting (Appendix A). The County requested information from the public related to the proposed project under consideration, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR. All verbal and written comments related to environmental issues that were provided during public review of the NOP and at scoping meetings have been taken into consideration in the preparation of this EIR. This EIR considers alternatives that are capable of avoiding or reducing significant effects of the project. The comment period on the NOP and Initial Study closed on Tuesday, April 6, 2010. Eight comment letters were received in response to the NOP and Initial Study (Appendix A), comprising six letters from agencies and two letters from individuals. Responses to these comments have been incorporated into the body of this EIR (Table 1.1.2-1, *Initial Study Comment Matrix*).

TABLE 1.1.2-1
INITIAL STUDY COMMENT MATRIX

Comment No.	Agency / Affiliation	Response Location in EIR
1	California Department of Transportation (Caltrans)	Responses to this letter were incorporated into Section 3.12, *Transportation and Traffic*, and Appendix H, *Traffic Impact Analysis*.
2	County of Los Angeles Department of Public Works, Traffic and Lighting Division	Responses to this letter were incorporated into Section 3.12, *Transportation and Traffic*, and Appendix H, *Traffic Impact Analysis*.
3	County of Los Angeles, Sheriff's Department	Responses to this letter were incorporated into Section 3.9, *Population and Housing*, and Section 3.10, *Public Services*.
4	Metropolitan Transportation Authority (MTA; Metro)	Responses to this letter were incorporated into Section 3.12, *Transportation and Traffic*, and Appendix H, *Traffic Impact Analysis*.
5	Native American Heritage Commission	Responses to this letter were incorporated into Section 3.3, *Cultural Resources*, and Appendix E, *Cultural Resources Technical Report*.
6	South Coast Air Quality Management District (SCAQMD)	Responses to this letter were incorporated into Section 3.2, *Air Quality*; Section 3.5, *Greenhouse Gas Emissions*; and Appendix C, *Air Quality and Greenhouse Gas Emissions Technical Impact Report*.
7	BuildTheDream.org	Responses to this letter were incorporated into Section 3.3, *Cultural Resources*, and Appendix E, *Cultural Resources Technical Report*.
8	Sanitation Districts of Los Angeles County, Facilities Planning Department, Will Serve Program	Responses to this letter were transmitted to the Sanitation Districts of Los Angeles County and incorporated into Section 2.0, *Project Description*.
*	Scoping Meeting Comments	Responses to these comments were incorporated throughout the EIR.

The County determined that the proposed project may have a significant effect on the environment and that the preparation of an EIR would be required. As a result of the analysis undertaken in the Initial Study, it was determined that the proposed project would not be expected to result in impacts to agriculture and forest resources, biological resources, mineral resources, and land use

and planning.[1] Those issue areas will receive no further analysis. However, the analysis in the Initial Study concluded that the proposed project has the potential to result in significant impacts related to 13 environmental topics, which are the subject of the detailed evaluation undertaken in this EIR:

- Aesthetics
- Air Quality
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

This Draft EIR has been distributed to various federal, state, regional, and local government agencies and interested organizations and individuals for a 45-day public review period. This Draft EIR was provided to the State Clearinghouse on August 30, 2010, for additional distribution to agencies. In addition, a public NOA of the EIR will appear in two local newspapers, *L.A. Watts Times* and *La Opinión*, and will be mailed directly to interested parties requesting the document (in either electronic or hard copy format). The dates of the public review period are Tuesday August 31, 2010, to Friday October 15, 2010, a period of 45 days. In addition, copies of this Draft EIR are available during the public review period at the following library:

Willowbrook Library
Ms. Alice Tang
Community Library Manager
11838 South Wilmington Avenue
Los Angeles, California 90059
Telephone number: (323) 564-5698
Hours of operation: Monday – 10:00 a.m. to 6:00 p.m.
Tuesday – 12:00 p.m. to 8:00 p.m.
Wednesday – 10:00 a.m. to 6:00 p.m.
Thursday –- 10:00 a.m. to 6:00 p.m.
Friday – 11:00 a.m. to 5:00 p.m.
Saturday – 11:00 a.m. to 5:00 p.m.
Sunday – Closed

[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc. Pasadena, CA.

The Draft EIR will also be available for review at the following location:

Martin Luther King, Jr. Multi-service Ambulatory Care Center
Administration Office
Elaine Saafir or Cynthia Moore-Oliver
12021 South Wilmington Avenue
Los Angeles, CA 90059
Telephone number: (310) 668-5201
Hours of operation: Monday–Friday 8:00 a.m. to 4:30 p.m.

Written comments on this Draft EIR should be transmitted during the public review period to the County of Los Angeles, Chief Executive Office, Sabra White, Kenneth Hahn Hall of Administration, 500 West Temple Street, Room 754, Los Angeles, California 90012.

Written comments provided by the general public and public agencies will be evaluated, and written responses will be prepared for all comments received during the designated comment period. Upon completion of the evaluation, a Final EIR will be prepared and provided to the County of Los Angeles Board of Supervisors for certification of compliance with CEQA and for review and consideration as part of the decision-making process for the proposed project.

1.2 ORGANIZATION AND CONTENT

This Draft EIR consists of the following sections:

- **Section ES, Executive Summary,** provides a summary of the existing setting, proposed project, identified significant impacts of the proposed project, and mitigation measures. Those alternatives that were considered to avoid significant effects of the project are identified in the Executive Summary. In addition, the Executive Summary identifies areas of controversy known to the County, including issues raised by agencies and the public. The Executive Summary includes a list of the issues to be resolved, including the choice among alternatives and whether or how to mitigate significant effects of the project.

- **Section 1, Introduction,** provides information related to the purpose and scope of the EIR, environmental review process, and the organization and content of the EIR.

- **Section 2, Project Description,** provides the location and boundaries of the proposed project, statement of objectives, a description of the technical, economic, and environmental characteristics of the project, considering the principal engineering proposals and supporting public service facilities. The project description identifies the intended uses of the EIR, including the list of agencies that are expected to use the EIR in their respective decision-making processes, a list of the related discretionary actions (permits and approvals) required to implement the proposed project, and a list of any related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies. The project description lists the related projects that were considered in the evaluation of the proposed project.

- **Section 3, Existing Conditions, Significance Thresholds, Impacts, Mitigation Measures, and Level of Significance after Mitigation,** describes existing conditions found at the project site and the surrounding area; lists the thresholds used to assess the potential for the proposed project to result in significant impacts; evaluates the potential impacts on environmental resources that may be generated by the proposed project, including the cumulative impacts of the proposed project in conjunction with other related projects in the area; identifies available mitigation measures to reduce significant impacts; and assesses the effectiveness of proposed measures to reduce identified impacts to below the level of significance. This portion of the EIR is organized by the applicable environmental topics resulting from the analysis undertaken in the Initial Study.

- **Section 4, Alternatives to the Proposed Project,** describes a range of reasonable alternatives to the proposed project or to the location of the proposed project. CEQA requires that the EIR explore feasible alternatives that would avoid or substantially lessen any of the significant effects of the proposed project. To be feasible, an alternative must be capable of attaining most of the basic objectives of the proposed project. CEQA requires an evaluation of the comparative impacts of the proposed project, action alternatives to the proposed project, and the no-project alternative.

- **Section 5, Significant Environmental Effects that Cannot be Avoided if the Proposed Project Is Implemented,** summarizes the significant effects of the proposed project.

- **Section 6, Significant Irreversible Environmental Changes,** evaluates potential uses of nonrenewable resources and potential irreversible changes that may occur during the course of the proposed project.

- **Section 7, Growth-Inducing Impacts,** evaluates the potential for the proposed project to foster economic growth or population growth, either directly or indirectly, in the surrounding environment.

- **Section 8, Organizations and Persons Consulted,** provides a list of all governmental agencies, community groups, and other organizations consulted during the preparation of this EIR.

- **Section 9, Report Preparation Personnel,** provides a list of all personnel that provided technical input to this EIR.

- **Section 10, References,** lists all sources, communications, and correspondence used in the preparation of this EIR.

- **Section 11, Distribution List,** provides a distribution list of agencies and libraries receiving this Draft EIR that was made available for a 45-day public review period.

SECTION 2.0
PROJECT DESCRIPTION

Consistent with the requirements of §15124 of the State California Environmental Quality Act Guidelines (State CEQA Guidelines), the project description of the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) includes the precise location and boundaries of the proposed project; a brief characterization of the existing conditions at the proposed project site; a statement of objectives for the proposed project; a general delineation of the proposed project's technical, economic, and environmental characteristics; and a statement describing the intended uses of the Environmental Impact Report (EIR).

2.1 PROPOSED PROJECT LOCATION

The proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) site is located on the existing 38-acre Martin Luther King, Jr. Medical Center Campus, at 12021 Wilmington Avenue in the unincorporated area of Willowbrook, County of Los Angeles (County), California (Figure 2.1-1, *Project Location Map*).

The proposed project site is located approximately 3 miles north of State Route 91 (SR-91; Artesia Freeway), approximately 3 miles northeast of Interstate 710 (I-710; Long Beach Freeway), approximately 2 miles east of I-110 (Harbor Freeway), less than 1 mile south of East Imperial Highway, and less than 1 mile south of I-105 (Glen Anderson Freeway) (Figure 2.1-2, *Regional Vicinity Map*). The proposed project site can be accessed from East 120th Street or from Wilmington Avenue.

The proposed project site is bounded on the north by East 120th Street, on the east by Wilmington Avenue, on the south by a narrow alley separating the proposed project site from the residential neighborhood that is largely located north of East 122nd Street, and on the west by Compton Avenue of Los Angeles. The proposed project site is less than 1 mile north of the City of Compton. The proposed project site is also less than 1 mile south of the City of Los Angeles (Figure 2.1-3, *Local Vicinity Map*). The proposed project is also located less than 1 mile west of the City of Lynwood.

The proposed project site appears on the U.S. Geological Survey (USGS) 7.5-minute series South Gate topographic quadrangle (Figure 2.1-4, *Topographic Map*).[1] Elevations at the proposed project site range from 86 feet above mean sea level (MSL) to 88 feet above MSL.[2] The topography of the site can be generally characterized as flat.

2.2 BACKGROUND AND EXISTING CONDITIONS

2.2.1 Background

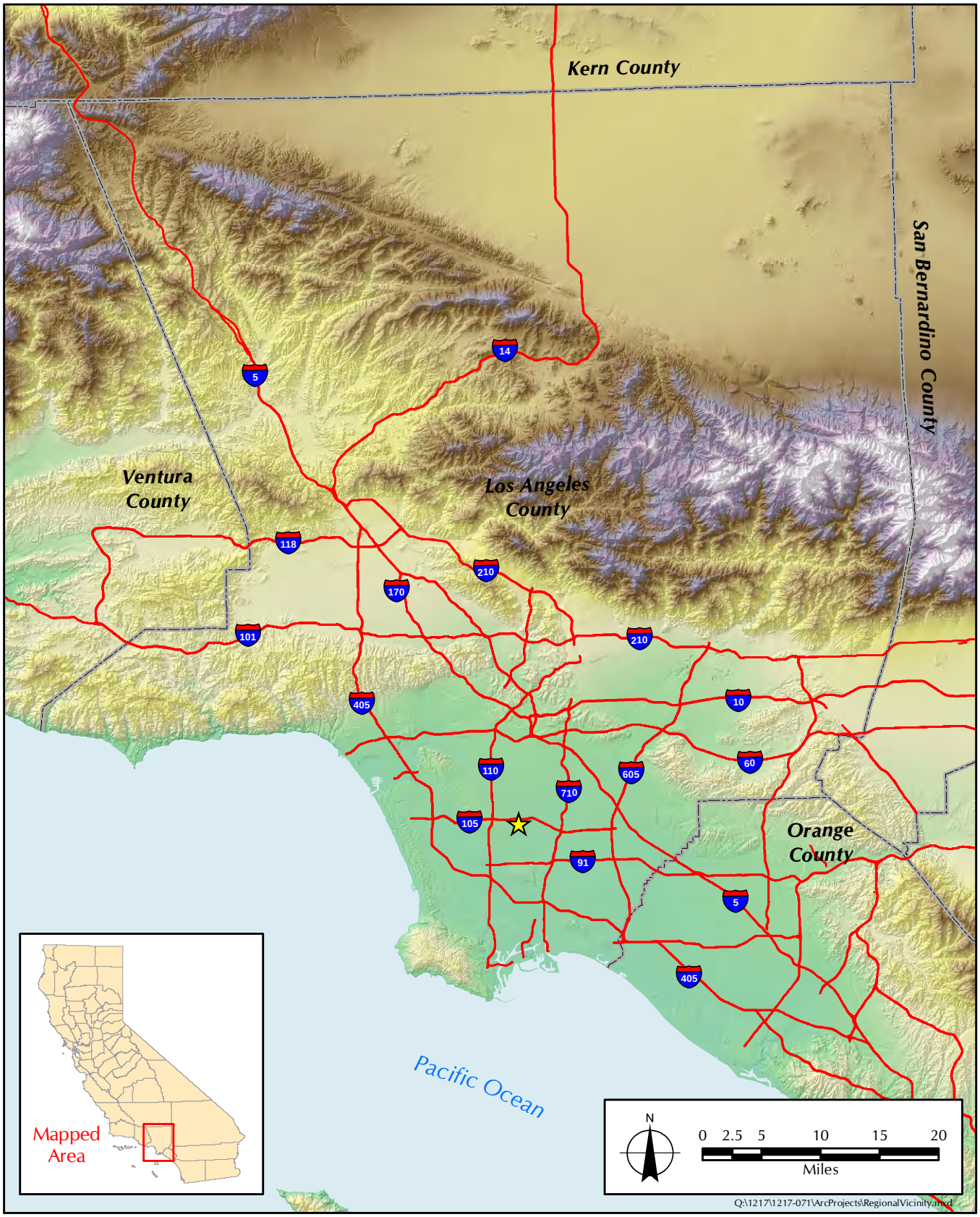
The Martin Luther King, Jr. Medical Center Campus began operations in 1972. The Martin Luther King, Jr. Medical Center Campus was developed to address a need for local community services in

[1] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[2] Sapphos Environmental, Inc. 2010. Geographic Information System. Pasadena, CA.

FIGURE 2.1-1

Project Location Map



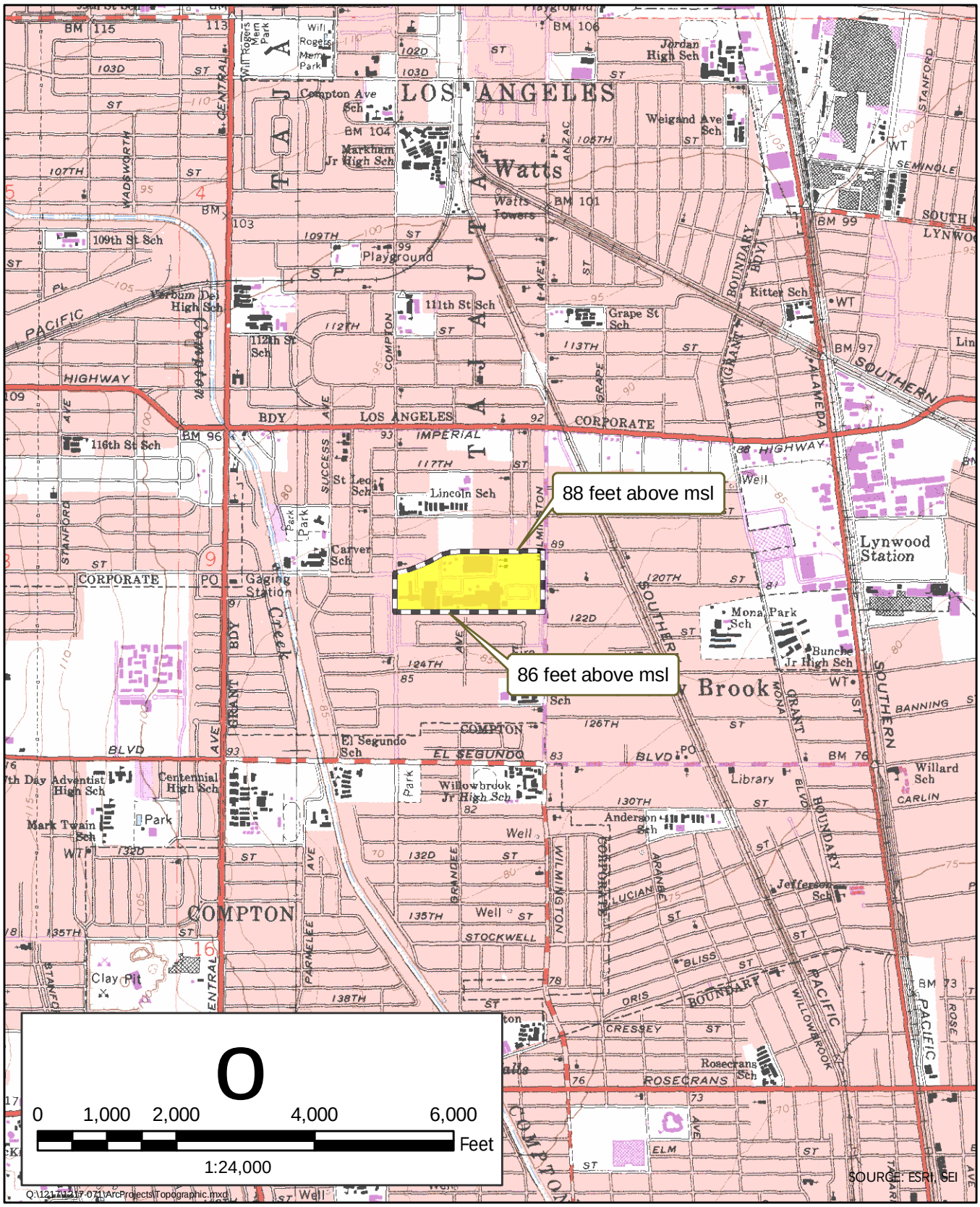
Proposed Project Location

FIGURE 2.1-2

Regional Vicinity Map

FIGURE 2.1-3

Local Vicinity Map



Proposed Project Boundary

FIGURE 2.1-4

Topographic Map

South Los Angeles. Following the 1965 Watts Civil Unrest/Riots, a commission appointed by the Governor reported a lack of healthcare access as one of the contributing factors to the unrest.[3]

The hospital was operational from 1972 to August 2007, when the license was suspended for the provision of inpatient services at the Martin Luther King, Jr. Medical Center Campus due to concerns over the quality of service at the hospital. Currently, the existing Martin Luther King, Jr. Medical Center Campus (existing campus) is only partially operational and does not provide inpatient services. However, the proposed project site provides various outpatient and administrative support services. Figure 2.2.1-1, *MLK Timeline of Planning and Environmental Review Process*, identifies key dates related to the construction and operation of the existing campus and the proposed project.

In 2009, the County initiated improvements to the existing campus to provide community-based inpatient hospital functions and support spaces that would be seismically compliant beyond the 2030 seismic standards established by the Office of Statewide Health and Planning Development (OSHPD). These improvements to the existing campus would be an adjacent and ongoing project.

In 2009, a Categorical Exemption was approved by the County Board of Supervisors for minor renovations and improvements to the existing campus. This process allowed the minor renovations and improvements to the campus to be exempt from the CEQA process under Class 1, "Existing Facilities;" Class 2, "Replacement or reconstruction of existing schools and hospitals to provide earthquake resistant structures which do not increase capacity more than 50 percent;" and Class 3, "New Construction or Conversion of Small Facilities;"[4] Categorical Exemption [Sections 15301, 15302, and 15303 of the Guidelines], pursuant to the requirements specified in Section 15300.2 of the State CEQA Guidelines.

The upgrades that will be completed as part of the ongoing CEQA-exempt project on the campus include renovation and improvements of up to 172,591 square feet within the Inpatient Tower to include hospital beds and other hospital functions, including the placement of the Emergency Department (ED) on the first floor of the Inpatient Tower, renovation to the basement and second floor, and build-out of three unused upper floors to accommodate the hospital functions use. In addition, the improvements include necessary renovations within other buildings on the existing campus to accommodate various hospital support functions, hospital administration support, and other outpatient services. Renovations to house the hospital support functions and hospital administration support will be placed in the Pediatric Acute Care, Medical Records and Laundry, North Support, South Support, Central Plant, and Plant Management buildings. Renovations to house the outpatient services will be placed in the existing Multi-Service Ambulatory Care Center (MACC; formerly known as the Main Hospital Building). The Pediatric Acute Care building will be renovated to serve as the hospital entry and lobby area. Finally, a Pneumatic Tube System (PTS) will be installed in the penthouse to the roof of the Inpatient Tower building. The PTS will serve the Inpatient Tower, the new MACC, and Augustus F. Hawkins Comprehensive Mental Health Center buildings. The work described above will operate with the capacity of up to 120 licensed beds; the 120 beds will be located on the first through fifth floors of the Inpatient Tower. These adjacent and ongoing CEQA-exempt improvements to the campus serve as existing conditions and a related project for the proposed project, and are not part of Tier I or Tier II of the proposed project.

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[3] County of Los Angeles. Accessed 9 October 2009. *Los Angeles County Health Services, MLK-MACC*. Available at: http://www.ladhs.org/wps/portal/KingHomepage

[4] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15301–3.

1965 – Watts Civil Unrest
A commission appointed by the Governor Edmund G. "Pat" Brown reports a lack of healthcare access as one of the contributing factors to the Watts Civil Unrest/Riots (also 1965)

1966 – Hospital Program Concept Developed
The Los Angeles County Department of Hospitals established a task force to develop a program concept that would provide a full-service community teaching hospital operated by the County in conjunction with the Drew Medical Society, USC, and UCLA.

1972 – Hospital Begins Operations
Martin Luther King, Jr. Medical Center Campus begins operations. The new hospital accepted its first patients (March 27, 1972)

1970s - Interns and Physicians Constructed
Interns and Physicians Building is constructed on the Martin Luther King, Jr. Medical Center Campus

1973 – South Support Constructed
The South Support building is constructed on the Martin Luther King, Jr. Medical Center Campus

1973 – North Support Constructed
The North Support Building is constructed on the Martin Luther King, Jr. Medical Center Campus

August 2007 – License Suspended
The license is suspended for the provision of inpatient services at the Martin Luther King, Jr. Medical Center Campus due to concerns over levels of service

December 2008 – Hospital Reopening Initiated
The County of Los Angeles initiates improvements to the existing campus to provide community-based inpatient hospital functions and support spaces that would be seismically compliant beyond 2030 seismic standards established by the Office of Statewide Health and Planning Development (OSHPD). Includes renovations and improvements to the existing Inpatient Tower and MACC, and the placement of 120 beds within the Inpatient Tower

August 2009 – Town Hall Meeting
Supervisor Ridley-Thomas hosted a Town Hall meeting at Drew Magnet High School on August 1st to discuss the New Martin Luther King Hospital

August 2009 – BOS UnanimouslySupport New MLK
County of Los Angeles Board of Supervisors unanimously support plan to build a new MLK Medical Center Campus

January 2010 – Planning Workshop
County and the Second Supervisorial District host a community planning workshop to gather ideas from the community regarding the Master Plan for the MLK Medical Center Campus

March 2010 – Scoping Meeting
The County hosts a public scoping meeting for the environmental impact report (EIR) addressing the MLK Medical Center Campus Redevelopment project under the California Environmental Quality Act (CEQA)

1960 1970 1980 1990 2007 2008 2009 2010

1968 – Ground Braking Ceremony
Groundbreaking ceremony for Martin Luther King Jr. General Hospital was held on May 4, 1968.

1968 – Main Hospital Constructed
The building now referred to as the Multiservice Ambulatory Care Center (MACC) Building is constructed on the Martin Luther King, Jr. Medical Center Campus.

1968 – Central Plant Constructed (Phase I).
Phase I of the Central Plant building is constructed on the Martin Luther King, Jr. Medical Center Campus.

1968 – Medical Records and Laundry Constructed
The Medical Records Building is constructed on the Martin Luther King, Jr. Medical Center Campus

1975 – Central Plant Constructed (Phase II)
The Phase II of the Central Plant building is constructed south of the Phase I building on the Martin Luther King, Jr. Medical Center Campus.

1979 – Hawkins Constructed
The Augustus F. Hawkins Comprehensive Mental Health Center is constructed on the Martin Luther King, Jr. Medical Center Campus (Construction Drawing Date 1977).

1992 – Pediatric Acute Care Constructed
The Pediatric Acute Care Building is constructed on the Martin Luther King, Jr. Medical Center Campus).

1993 – Inpatient Tower Constructed
The Inpatient Tower is constructed on the Martin Luther King, Jr. Medical Center Campus

December 2008 – UC Partnership Initiated
At the direction of the Board of Supervisors, the County of Los Angeles (County) Chief Executive Office approached the University of California (UC) to assist the County with developing options to provide hospital services at the Martin Luther King, Jr. Medical Center Campus

December 2008 – Jumpstart Reopening Process
County of Los Angeles Board of Supervisors approves Supervisor Ridley-Thomas' request for a plan to help 'jump start' process to reopen MLK Medical Center Campus

November 2009 – BOS Approve MLK Motion
County of Los Angeles Board of Supervisors approves motion to expedite design services on the new MLK Medical Center Campus

December 2009 – Community Meeting
County and the Second Supervisorial District host a project introduction meeting to present plans for the MLK Medical Center Campus Redevelopment project to the community which would include: re-opening the MLK Medical Center Campus, construction a new MACC, an Ancillary Building and related site improvements, as well as the preparation of a Master Plan for the MLK Medical Center Campus that would allow a mix of uses

FIGURE 2.2.1-1
MLK Timeline of Planning and Environmental Review Process

The renovations and improvements to the campus as described above will allow the hospital to regain its license and quickly and cost-effectively meet the unmet inpatient needs for the community, while also allowing the County to reopen a fully functional medical campus that more accurately reflects community needs.

The existing structures within the proposed project site are described in the following section. The existing campus information described in this section are based on information provided by the County Chief Executive Office and County Department of Public Works, as well as from information described in a Martin Luther King, Jr. Medical Center Campus Planning Programming Report that was prepared by HMC Architects.[5]

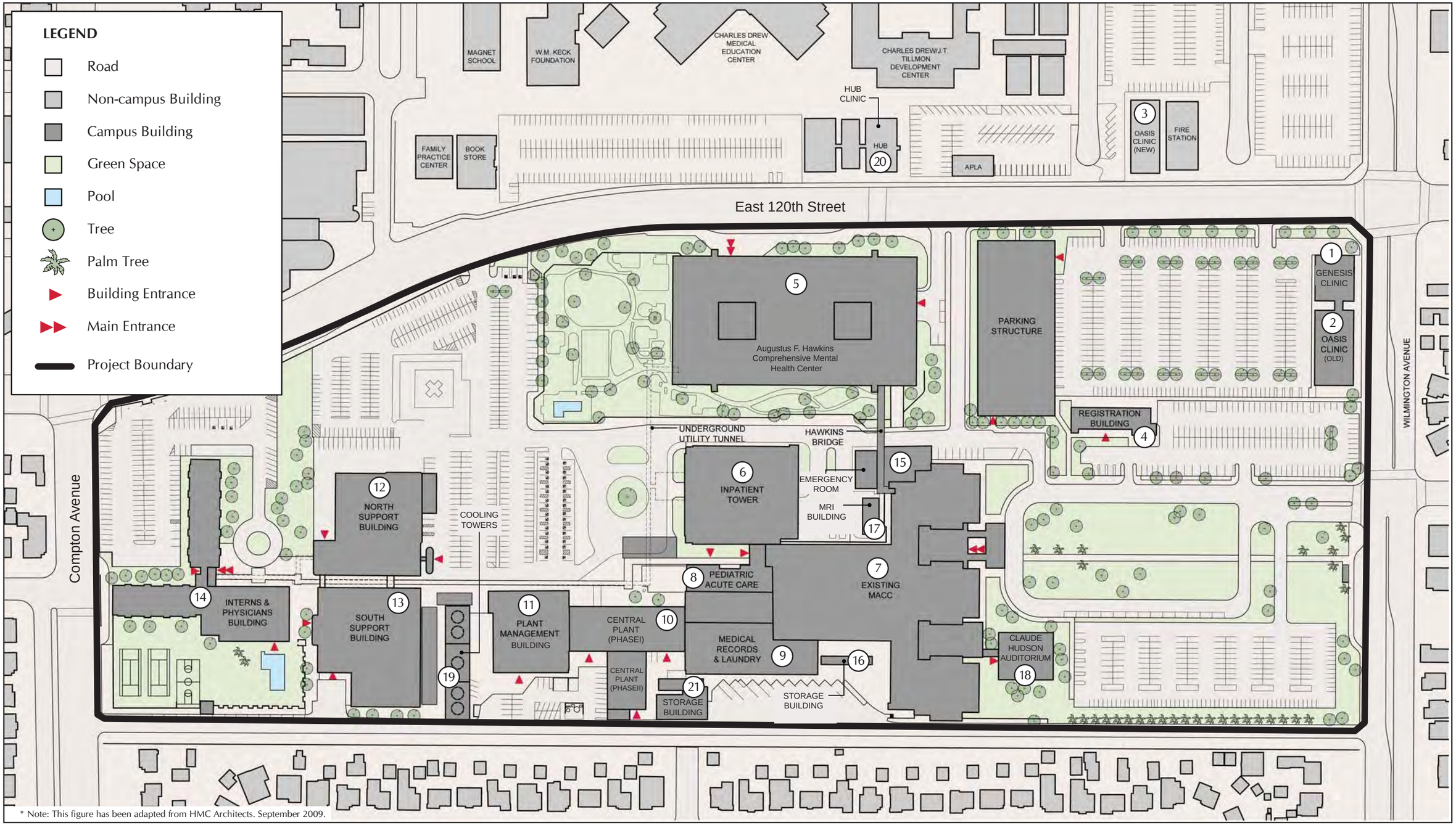
2.2.2 Existing Structures

The proposed project site consists of 15 main buildings: Genesis Clinic, Oasis Clinic (old), Oasis Clinic (new),[6] Registration Building, Augustus F. Hawkins Comprehensive Mental Health Center, Inpatient Tower, MACC, Pediatric Acute Care Building, Medical Records and Laundry Building, Central Plant, Plant Management Building, North Support Building, South Support Building, Interns and Physicians Building, and Hub Clinic.[7] There is also a multi-level parking structure available for parking and six support and ancillary buildings and facilities including: an Emergency Room, Magnetic Resonance Imaging (MRI) Building, Claude Hudson Auditorium, Cooling Towers, and two storage buildings on the proposed project site (Figure 2.2.2-1, *MLK Existing Campus Plan*, and Table 2.2.2-1, *Existing Buildings and Structures*). Below are structural descriptions and status of the existing buildings and other structural components. The developed floor area (not including the parking structure) is approximately 1.2 million square feet. The existing conditions on the campus (which may exclude some of the ongoing renovations and improvements to the buildings as described above in Section 2.2.1, Background) provide the existing baseline conditions for these buildings.

[5] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

[6] The Oasis Clinic (new) and the Hub Clinic buildings are located north of the existing 38-acre campus but are considered part of the existing campus structures and operations.

[7] The Hub Clinic and the Oasis Clinic (new) buildings are located north of the existing 38-acre campus but are considered part of the existing campus structures and operations.



* Note: This figure has been adapted from HMC Architects. September 2009.

FIGURE 2.2.2-1
MLK Existing Campus Plan

TABLE 2.2.2-1
EXISTING BUILDINGS AND STRUCTURES

	Building / Structure Name	Floor Area (square feet)	Would Buildings/ Structures Remain Following the Tier II Development of the Proposed Project? (Y/N)	Floors	Currently Operational	Footprint of Campus Buildings / Structures (square feet)
1	Genesis Clinic	2,100	Y	1	N	2,100
2	Oasis Clinic (old)	2,580	Y	1	N	2,580
3	Oasis Clinic (new)	1,850	Y	1	Y	1,850
4	Registration Building	10,950	Y	2	Y	5,475
5	Augustus F. Hawkins Comprehensive Mental Health Center	226,818	Y	3 (and a basement)	Y	75,606
6	Inpatient Tower	187,676	Y	5 (and a basement)	Y	37,535
7	MACC	495,335	N	5 (and a basement)	Y (only partially operational)	99,067
8	Pediatric Acute Care	7,878	Y	1	Y	7,878
9	Medical Records and Laundry	26,355	Y	1	Y	26,355
10	Central Plant (I and II)	24,103	Y	1	Y	24,103
11	Plant Management Building	15,648	Y	1	Y	15,648
12	North Support Building	52,276	Y	2	Y	26,138
13	South Support Building	34,762	Y	2	Y	17,381
14	Interns and Physicians Building	124,391	Y	6	Y (only partially operational)	20,731
15	Emergency Room	3,300	N	1	Y	3,300
16	Storage Building	1,060	N	1	Y	1,060
17	MRI Building	1,100	Y	1	Y	1,100
18	Claude Hudson Auditorium	3,922	Y	1	Y	3,922
19	Cooling Towers[a]	6,790	N	1	Y	6,790
20	Hub Clinic	12,265	Y	1	Y	12,265
21	Storage Building[b]	2,533	Y	1	Y	2,533
	EXISTING CAMPUS TOTAL	**1,243,692**				**393,417**

NOTE:
a. These structures would likely be reused, replaced, or removed following the reuse, replacement, or removal of the existing MACC Building.
b. This building is in the footprint of the Central Plant expansion, but may just be incorporated during design and remain.

2.2.2.1 Genesis Clinic

The Genesis Clinic is a 2,100-square-foot outpatient clinic located on the north-eastern portion of the proposed project site. The Genesis Clinic is attached by a walkway to the Oasis Clinic. This clinic is currently not operational.

2.2.2.2 Oasis Clinic (Old)

The Oasis Clinic is a 2,580-square-foot Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome (HIV/AIDS) clinic that provided comprehensive HIV/AIDS medical care to patients, while it was operational. The services of this clinic included nutritional counseling; treatment education; women's services; mental health; on-site case management; Aids Drug Assistance Program enrollment, orientation, and education for patients diagnosed with HIV; hormone therapy; and adolescent services. This clinic is currently not operational.

2.2.2.3 Oasis Clinic (New)

The Oasis Clinic is a 1,850-square-foot HIV/AIDS clinic that provides comprehensive HIV/AIDS medical care to patients. The services of this clinic include nutritional counseling; treatment education; women's services; mental health; on-site case management; Aids Drug Assistance Program enrollment, orientation, and education for patients diagnosed with HIV; hormone therapy; and adolescent services.

2.2.2.4 Registration Building

The 10,950-square-foot Registration Building is a two-story building, which provides office space in support of the campus. The registration building is located off the existing main entrance of the proposed project site, off Wilmington Avenue.

2.2.2.5 Augustus F. Hawkins Comprehensive Mental Health Center

The existing 226,818-square-foot Augustus F. Hawkins Comprehensive Mental Health Center is a three-story building with a partial one-level basement and was constructed in 1979. The building provides inpatient and outpatient mental healthcare. This building is composed of reinforced-concrete construction. The lateral-force-resisting system is composed of reinforced-concrete shear walls. The foundation system is composed of reinforced-concrete piles. The building is categorized by the OSHPD as Structural Performance Category–4 (SPC-4), which means that the building can remain functional to beyond the year 2030.

2.2.2.6 Inpatient Tower

The 187,676-square-foot Inpatient Tower was constructed in 1993. This building consists of a five-floor facility with a one-level basement that provides outpatient services. The roof of the Inpatient Tower contains a helipad that is used for hospital specific emergency use. The building is base isolated, utilizing rubber-bearing isolators and sliders to reduce the seismic forces or accelerations experienced by the building in a seismic event. The building superstructure is composed of structural steel construction. The gravity system utilizes a concrete-filled metal deck supported by structural steel beams, girders, and columns. Special concentric-braced frames are used for the building's lateral-force-resisting system. The foundation system is composed of cast-in-place concrete-drilled piles. The SPC of the building is categorized by California OSHPD as SPC-5, which is the highest SPC rating and permits the building to be used for hospital functions beyond the year 2030.

The CEQA-exempt, ongoing project includes installation of a pneumatic tube blower room on the roof of the existing building. This would probably require strengthening of the building as well as localized strengthening of the framing to support the added weight.

2.2.2.7 Multi-Service Ambulatory Care Center Building

The existing 495,335-square-foot MACC was constructed in the late 1960s. This building is a six-story building with a penthouse constructed in the late 1960s. The building consists of three structurally independent buildings: Central Tower, North Tower, and South Tower. This building was formerly used as a 437-bed inpatient, outpatient, and emergency facility. All components of the MACC Building are composed of reinforced concrete construction. The gravity system utilizes two-way reinforced concrete slabs supported by reinforced concrete beams and columns. The lateral-force-resisting system is composed of reinforced concrete shear walls. The foundation system is composed of cast-in-place concrete drilled piles. The SPC of the building is categorized by OSHPD as SPC-1. In order to provide inpatient services, the existing MACC would require significant seismic improvements in January 2013 for compliance with OSHPD requirements. Solely for the purposes of this analysis, it has been anticipated that this structure will be replaced in order to adopt the most conservative approach to the environmental analysis; however, the disposition of the building will be determined by the future Master Plan.

2.2.2.8 Pediatric Acute Care Building

The existing 7,878-square-foot Pediatric Acute Care Building is a one-story building with a mezzanine level and was constructed in 1992. The building is composed of structural steel construction. The gravity system utilizes a concrete-filled metal deck supported by structural steel beams, girders, and columns. Special concentric braced frames are used for the building's lateral-force-resisting system. The foundation system is composed of cast-in-place concrete drilled piles. The building is categorized by OSHPD as SPC-3, which permits the building to remain functional to the year 2030 and beyond. The existing Nonstructural Performance Category (NPC) of the building is NPC-3. Under the CEQA-exempt ongoing project, the building will be upgraded to continue to be used for hospital functions.

2.2.2.9 Medical Records and Laundry Building

The existing 26,355-square-foot Medical Records Building is a one-story building constructed in 1972. The building is composed of reinforced-concrete construction. The gravity system utilizes two-way reinforced-concrete slabs supported by reinforced-concrete beams and columns. The lateral-force-resisting system is composed of reinforced-concrete shear walls. The foundation system is composed of cast-in-place concrete drilled piles. The building is categorized by the OSHPD as SPC-2, which means that the building can remain functional until only the year 2030, unless it is brought into compliance with the OSHPD structural provisions. Under the CEQA-exempt ongoing project, the building will be upgraded seismically to bring it up to OSHPD SPC-4 or SPC-5, thus allowing the building to be used for inpatient functions until the year 2030 and beyond. The seismic retrofit work would include the addition of new reinforced-concrete shear walls, mitigation of existing discontinuous shear wall conditions, and possible localized strengthening of existing foundations. The building is also expected to be completely gutted, and all new nonstructural and information technology work would comply with the current code.

2.2.2.10 Central Plant

The 24,103-square-foot Central Plant was constructed in two phases. The Phase I component is a single-story building, with partial mezzanine floor, built in the 1960s. The roof structure consists of reinforced concrete one-way slab supported by tapered steel girders. Concrete shear walls form the perimeter of the building and provide the seismic bracing for the building. The foundation system

of the building consists of cast-in-place concrete piles. However, the mechanical, electrical, and plumbing equipment upgrade within it and some structural work (voluntary) were performed in 1993 under OSHPD permit number HS912289. OSHPD records show the building rated as SPC-1. Under the CEQA-exempt ongoing project, the building will be upgraded seismically to bring it up to OSHPD SPC-4 or SPC-5, thus allowing the building to be used for hospital function until the year 2030 and beyond.

The Central Plant Phase II building, located to the south of the Phase I building, was constructed in 1975. The building structure currently has an SPC-4 rating; therefore, no seismic retrofit upgrade of the building is required. The construction of the Phase II building is similar to the Phase I building. There is an underground water storage tank, measuring 47 feet by 47 feet by 22.5 feet deep and occupying the southern half of the building. Construction of water storage tank consists of cast-in-place concrete slabs and walls. Under the CEQA-exempt ongoing project, new plant equipment will be placed on the floor slab above the tank, which may require strengthening.

The CEQA-exempt ongoing project, a 6,000-square-foot expansion to the Central Plant will include installation of chiller equipment on the roof.

2.2.2.11 Plant Management Building

The 15,648-square-foot Plant Management Building supports campus functions at the proposed project site. This building is architecturally comparable to the other structures on the proposed project site in that it has concrete walls. Under the CEQA-exempt ongoing project, renovations and improvements to the interior of the building may be required.

2.2.2.12 North Support Building

The existing 52,276-square-foot North Support Building is a two-story building, constructed in two phases. The original building, which consisted of the lower full level and a partial second level, was built as a concrete structure in 1973. The second floor and roof consist of two-way waffle slab supported on concrete columns. Perimeter concrete walls provide lateral bracing to the structure. Foundation system consists of cast-in-place drilled pile. The second phase consisted of capturing the setback area over the second floor at the east side to provide additional space in the late 1980s. The addition was constructed of steel framing with concrete fill roof deck. The two phases appear to be connected so that the buildings function structurally as one. Under the CEQA-exempt ongoing project, interior renovations to the first and second floors will be included.

2.2.2.13 South Support Building

The 34,762-square-foot South Support building is a single-story concrete building with partial mezzanine floor, built in the early 1970s. Construction is similar to the North Support Building. The gravity system of the building consists of concrete waffle slab supported on concrete columns. The lateral-force-resisting system is composed of reinforced concrete shear walls. Under the CEQA-exempt ongoing project, interior renovations will be included.

2.2.2.14 Interns and Physicians Building

The 124,391-square-foot Interns and Physicians Building is a six-story building also built in the 1970s. This building is currently not fully operational. This building housed mainly the interns and physicians involved in the Physician Assistant Program of the Charles R. Drew Postgraduate

Medical School. This building is architecturally comparable to the other structures on the proposed project site in that it has concrete walls.

2.2.2.15 Emergency Room

The 3,300-square-foot Emergency Room is connected to the northwestern portion of the existing MACC Building. This one-story structure served as a waiting room for the emergency room. Solely for the purposes of this analysis, it has been anticipated that this structure will be replaced in order to adopt the most conservative approach to the environmental analysis; however, the disposition of the building will be determined by the future Master Plan.

2.2.2.16 Storage Building

The 1,060-square-foot, one-story Storage Building is currently used for campus storage. This building is located south of the existing MACC Building and may be reused, replaced, or removed following the reuse, replacement, or removal of the existing MACC Building. Solely for the purposes of this analysis, it has been anticipated that this structure will be replaced in order to adopt the most conservative approach to the environmental analysis; however, the disposition of the building will be determined by the future Master Plan.

2.2.2.17 Magnetic Resonance Imaging Building

The 1,100-square-foot MRI Building houses the MRI systems. This one-story structure is located north of the existing MACC Building and may be relocated to the tech dock behind the new MACC Building in Tier I of the proposed project.

2.2.2.18 Claude Hudson Auditorium

The 3,922-square-foot Claude Hudson Auditorium is a one-story structure that is attached by a walkway to the existing MACC Building. This building may remain following the reuse, replacement, or removal of the existing MACC Building. Solely for the purposes of this analysis, it has been anticipated that this structure will be replaced in order to adopt the most conservative approach to the environmental analysis; however, the disposition of the building will be determined by the future Master Plan.

2.2.2.19 Cooling Towers

The 6,790-square-foot Cooling Towers are one-story structures that serve the heat removal and heating, ventilating, air conditioning functions of the existing MACC. These structures may be reused, replaced, or removed following the reuse, replacement, or removal of the existing MACC Building in Tier II of the proposed project. Solely for the purposes of this analysis, it has been anticipated that this structure will be replaced in order to adopt the most conservative approach to the environmental analysis; however, the disposition of the building will be determined by the future Master Plan.

2.2.2.20 Hub Clinic

The 12,265-square-foot Hub Clinic is situated north of the Hawkins Building off East 120th Street. This is a one-story building. The Hub Clinic services the needs of children and families in the foster care system.

2.2.2.21 Storage Building

The 2,533-square-foot, one-story Storage Building is currently used for storage. This building is located south of the Central Plant and Medical Records and Laundry Buildings. This building will be removed under the CEQA-exempt ongoing project. Solely for the purposes of this analysis, it has been anticipated that this structure will be replaced in order to adopt the most conservative approach to the environmental analysis; however, the disposition of the building will be determined by the future Master Plan.

2.2.2.22 Additional Support Structures

Existing Tunnel

The existing underground utility tunnel was constructed in two phases. The Phase I tunnel extends north from the north side of Central Plant Phase I and connects to the east-west segment serving the existing MACC Building to the east and Interns and Physicians Building to the west. The Phase I tunnel was constructed in the early 1970s. Under the CEQA-exempt ongoing project, the existing Phase I tunnel will be seismically retrofitted to obtain an SPC-5 rating.

The Phase II tunnel consists of north-south segment extending north from the Phase I tunnel to serve the Hawkins Building and Inpatient Tower. The Phase II tunnel was built in late 1970s.

2.2.3 Existing Operational Conditions

The existing campus currently provides urgent care services and outpatient clinic services. The Urgent Care Center consists of 27 treatment spaces and operates out of the space that was previously occupied by the Emergency Department.[8] The Urgent Care Center treats non-life-threatening medical problems such as sprains or fractures, minor injuries and rashes, and colds and fevers.[9] The Urgent Care Center is open from 7:00 a.m. to 11:00 a.m. daily.[10] There are currently 70 specialty Outpatient Clinics operating at the existing hospital.[11] The Outpatient Clinics provide general medical care ranging from general medicine to HIV/AIDS, cardiology, dermatology, dentistry, geriatrics, neurology, orthopedic, and physical therapy.[12] Outpatient Clinics operate Monday through Friday from 8:00 a.m. to 5:00 p.m.[13] The Outpatient Clinics provide services for approximately 160,000 individuals annually (the patient volume capacity is described further below).[14] There are currently approximately 621 employees at the partially operational hospital.

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[8] Los Angeles County Health Services. Accessed 2 February 2010. "Departments and Clinics." Available at: http://www.ladhs.org/wps/portal/KingHomepage

[9] Los Angeles County Health Services. Accessed 2 February 2010. "Departments and Clinics." Available at: http://www.ladhs.org/wps/portal/KingHomepage

[10] Los Angeles County Health Services. Accessed 29 July 2010. "Departments and Clinics." Available at: http://www.ladhs.org/wps/portal/KingHomepage

[11] Los Angeles County Health Services. Accessed 2 February 2010. "Departments and Clinics." Available at: http://www.ladhs.org/wps/portal/KingHomepage

[12] Los Angeles County Health Services. Accessed 29 July 2010. "Departments and Clinics." Available at: http://www.ladhs.org/wps/portal/KingHomepage

[13] Los Angeles County Health Services. Accessed 29 July 2010. "Departments and Clinics." Available at: http://www.ladhs.org/wps/portal/KingHomepage

[14] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report- Executive Report*. Los Angeles, CA.

The Outpatient Clinics and Departments currently available at the MLK Medical Center Campus include, but are not limited to:[15]

- Ancillary Services
  - Echocardiogram
  - Electroencephalogram
  - Occupational Therapy
  - Physical Therapy
- Community Health Plan
  - Adult
  - Pediatric
- Internal Medicine
  - Cardiology
  - Chemotherapy
  - Chest
  - Dermatology
  - Diabetic
  - Dietary
  - Endocrinology
  - Gastroenterology
  - General medicine
  - Geriatrics
  - Hematology-Oncology
  - Hypertension
  - Neurology
  - OASIS HIV/AIDS Clinic
  - Renal
- Obstetrics/Gynecology
  - Colposcopy
  - Gynecology
  - Gynecology oncology
  - Obstetrics
- Ophthalmology
  - General eye
- Oralmaxillofacial
  - General Dental
  - Oral surgery
- Orthopedic
  - General Orthopedic
  - Hand Orthopedic
- Otolaryngology (Ear, Nose, and Throat)
  - Adult allergy
  - Audiology
  - General (Ear, Nose, and Throat)
  - Oncology (Head and Neck)
- Pediatric

[15] Los Angeles County Health Services. Accessed 2 February 2010. "Departments and Clinics." Available at: http://www.ladhs.org/wps/portal/KingHomepage

    - Allergy
    - Cardiology
    - Chest
    - Dermatology
    - HUB (Children in Foster Care)
    - Pediatric Intervention Program
    - Nutrition
- Pulmonary Services
- Pharmacy
- Radiology Services
    - Magnetic Resonance Imaging (MRI)
    - Mammography
    - Nuclear Medicine
    - Ultrasound
- Surgery
    - Breast (Minor)
    - General surgery
    - Prostate
    - Urology

Although the license was suspended for the provision of inpatient services at the proposed project site, it is understood that the existing campus has the capacity to be fully operational. Therefore, despite the fact that the campus is currently only partially operational, the past operational use of the existing campus will provide a reference for the capacity of the proposed project site to operate at full capacity and will also be utilized to further establish baseline conditions for this analysis.

2.2.3.1 Patient Volume

The existing patient volume on the campus is largely determined by the MACC patient volume and services. The patient volume capacity for the MACC, based on the 2008–2009 workload and estimates, is as follows: 160,000 annual outpatient services visits (including 11,000 walk-in clinic visits); 10,000 inpatient visits; 30,000 annual emergency services visits; 2,700 inpatient surgery procedures; and 3,500 outpatient surgery procedures.

2.2.3.2 Accessibility

The existing campus is accessible via both pedestrian and vehicular traffic. Public access is available off 120th Street and Wilmington Avenue. There is a service entry to the loading docks and buildings located off Compton Avenue, and there is one ambulance emergency department entry to the existing campus located off 120th Street.

2.2.3.3 Parking

Approximately 1,767 parking spaces are currently provided on-site in seven designated parking areas, as well as miscellaneous surface parking interspersed throughout the campus.[16] The total

[16] HMC Architects. 18 August 2010. *Martin Luther King, Jr. Medical Center Parking Inventory*. Prepared for: County of Los Angeles. Pasadena, CA.

1,767 parking spaces are comprised of 1,678 standard spaces, 83 accessible spaces, and 6 temporary parking spaces.[17]

Following completion of the CEQA-exempt ongoing project, there will be approximately 1,925 parking spaces on the campus.[18] Although a minimum of 2,220 parking spaces would be required for Tier I of the proposed project by County Code,[19] a parking forecast prepared for the existing campus determined that approximately 1,915 parking spaces were required for Tier I on the existing campus due to the proximity of public transportation.[20] Additionally, parking utilization observations and counts at the existing campus have noted that on average, there is a parking surplus on the campus of more than 41 percent during the peak parking demand hour (11 a.m.).[21]

Furthermore, it has been noted that:[22]

- The County Code parking requirements are essentially intended to accommodate the peak parking demand for uses on a "stand-alone" basis, and therefore do not account for parking efficiencies obtained when complementary medical uses are developed in a campus environment. For example, medical staff (physicians, nurses, etc.) may work in different buildings throughout the day while patients may arrive for an appointment in one office and then be administered a test or treatment in a separate building. Thus, the synergies and efficiencies of these complementary uses contribute to some "double-counting" when estimating parking demand based in the cumulative Code parking requirements of the individual facilities; [and]

- The Medical Center is well-served by public transportation, thereby reducing the need for travel by automobiles. As previously noted, stations for the Metro Green Line and Metro Blue Line are within walking distance to the Medical Center. Further, public buses operated by Metro (Lines 55, 202, 205, 305, 612) and other local transit agencies including the MLK Shuttle, the Hahn's Trolley and Shuttle Service, and the Los Angeles County Dial-A-Ride serve the campus. Accordingly, there are substantial public transportation options for staff, patients and visitors that allow for a reduction in parking demand.

Currently, the observed peaking parking demand on the campus is approximately 1,052 parking spaces.[23] Additionally, it is anticipated that the peak parking demand may rise to roughly 1,142

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[17] HMC Architects. 18 August 2010. *Martin Luther King, Jr. Medical Center Parking Inventory*. Prepared for: County of Los Angeles. Pasadena, CA.

[18] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

[19] Linscott, Law, Greenspan Engineers. 27 May 2010. *Martin Luther King, Jr. Medical Center Updated Parking Review*. Prepared for: County of Los Angeles. Pasadena, CA.

[20] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

[21] Linscott, Law, Greenspan Engineers. 27 May 2010. *Martin Luther King, Jr. Medical Center Updated Parking Review*. Prepared for: County of Los Angeles. Pasadena, CA. Utilization counts were conducted over the course of several days in April 2009 and May 2010 and were performed by Linscott, Law, Greenspan Engineers and The Traffic Solution for Linscott, Law, Greenspan Engineers.

[22] Linscott, Law, Greenspan Engineers. 27 May 2010. *Martin Luther King, Jr. Medical Center Updated Parking Review*. Prepared for: County of Los Angeles. Pasadena, CA.

[23] HMC Architects. 18 August 2010. *Martin Luther King, Jr. Medical Center Parking Inventory*. Prepared for: County of Los Angeles. Pasadena, CA.

following completion of ongoing campus improvements.[24] During construction it is anticipated that the total available parking spaces will drop as low as 1,289 parking spaces.[25] However, the available parking on campus would be sufficient to ensure that parking spaces are available during and after construction of both tiers of the proposed project.

2.2.3.4 Public Transportation

Public transportation in the vicinity of the proposed project include: the Metropolitan Transportation Authority (MTA), Los Angeles Department of Transportation Downtown Area Short Hop (LADOT-DASH), the City of Compton Renaissance Transit System, the City of Gardena Municipal Bus Line, Rosewood Smart Shuttle, Lynwood Trolley, Torrance Transit System, Carson Circuit System, Long Beach Transit (LBT), and the Hahn Trolley Shuttle Service, which is discussed below.

The existing campus is currently accessible by multiple means of public transportation. There are two bus stations located on the existing campus boundary: one bus station is located on the northern boundary on 120th Street, and one bus station is located on the eastern boundary on Wilmington Avenue. In addition, Metro Blue Line and Green Line stations are located approximately 0.5 mile northeast of the existing campus; the Metro Blue Line and Green Line stations have a shuttle bus that transports individuals between the existing campus and the metro stations. It is anticipated that these public transportation services would continue to operate during construction and following completion of the proposed project. The County will coordinate with the public transportation providers to ensure the compatibility of the proposed project with these services.

The County Board of Supervisors currently funds the *Hahn's Trolley and Shuttle Service*, which provides shuttle services to the community surrounding the existing campus. *Hahn's Trolley and Shuttle Service* operates three interconnecting routes. The County also funds a van service, *L.A. County Dial-A-Ride,* in the community surrounding the campus that provides transportation service for senior citizens and people with disabilities who reside within the unincorporated areas of Willowbrook, Walnut Park, Florence/Graham, Athens, Rosewood, and Rancho Dominguez.

2.2.3.5 Utilities

The existing campus is connected to the public utilities, water, gas, and sewer through a system of underground piping, valves, and access points to all the buildings. This complex piping system is used to maintain the connectivity from the buildings to the utilities in the streets.[26]

Existing utilities for the campus are provided through the following equipment and structures: underground utility tunnel, cooling towers, electrical equipment, bulk oxygen (O_2) storage, gas cylinders, generator fuel storage, central plant, underground fuel tanks, and emergency generators.

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[24] HMC Architects. 18 August 2010. *Martin Luther King, Jr. Medical Center Parking Inventory*. Prepared for: County of Los Angeles. Pasadena, CA.

[25] HMC Architects. 18 August 2010. *Martin Luther King, Jr. Medical Center Parking Inventory*. Prepared for: County of Los Angeles. Pasadena, CA.

[26] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

Electrical Infrastructure

The existing campus is served by the Southern California Edison Company. The existing campus has the capacity to supply approximately 10 megawatts of power to the campus. A review of the existing electrical infrastructure has determined the following: (1) portions of the existing campus electric system equipment and cable, which receive power at 4,160 volts (V), have not been upgraded since the hospital was constructed in the 1970s; these systems would be replaced as part of the ongoing campus improvements; (2) many building power systems on the existing campus would need to meet the requirements of the California Electric Code and National Fire Protection Association 99, Standard for Health Care facilities. Furthermore, building power diesel generators do not meet the existing Air Quality Management District emissions requirements, and the electrical systems require modifications that will be addressed under the CEQA-exempt ongoing project.

2.2.3.6 Water Use

Water use at the existing campus has varied over time. The average water use on the campus between the years 2002 and 2006 was more than 80 million gallons (or 107,793 hundred cubic foot (HCF) unit) of water per year.[27] The maximum annual amount of water consumption at the campus was roughly 88 million gallons. It is anticipated that the maximum water consumption amounts for Tier I of the proposed project would result in a decrease in water use from this amount. It is further anticipated that Tier II of the proposed project would include sustainable design elements including, but not limited to, sustainable and water-efficient features. As such the annual water use at the proposed project site would not be expected to be significantly greater than the maximum operational usage amount of approximately 88 million gallons.

2.2.4 Existing Campus Surroundings

The areas surrounding the existing Martin Luther King, Jr. Medical Center Campus include various commercial, retail, transit, and institutional land uses. Among these uses are the Charles Drew University of Medicine and Science (CDU), the Rosa Parks Transit Station, the Kenneth Hahn Plaza and Village, and various residential neighborhoods, commercial businesses, public and semipublic, industrial, open space, and transportation corridor uses.

2.2.4.1 Charles Drew University of Medicine and Science

The CDU is located between 118th Street to the north and 120th Street to the south. Historically, the existing campus and CDU have maintained a complimentary relationship; the existing campus has been used by CDU as a teaching hospital. In 2008, CDU opened a health clinic to provide service to some patients that have been impacted by the suspension of the license for the provision of inpatient services at the Martin Luther King, Jr. Medical Center Campus.[28] Just north of the existing campus, CDU is joined by other institutional uses, including the King Drew Magnet High School of Medicine and Science, and Lincoln Drew Elementary School. The CDU is not part of the proposed project; however, it is a relevant existing condition that neighbors the proposed project site.

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[27] One (1) HCF equals 748 gallons of water. Baseline water use information provided by the County of Los Angeles, 2009.

[28] Charles Drew University of Medicine and Science. Accessed 26 January 2010. Web site. Available at: http://www.cdrewu.edu/news/2008/urgent-care-clinic

2.2.4.2 Rosa Parks Transit Station

The Rosa Parks Transit Station is located northeast of the existing campus. This station houses the Metro Blue Line and Green Line stations described in Section 2.2.3.4, *Public Transportation,* of this project description. As previously noted, the Metro Blue Line and Green Line stations have a shuttle bus that transports individuals between the existing campus and the metro stations.

2.2.4.3 Other Surrounding Uses

The Kenneth Hahn Plaza and Village at Willowbrook shopping center are located northeast and east of the existing campus. These areas house commercial, retail, and other uses including a public library.

These properties are not currently included in the Martin Luther King, Jr. redevelopment efforts, as they are owned and operated by various private and public entities. However, in response to the community's interest in the inclusion of the development of these properties along with the existing campus (which is owned by the County), the County is currently reviewing alternatives and opportunities to include these properties in a master plan that encompasses the surrounding community.

2.2.5 General Plan Land Use Designation

The proposed project site consists of County Office of the Assessor parcel numbers (APNs) 6140-028-902, 6140-028-900, 6140-028-907, and 6140-028-903. The County General Plan land use designation for these APNs is Public and Semipublic Facilities (P). According to the County General Plan, the Public and Semipublic land use designation provides for activities by public and quasipublic entities and allows for the establishment of facilities, infrastructure, and their related operations in these areas that are public or semipublic in nature, including hospitals (Figure 2.2.5-1, *General Plan Land Use*).[29] The current use of the proposed project site as a medical facility is in conformance with this land use designation.

The land use designations surrounding the proposed project site include the Public and Semipublic Facilities and Major Commercial (C) to the north, Medium-density Residential [12 to 22 dwelling units (du)/acre] to the east, Low-density Residential (1 to 6 du/acre) to the south, and Low-density Residential (1 to 6 du/acre) and Low/Medium-density Residential to the west. Other land uses within the vicinity of the proposed project site include High-density Residential, Major Commercial, Major Industrial, Open Space, and Transportation Corridor.

2.2.6 Zoning

The County zoning designation for all project parcels (APNs 6140-028-902, 6140-028-900, 6140-028-907, and 6140-028-903) is Neighborhood Commercial (C-2; Neighborhood Business Zone) (Figure 2.2.6-1, *Zoning Designations*). This zoning designation is established to identify community-related commercial uses and permits the following uses: drugstores, medical clinics

[29] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

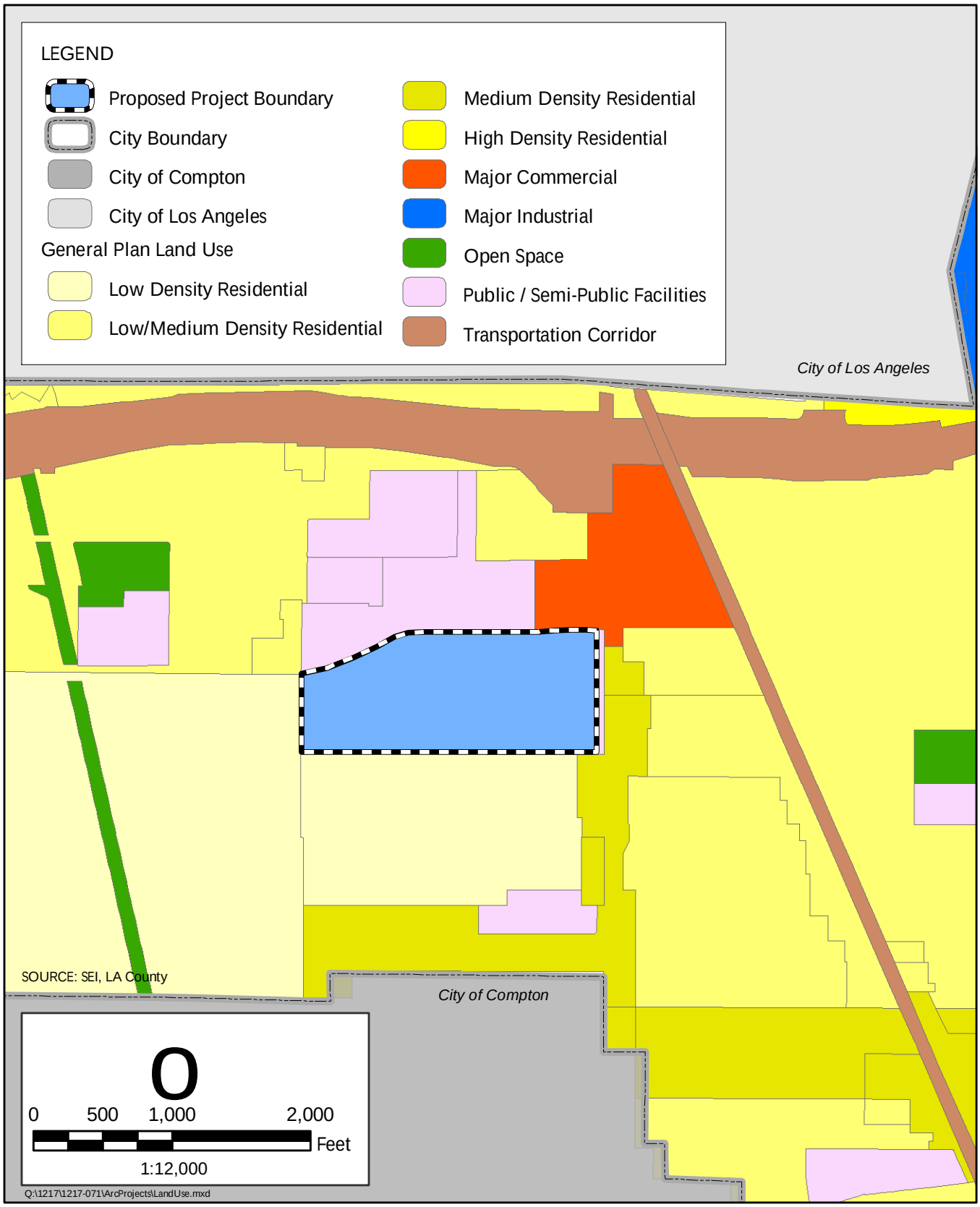


FIGURE 2.2.5-1
General Plan Land Use

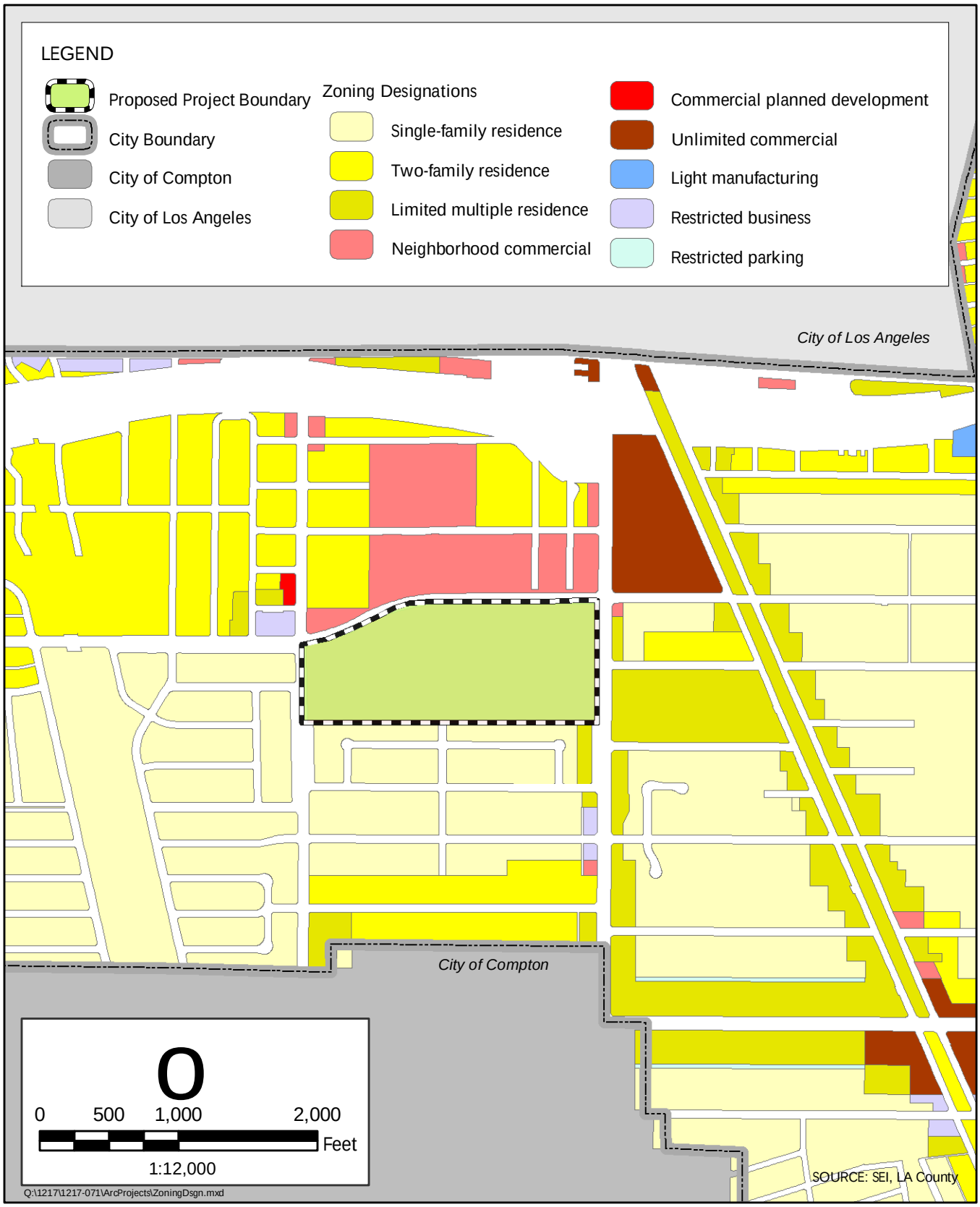


FIGURE 2.2.6-1
Zoning Designations

(including laboratories), professional or business office space, parking lots and buildings, and hospital equipment and supply rentals.[30]

The County has established development standards for the Neighborhood Business Zone:

> No more than 90 percent of the net area [shall] be occupied by buildings, with a minimum of 10 percent of the net area landscaped with a lawn, shrubbery, flowers and/or trees, which shall be continuously maintained in good condition. Incidental walkways, if needed, may be developed in the landscaped area; that there be parking facilities as required by Part 11 of Chapter 22.52; and that a building or structure shall not exceed a height of 35 feet above grade, excluding signs which are permitted by Part 10 of Chapter 22.52 (such as chimneys, and rooftop antennas).[31]

Zoning designations surrounding the proposed project site include Single-family Residential (R-1) to the south and west, Limited Multiple Residences (R-3) to the east, and Two-family Residence (R-2) and Commercial (C-2; specifically, Neighborhood Commercial) to the north. Other zoning designations within the vicinity of the proposed project site include Commercial Planned Development, Unlimited Commercial, Light Manufacturing, Restricted Business, and Restricted Parking. The proposed project's hospital-related uses would be consistent with the existing and permitted uses of this zoning designation, and no General Plan amendment or zone change would be required. However, uses related to residential development would be subject to a conditional use permit and would be required to meet the conditions of the permit.[32] It is anticipated that the County would obtain a conditional use permit during the planning phase of the proposed project and would be required to meet the specified conditions.

The County would further seek to ensure compatibility of the proposed project with the existing campus and its surroundings but reserves the right to exempt elements of the proposed project from the zoning designation. It is anticipated that the future campus development and master plan will provide land use designations, recommended capital improvements, and design guidelines to provide for the consistent and compatible development of the campus with the existing buildings in a manner that meets the needs of the community, consistent with the County's General Plan and zoning regulations.

2.3 STATEMENT OF PROJECT GOAL AND OBJECTIVES

2.3.1 Goal

The goal of the proposed project is to provide new campus improvements and to reopen a fully functional medical campus that meets the community needs for quality health care.

The County seeks to establish the Martin Luther King, Jr. Medical Center Campus as a center of excellence for health care delivery, urban health promotion and prevention, health workforce

[30] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[31] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[32] County of Los Angeles. Accessed 12 November 2009. *Title 22, Planning and Zoning.* Available at: http://ordlink.com/codes/lacounty/_DATA/TITLE22/Chapter_22_28_COMMERCIAL_ZONES.html#3

development, academic research and teaching, and economic development. The campus provides an opportunity to develop up to an additional 1,814,696 square feet for a mix of uses, including space for medical offices, commercial, retail, residential, recreation, and general offices, in addition to any other development that will improve the community-based health program facility with a net new increase of 1,476,010.

2.3.2 Tier I: Project Development Objectives

The County identified and prioritized the basic objectives that are important in achieving the proposed project goals for Tier I:

- Revitalize the Martin Luther King, Jr. Medical Center Campus through the provision of comprehensive medical care.
- Demonstrate leadership in sustainable planning and design.
- Create a campus environment that encourages pedestrian movement and optimizes connectivity, staff interaction, and links to the community.
- Develop a campus that is contextually integrated with the County of Los Angeles and respects the surrounding communities.
- Improve the efficiency and quality of staff and tenant services.
- Maintain the 2,100-square-foot Genesis Clinic; 2,580-square-foot Oasis Clinic (old); 1,850-square-foot Oasis Clinic (new); 10,950-square-foot Registration Building; 226,818-square-foot Augustus F. Hawkins Comprehensive Mental Health Center; 187,676-square-foot Inpatient Tower; 7,878-square-foot Pediatric Acute Care; 26,355-square-foot Medical Records and Laundry; 24,103-square-foot Central Plant; 15,648-square-foot Plant Management; 52,276-square-foot North Support Building; 34,762-square-foot South Support Building; 124,391-square-foot Interns and Physicians Buildings; 3,922-square-foot Claude Hudson Auditorium; 1,100-square-foot MRI Building; and 12,265-square-foot Hub Clinic Building.
- Provide a 24,700-building-gross-square-footage (BGSF) space to accommodate the Ancillary Building to house the cafeteria, administrative functions, and support services for the MACC and the Inpatient Tower.
- Provide a 132,000-BGSF space to accommodate the MACC program.
- Provide 34,000 square feet of tenant improvements to accommodate support functions in the North Support, South Support, Interns and Physicians, and Plant Management Buildings.
- Connect to an upgraded central plant to service the MACC, North Support Building, South Support Building, Inpatient Tower, and Interns and Physicians Building.
- Provide a parking area to allow sufficient parking for patients, client, visitors, employees, medical staff; site work; and landscaping.
- Provide for a possible relocation of the MRI Building.

2.3.3 Tier II: Master Plan Development Objectives

The County identified and prioritized the basic objectives that are important in achieving the proposed project goals for Tier II:

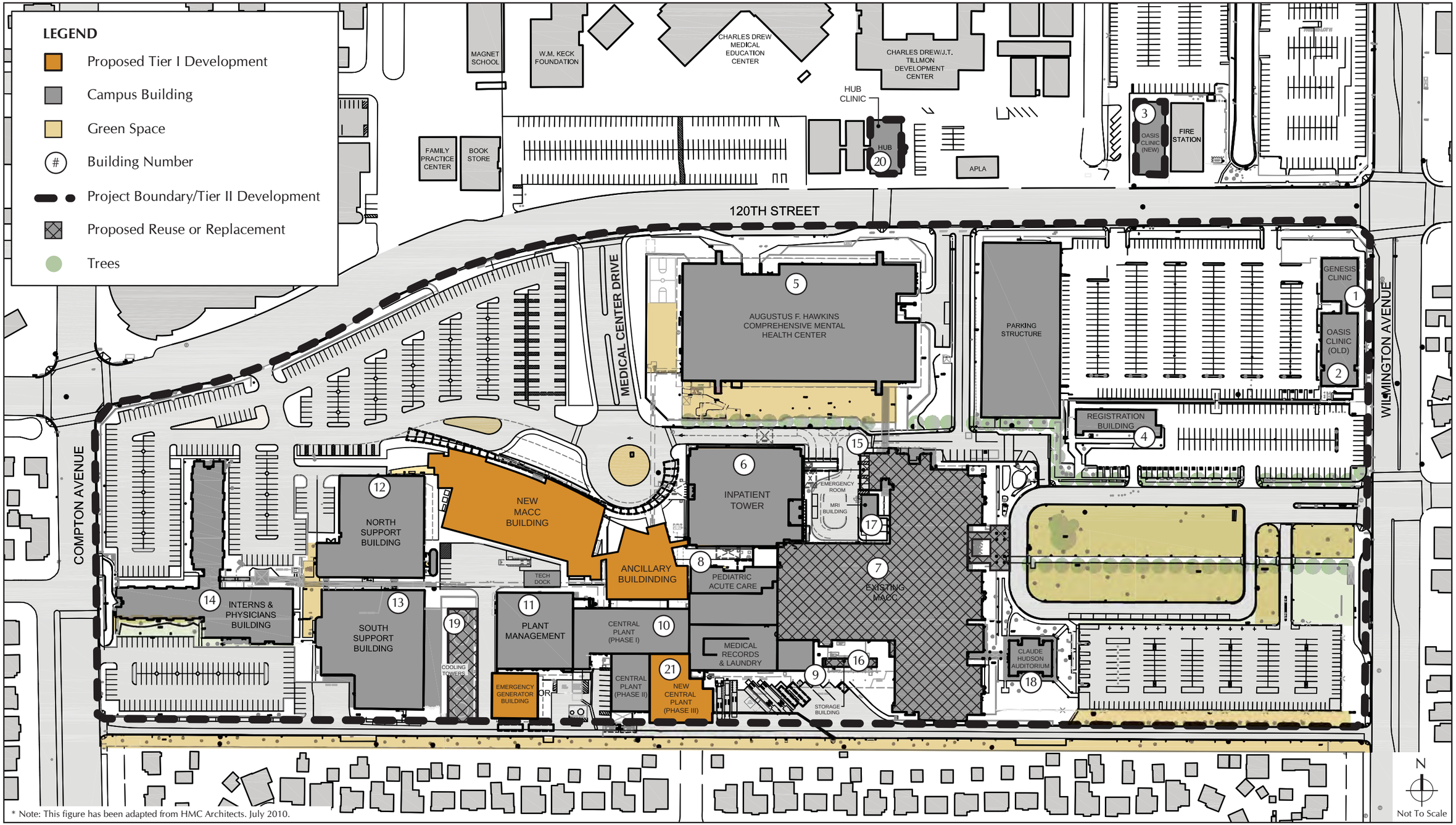
- Provide opportunities for development of up to 1,814,696 square feet of mixed use, including medical office, commercial, retail, residential, recreational, office space, and other development in support of the campus that are appurtenant to and

compatible with the primary land use of a community-based health program facility.

- Provide sufficient parking for mixed-use development.

2.4 PROPOSED PROJECT

The proposed project entails two tiers (Figure 2.4-1, *MLK Proposed Campus Plan*, and Table 2.4-1, *Proposed Campus Development Matrix*). Tier I would involve development of the new MACC Building and the Ancillary Building. Tier I would also include tenant improvements to the following existing buildings: North Support Building, South Support Building, and the Plant Management Building; site improvements; and potential relocation of the MRI Building.



* Note: This figure has been adapted from HMC Architects. July 2010.

FIGURE 2.4-1
MLK Proposed Campus Plan

TABLE 2.4-1
PROPOSED CAMPUS DEVELOPMENT MATRIX

	Building Name	Current Total Floor Area (SF)	Proposed Total Floor Area of Existing Campus to Remain in Tier II Buildings (SF)	Floor Area to Be Reused, Replaced, or Removed[a] (SF)	New Total Floor Area of Tier I Campus Buildings (SF)	Floors
1	Genesis Clinic	2,100	2,100	N/A	N/A	1
2	Oasis Clinic (old)	2,580	2,580	N/A	N/A	1
3	Oasis Clinic (new)	1,850	1,850	N/A	N/A	1
4	Registration Building	10,950	10,950	N/A	N/A	2
5	Augustus F. Hawkins Comprehensive Mental Health Center	226,818	226,818	N/A	N/A	3[b]
6	Inpatient Tower	187,676	187,676	N/A	N/A	5[b]
7	Existing MACC[c]	495,335	0	(495,335)	N/A	5[b]
8	Pediatric Acute Care	7,878	7,878	N/A	N/A	1
9	Medical Records and Laundry	26,355	26,355	N/A	N/A	1
10	Central Plant I and II	24,103	24,103	N/A	N/A	1
11	Plant Management	15,648	15,648	N/A	N/A	1
12	North Support Building	52,276	52,276	N/A	N/A	2
13	South Support Building	34,762	34,762	N/A	N/A	2
14	Interns and Physicians Building	124,391	124,391	N/A	N/A	6
15	Emergency Room	3,300	0	(3,300)	N/A	1
16	Storage Building	1,060	0	(1,060)	N/A	1
17	MRI Building	1,100	1,100	N/A	N/A	1
18	Claude Hudson Auditorium	3,922	3,922	N/A	N/A	1
19	Cooling Towers[d]	6,790	0	(6,790)	N/A	1
20	Hub Clinic	12,265	12,265	N/A	N/A	1
21	Storage Building[e]	2,533	0	(2,533)	N/A	1
A	New MACC	0		N/A	132,000	4
A	Ancillary Building	0		N/A	24,700	2
A	Emergency Generator	0		N/A	4,223	1
A	Central Plant III	0		N/A	9,409	1
	TOTAL	**1,243,692**	**734,674**	**509,018**	**170,332**	**N/A**

NOTES:

a. It is understood that the emergency room, storage buildings, cooling towers, and existing MACC would be vacated in Tier I and may be reused, replaced, or removed as part of Tier II of the proposed project. These buildings may be either (1) removed during Tier II or (2) reused, replaced, or removed in Tier II. In either case, the building space would not be operational as part of Tier I. Should these buildings be reused, replaced, or removed in Tier II, the floor area of the space would be included within the total Tier II potential development of 1,814,696 square feet. Thus, the total of all net new development floor area at build-out of the campus would not exceed 1,476,010 square feet. The new MACC Building, Ancillary Building, emergency generator space, and new central plant III are labeled "A" in Table 2.4-1, are proposed buildings.

b. These buildings also have basements, or a partial floor in the case of the Augustus F. Hawkins Comprehensive Mental Health Center.

c. This scenario takes into account the replacement of the MACC Building, which is the 'worst-case scenario for the proposed development. Should this structure be reused, 132,000 square feet for the MACC Building should be accounted for in both the proposed total floor area and proposed footprint of the campus buildings.

d. These structures would likely be removed following the reuse, replacement, or removal of the existing MACC Building.

e. This building is in the footprint of the Central Plant (Phase III) expansion but may just be incorporated during design and remain.

NOTES FOR TABLES 2.4-1, 2.4-2, and 2.4-3:

- The calculations assume that the campus would retain 10-percent open space through use of landscape for the purpose of aesthetic designs / beautification, noise barriers, storm water runoff reduction, air quality, and overall health and sustainability. The County Zoning Code specifications require a minimum of 10 percent open space).
- The calculations assume that a maximum of 40 percent of the campus would be reserved for the potential parking structures or parking lots.
- The calculations include a 2.5-story-average building-height limit, based on the existing structures. The County Zoning Code specifications require a 35' (3-story) height limit.
- There is no required setback for the development.
- The 100 residential units would be included in the approximately 1,814,696 square feet of new development.

Tier II of the proposed project would entail the reuse, replacement, or removal of the existing MACC Building (which will be vacant following construction of the new MACC Building in Tier I) and reuse, replacement, or removal of the following: Emergency Room, Storage Building, and Cooling Towers.[33] Tier II construction may entail additional master-planned mixed-use development, which may include the potential for medical offices, general offices, commercial and retail space, residential units, recreational areas, and other development that is appurtenant to and compatible with the primary land use, in support of the campus.

To establish a proposed program of development level for the mixed-use portion of Tier II that is described in Table 2.4-1 as the potential build-out, the currently undeveloped areas of the campus (undeveloped in this case includes parking lots and structures but not buildings) were calculated and adjustments were made for buildings to be reused, replaced, or removed and developed, to obtain a surface area from which to calculate allowable build-out (Table 2.4-2, *Proposed Tier II Campus Development Calculations*). A maximum build-out of this remaining area was calculated using maximum build-out criteria from the Los Angeles County Zoning Code restrictions applicable to the site. Initially, this maximum build-out number was in excess of 2 million square feet and included zoning code allowances of a maximum of three stories in building height and a minimum of 10 percent open space (i.e., areas without structures). To determine a more accurate level of development for Tier II, the following assumptions were added: (1) open space site-wide would remain a minimum of 10 percent in order to maintain some of the current character of the site as an open and landscaped campus; (2) the site area to be set aside for the potential development of an up to 100-unit residential component, parking structures or parking lots, and walkways would be a maximum of 40 percent of the entire site; and (3) although a maximum of three stories would be allowed for new buildings, an average height of 2.5 stories was assumed.[34] With these assumptions added in, the maximum programmed development for Tier II could consist of up to 1,814,696 square feet.

[33] However, the functions of these buildings would be substituted.

[34] An average building size of 2.5 was used although it is anticipated that the Tier II buildings would vary in size and may be taller than 2.5 stories.

TABLE 2.4-2
PROPOSED TIER II CAMPUS DEVELOPMENT CALCULATIONS

	Total Proposed Tier II Development (square feet)
TIER II DEVELOPMENT	
Total Campus Area (less the buildings retained)	1,344,219
Total Campus Area (less 10% open space)	1,209,797
Total Campus Area (less 40% potential parking)	725,878
Total Campus Area (multiplied by average building stories 2.5)	1,814,696
Total Campus Potential Build-out	**1,814,696**
Total Campus Area (38.36 acres)	***1,670,920***

Tier I of the proposed project will result in a decrease of the existing square feet, as the functions of several existing buildings would be removed. Tier II of the proposed project has the potential to result in a total floor area of up to 1,814,696 square feet (or a footprint of up to approximately 725,878 square feet) of new development. A summary of the proposed project development is provided in Table 2.4-3, *Proposed Project Development Summary*. As shown, given the net reduction in building floor area in Tier I, the net new development after completion of Tier I plus Tier II is 1,476,010 square feet of floor area.

TABLE 2.4-3
PROPOSED PROJECT DEVELOPMENT SUMMARY

	Summary	Square Feet
1	Existing floor area	1,243,692
2	Existing floor area proposed to remain	734,674
3	Floor area proposed to be reused, replaced, or removed[a]	(509,018)
4	Floor area proposed as new construction in Tier I	170,332
5	**Total net new Tier I development** *(Sum of lines 3 and 4)*	**(338,686)**
6	Potential new build-out Tier II	1,814, 696
7	**Total net new Tier I and Tier II** *(Sum of lines 5 and 6)*	**1,476,010**

NOTE:

a. This is the total amount of building floor area to be removed from operations, including reuse, replacement, or removal of buildings. See Table 2.4.1 for annotation of buildings that are being vacated, awaiting Tier II reuse, replacement, or removal. The vacation of the specified buildings in Tier I will result in a reduction of the existing floor area. The vacated buildings will be reused, replaced, or removed during Tier II of the proposed project.

Leadership in Energy and Environmental Design Elements

On January 16, 2007, the County of Los Angeles Board of Supervisors approved the Countywide Energy and Environmental Policy. The Countywide Energy and Environmental Policy consists of programs that are designed to institute energy conservation and environmental stewardship into all

County efforts.[35] As part of the Countywide Energy and Environmental Policy, the County has established requirements for capital construction. The County requires that all new County buildings (greater than 10,000 square feet) under the County's Capital Project Program, which includes capital improvement and development projects, shall be Leadership in Energy and Environmental Design (LEED) certified at the silver level.[36]

Development of the new MACC Building and the Ancillary Building under Tier I of the proposed project are currently registered with the U.S. Green Building Council under LEED for New Construction (LEED-NC).[37] The County will seek LEED silver certification for the MACC Building and the Ancillary Building.[38] In addition, any County buildings that are more than 10,000 square feet that are developed under Tier II of the proposed project will be required to seek a minimum LEED silver certification. The LEED program recognizes and promotes a project's success in five areas: (1) sustainable sites, (2) water efficiency, (3) energy and atmosphere efficiencies, (4) materials and resources, and (5) indoor environmental quality. In addition, the federal government has a program titled "Green Guide for Healthcare Construction" (GGHC), which is designed to help hospitals navigate through the LEED program. The proposed project would incorporate energy efficient and sustainable strategies throughout the construction, development, and operation of the proposed project.

The development of Tier I and Tier II of the proposed project would utilize and incorporate materials to ensure visual consistency and continuity at the proposed project site and within the surrounding area. The proposed project must adhere to the design goals presented in the campus planning and programming report that was prepared for the MLK Medical Center Campus by HMC Architects in 2009. The report stated that the proposed architecture should achieve the following:

- Respect the existing fabric of buildings;
- The selection of exterior material and architectural forms should make reference to the material palette of the existing campus while incorporating contemporary materials and building technologies to project the future vision of this campus;
- The juxtaposition and massing of the new buildings should be strategically located to allow visitors a pleasurable aesthetic experience; and
- The open spaces created in between the buildings are designed the variations in size, shape, and scale that are conducive to pedestrian travel through the campus.[39]

2.4.1 Tier I: Project Development

Tier I of the proposed project would entail the development of two new buildings: the new MACC Building and the Ancillary Building, tenant improvements in existing buildings, site improvements,

[35] County of Los Angeles. Accessed August 2010. "Energy and Environmental Efforts." Web site. Available at: http://green.lacounty.gov/green_buildings.asp

[36] County of Los Angeles. Accessed August 2010. "Energy and Environmental Efforts." Web site. Available at: http://green.lacounty.gov/green_buildings.asp

[37] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

[38] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

[39] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

and potential relocation of the MRI Building. Project-level environmental impact report (EIR) analysis will be provided for Tier I.

2.4.1.1 Multi-Service Ambulatory Care Center Building

The proposed MACC Building would be a four-story building consisting of approximately 132,000 square feet of floor area. This building would house the walk-in clinic, outpatient imaging, outpatient surgery, and various other outpatient clinics that are currently operating in the existing MACC. The proposed building would most likely be of structural steel construction. The gravity system of the building would consist of lightweight fill over metal decking supported by steel beams and columns. Similar to the proposed Ancillary Building, the lateral-force-resisting system of the MACC Building can be any one of the following: moment frames, braced frames, or a combination of the two. The lateral-force-resisting system, whether moment frames or braced frames, would be located along the perimeter of the building, which would accommodate maximum flexibility for planning and space layout. The foundation for the new building would likely be a cast-in-place drilled pile foundation system.

2.4.1.2 Ancillary Building

The proposed Ancillary Building would be a two-story structure consisting of approximately 24,700 square feet of floor area. This building would house the campus kitchen and cafeteria, and administrative offices. The building would be constructed to the east of the new MACC. A new pedestrian footbridge would be provided at the east end of the building for connection to the existing Inpatient Tower for the transportation of materials and supplies. The bridge would most likely be constructed of steel with a seismic joint at the Inpatient Tower.

The new building would most likely be structural steel construction. The gravity system of the building would consist of lightweight fill over metal decking supported by steel beams and columns. The lateral-force-resisting system for the building can be any one of the following: moment frames, braced frames, or a combination of the two. It is anticipated that the lateral-force-resisting system, whether moment frames or braced frames, would be located along the perimeter of the building, which would accommodate maximum flexibility for planning and space layout. The foundation for the new building would likely be a cast-in-place drilled pile foundation system.

2.4.1.3 Tenant Improvements

The tenant improvements would be performed in the North Support Building to provide space for the MACC administrative departments. The South Support Building would be reorganized to serve as the main warehouse for the MACC. The South Support Building may also serve as a central distribution center for other Los Angles County healthcare facilities in the area. Other tenant improvements would be performed in the Interns and Physicians and Plant Management Buildings for support functions to the MACC.

2.4.1.4 Site Improvements

The site work would consist of a new parking terrace, relocated entrance to the facility, new parking lots, re-striping of existing lots, and new landscaping at the entry of the new MACC and its surrounding area. A space for an emergency generator and a service yard with technical (tech) dock positions that connect mobile radiology equipment would also be provided.

In addition, site work would include improvements at 120th Street at the northern boundary of the proposed project site. These site improvements would entail: removing the existing cross walk and traffic signal at the new Oasis Clinic; adding a new crosswalk and traffic signal at the new campus (Medical Center Drive) entry; prohibiting curbside parking on both sides of 120th Street for a distance of approximately 300 feet east and 200 west of the new Medical Center Drive entrance;[40] adding a left-turn lane westbound at the new Medical Center Drive entrance; in order to remedy potential drainage defects, removing and replacing approximately 500 linear feet of street at Medical Center Drive entrance and/or constructing inlets and extending the public storm drain; repairing and/or replacing the curb, gutter, and sidewalk where necessary; and planting additional street trees and landscape.

Tier I would be expected to generate approximately 150 temporary construction jobs and no new permanent or operational staff positions as Tier I would only require existing staff to be shifted into the new Tier I facilities.

2.4.2 Tier II: Master Plan Development

Tier II of the proposed project would entail the development of a campus-wide Master Plan. It is anticipated that the development described in the Master Plan would seek to prepare the proposed project site for future mixed-use campus support development that would provide the health services necessary to respond to and address the needs of the community. Tier II would have the potential to build-out approximately 1,814,696 square feet of development on the proposed project site with mixed uses including medical office, commercial, retail, office space, recreation, and other development in support of the campus (Table 2.4.2-1, *Proposed Tier II Campus Development Matrix*). In addition, up to 100 residential units, to be developed at a multifamily density consistent with surrounding residential area multifamily development densities, are proposed in Tier II. Although the these buildings would be vacated as a component of Tier I, the Tier II components would entail the reuse, replacement, or removal of the existing MACC Building, Emergency Room, Storage Building, and Cooling Towers.

TABLE 2.4.2-1
PROPOSED TIER II CAMPUS DEVELOPMENT MATRIX

Land Use Description	Square Feet	Percentage of Tier II Development
Commercial / Retail	80,000	4.41
Residential	150,000	8.27
Medical Office	300,000	16.53
General Office	150,000	8.27
Additional Campus Support Buildings	1,134,696	62.53
TOTAL	**1,814,696**	**100.00**

NOTE:
Commercial/Retail assumes up to 4 spaces containing approximately 20,000 square feet multiplied by 2.5 stories; Residential assumes 100-unit building containing approximately 1,500 square feet per unit; Medical Office assumes the development of a 5-story building; General Office assumes the development of a 5-story building; Additional Campus Support Buildings assumes the rounded sum of a footprint of approximately 453,878 square feet multiplied by an average of 2.5 stories.

[40] This would remove approximately 30 curbside parking spaces on 120th Street. Adequate off-street parking is proposed to be provided on-site at the campus to account for the removal of these curbside parking spaces.

The Tier II components are conceptual at this time, and will therefore only be discussed in a programmatic level in the EIR, as permitted under CEQA. Once the detailed future development plans for Tier II components are prepared, consistent with the guidelines for programmatic EIRs under CEQA, the projects will be examined in light of the program EIR analysis, to determine whether additional environmental document(s) must be prepared.

In accordance with §15168 of the State CEQA Guidelines, the program-level analysis that is provided in this EIR document for Tier II of the proposed project is intended to be prepared for a series of actions that can be characterized as one large project, such as a master plan. Through a programmatic EIR, the County seeks to provide the public, responsible agencies, and interested parties an opportunity for a more exhaustive consideration of the Tier II effects and alternative than would be practical in an EIR for each individual action; furthermore, the County can consider broad program-wide mitigation measures at an early time when there is greater flexibility to deal with basic problems or cumulative impacts. It is understood, however, that subsequent activities described within Tier II of the proposed project must be evaluated in light of the programmatic EIR to determine whether additional environmental document(s) must be prepared.

Although some variation in the distribution of these uses (i.e., percentage of the total) may occur when the project is implemented, the data in Table 2.4.2-1 present a reasonable projection at this time of the land use distribution for the purposes of environmental impact assessment.

Tier II development would be expected to generate approximately 150 temporary construction jobs that would vary according to the development and will be determined in the future Master Plan. Tier II also has the potential to result in a range of new permanent or operational staff positions. The County has estimated a conservative of the number of 100 jobs that could be associated with Tier II of the proposed project.[41]

2.4.3 National Environmental Policy Act Compliance

Funding for the proposed project has been solicited by the County through a variety of sources. One way in which the County intends to support a portion of the development on the proposed project's campus is by selling bond that have been made available through the American Recovery and Reinvestment Act of 2009 (ARRA). ARRA was signed into law by President Barack Obama on February 17, 2009. According to the U.S. Department of Treasury,

> It is an unprecedented effort to jumpstart the [United States] economy, create or save millions of jobs, and put a down payment on addressing long-neglected challenges so our country can thrive in the 21st century. The Act is an extraordinary response to a crisis unlike any since the Great Depression, and includes measures to modernize our nation's infrastructure, enhance energy independence, expand

[41] This range is a conservative assessment based upon coordination with the County. These numbers are based solely upon estimates regarding what could occur as part of this project and do not reflect known or actual trends although labor fore casts related completed by the U.S. Bureau of Labor Statistics (BLS) were reviewed. The U.S. BLS, November 2009 Monthly Labor Review, which is available at http://www.bls.gov/opub/mlr/2009/11/mlr200911.pdf, projected the following for the year 2018: jobs in the health care and service assistance field will account for approximately 12% of the available non-farm jobs; retail and trade would account for 10%; professional business would account for 14%; and leisure and hospitality would account for approximately 9% of the available non-farm jobs in the U.S. in 2018.

educational opportunities, preserve and improve affordable health care, provide tax relief, and protect those in greatest need.[42]

The County has determined that the proposed project is not subject to review under federal compliance standards of the Nation Environmental Policy Act (NEPA) as a result of the fact that the funds that were provided through ARRA were specifically distributed to address health and other provisions under ARRA which is not an "act" that would require that NEPA review.[43,44,45]

2.4.4 Construction Scenario

The information contained in the construction scenario for reasonably anticipated construction related activity for the proposed project tiers was developed based upon assessments completed for projects of a comparable size and was used in the assessment of potential construction impacts to air quality, ambient noise levels, and traffic and circulation.

The construction of the proposed project would comply with all applicable code and ordinance requirements for construction, access, water main, fire flows, and fire hydrants. Specific fire and line safety requirements for the construction of the proposed project would be reviewed for approval during each building's fire plan check. It is understood that there may be additional fire and other safety requirements that result from the plan check.

It is anticipated that the site Emergency Response and Evacuation plans will be updated for both Tier I and Tier II of the proposed project as appropriate and that these plans will address all campus development, as each building is completed.

It is also understood that communication with the County Fire Department, Sheriff's Department, and other emergency response agencies will continue throughout the development of the both tiers of the proposed project. It is further understood that the County of Los Angeles would coordinate with the respective service agencies for Tier II of the proposed project to review the specific proposed development during the planning phase of the proposed project in order to confirm whether Tier II of the proposed project adequately meets the requirements of the respective service provider.

2.4.4.1 Tier I Construction Scenario

Tier I of the proposed project—which consists of the construction of the new MACC Building, the Ancillary Building, tenant improvements, site improvements, and potential relocation of the MRI Building—would require approximately 37 months to complete (March 2011 to April 2014). Construction at the proposed project site is anticipated to be in accordance with all federal, state,

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[42] U.S. Department of Treasury. Accessed 5 April 2010. *The American Recovery and Reinvestment Act of 2009 (Recovery Act)*. Available at: http://www.ustreas.gov/recovery/

[43] Becker, Arto C., and Russell Miller, Bond Counsel. 7 April 2010. *Memorandum: Various Questions Regarding the American Recovery and Reinvestment Act of 2009*. Los Angeles, CA.

[44] Higdon, Matthew, Council on Environmental Quality. 7 April 2010. Telephone correspondence with Marlise Fratinardo, Sapphos Environmental, Inc., Pasadena, CA.

[45] Ward, Kristin, Management and Program Analyst, U.S. Department of Treasury. 7 April 2010. Telephone correspondence with Marlise Fratinardo, Sapphos Environmental, Inc., Pasadena, CA.

regional, and County regulations, including the National Pollution Discharge Elimination System[46] and the County General Plan.[47]

It is anticipated that construction related to Tier I for the proposed project may require the type of equipment listed below in Table 2.4.4.1-1, *Anticipated Construction Equipment*. The information contained in Table 2.4.4.1-1 will be used in the assessment of potential construction impacts to air quality, ambient noise levels, and traffic and circulation for Tier I of the proposed project. This information was prepared in consultation with the County of Los Angeles Department of Public Works, HMC Architects, and representatives from the American Institute of Architects.

TABLE 2.4.4.1-1
ANTICIPATED CONSTRUCTION EQUIPMENT

Approximate Quantity	Type of Equipment or Vehicle	Approximate Duration of On-site Construction Activity (in months)
2	Man lift	3
4	Pickup truck	8
2	Hand compactor	5
2	Crane	3
1	Concrete mixer	4
1	Backhoe	3
40–60	Crew members	8
50	Crew vehicles (maximum)	8
1	Pile Driver	6
1	Large Bulldozer	3
2	Dozer	3
1	Front-end loader	1
1	Water truck	2
1	Grader	1
5	Dump truck	6
16	Concrete mix truck	9
1	Roller	1
3	Fork lift / grade all	3

Site preparation and construction of the proposed project would be in accordance with all federal, state, and County building codes. Daily construction activities would be subject to County noise regulations. All construction-related activities would be scheduled in compliance with the County Noise Ordinance, which prohibits construction activities and operation of construction equipment between the hours of 8:00 p.m. and 7:00 a.m., Monday through Friday, or at any time on Sunday or holidays. Work conducted on Saturdays would commence at 7:00 a.m. and cease no later than 5:00 p.m. Noise levels exceeding 65 dBA (decibels, A-weighted sound levels) for single-family residences and 70 dBA for multifamily residences during construction hours are prohibited.

The construction contractor would ensure that source-reduction techniques and the development of recycling programs during construction and operation of the proposed project are considered

[46] U.S. Environmental Protection Agency. 2009. *National Pollution Discharge Elimination System*. Available at: http://cfpub.epa.gov/npdes/

[47] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

and implemented whenever possible.[48] In addition, employee vehicles, construction equipment and vehicles, and storage and materials used throughout the proposed project site would be located in a designated staging area in an effort to minimize impacts to the site, pedestrians, and medical center employee or visitor traffic.

It is anticipated that there would be grading activities associated with the development of Tier I of the proposed project. It is anticipated that the approximately 40,000 cubic yards of material would be exported from the site during construction of the proposed project. It is further anticipated that excavation may exceed 20 feet but would not be expected to be greater than 45 feet deep. It is anticipated that a geotechnical engineer would be available for observation and testing of the earthwork-related tasks to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. Any unanticipated adverse conditions encountered would be evaluated by the proposed project engineering geologist and the soil engineer.[49] The existing access roads to and the streets surrounding the proposed project site would be used to transport import, export, and other construction related materials to and from the proposed project site. Specifically, construction-related vehicles would access the proposed project site from the north and south of the campus.

North Haul Route

The north hauling route would consist of the following: a vehicle would exit the I-105 at Wilmington Avenue; travel south on Wilmington Avenue to East 120th Street; turn right on East 120th Street; and head west to the north parking lot entrance. A vehicle would exit the site at the north parking lot and turn right; travel east on 120th Street; turn left on Wilmington Avenue; and travel north to the I-105.

South Haul Route

The south hauling route would consist of the following: a vehicle would exit the 1-105 at Wilmington Avenue, travel south to the alley at the southern border of the campus, and turn right onto the campus. A vehicle would exit the site by heading west towards Compton Avenue, turn right and travel north on Compton Avenue, turn right on East 120th Street, head east toward Wilmington Avenue, turn left on Wilmington Avenue, and travel north to the I-105.

Further analysis regarding the structural integrity of the roads along the hauling routes may be required and reviewed by the County Department of Public Works. In the event that the designated roads described in the hauling routes do not meet the structural integrity required for the purposes of the proposed project, it is possible that reconstruction of these roadways would be required to increase the structural integrity, to handle increased loading.

The construction contractor would be required to incorporate best management practices (BMPs) consistent with the guidelines provided in the California Storm Water Best Management Practice Handbooks: Construction.[50] Should the construction period continue into the rainy season,

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[48] *Los Angeles County Code*. Title 12, "Environmental Protection," Chapter 20.87.08.060, "Approval of Recycling and Reuse Plan." Available at: http://ordlink.com/codes/lacounty/index.htm

[49] URS. 14 May 2009. *Geotechnical Investigation*. Los Angeles, CA.

[50] California Stormwater Quality Association. 2009. *California Stormwater Best Management Practice Handbooks: Construction*. Menlo Park, CA. Available at: http://www.cabmphandbooks.com/Documents/Construction/Section_3.pdf

supplemental erosion measures would need to be implemented, including, but not limited to, the following:

- Mulching
- Geotextiles and mats
- Earth dikes
- Temporary drains and gullies
- Silt fence
- Straw-bale barriers
- Sandbag barrier
- Brush or rock filter
- Sediment trap

The anticipated construction period would begin in March 2011 and conclude in April 2014. BMPs to control surface runoff and soil erosion would be required for construction taking place during rainy periods.

Construction equipment would be turned off when not in use. The construction contractor would ensure that all construction and grading equipment is properly maintained. All vehicles and compressors would utilize exhaust mufflers and engine enclosure covers (as designed by the manufacturer) at all times. It is currently anticipated an average of 150 construction workers would be on site at any given time during the construction of the proposed project.

Construction-related ingress and egress to the proposed project site would occur primarily off East 120th Street to the north or Wilmington Avenue to the east. Construction-related traffic delays and other nuisance traffic would be anticipated on the street identified above in the haul routes, as well as on the streets surrounding the campus as a result of the proposed project. The County would maintain the roads as necessary throughout the operation and maintenance of the proposed project. Furthermore, it is understood that all construction-related plans, including, but not limited to, hauling routes, construction scheduling (regarding deliveries of material, import/export, use of equipment, or other construction-related scheduling), and access to the proposed project would be subject to the review and approval of the County Department of Public Works, Traffic and Lighting Division and all other relevant agencies. Potential impacts related to construction, including potential impacts to the roadways surrounding the proposed project site are further analyzed in this EIR.

2.4.4.2 Tier II Construction Scenario

The Tier II of the proposed project consists of a campus-wide Master Plan and up to 1,814,696 square feet of development on the proposed project site. The potential construction scenario for Tier II may be envisioned as a multiphase process to be completed concurrently with Tier I. The construction scenario is to develop Tier II within an approximately 10-year timeframe, between 2010 and 2020. For the purposes of the analysis contained in this document, a build-out year of 2020 has been assumed for Tier II of the proposed project. This analysis approach of the construction scenario has been developed based on an aggressive scenario (which allows the proposed project site to be developed to the maximum extent possible) to allow the consideration of a reasonable worst-case environmental impacts scenario, which encompasses the maximum anticipated impacts of the proposed project, in the event that the County chooses to complete up to 1,814,696 square feet of development.

The type and quantity of equipment that would potentially be used in construction of Tier II would vary for each component. However, for the purposes of this analysis, it is anticipated that development of Tier II would require multiple phases that would utilize equipment that is comparable to the equipment described in Table 2.4.4.1-1 for each phase.

Site preparation and construction of the proposed project would be in accordance with all federal, state, and County building codes.

As with Tier I of the proposed project, the construction contractor would ensure that source-reduction techniques and the development of recycling programs during construction and operation of the proposed project are considered and implemented whenever possible.[51] The construction contractor would be required to incorporate BMPs consistent with the guidelines provided in the California Storm Water Best Management Practice Handbooks: Construction.[52]

BMPs to control surface runoff and soil erosion would be required for construction taking place during rainy periods.

Any construction equipment used during the potential development of Tier II would be turned off when not in use to reduce idling to the maximum extent possible. The construction contractor would ensure that all construction and grading equipment is properly maintained. All vehicles and compressors would utilize exhaust mufflers and engine enclosure covers (as designed by the manufacturer) at all times. It is currently anticipated that on average, up to 400 construction workers would be on site at any given time during the construction of the Tier II portion of the proposed project. It is also anticipated that approximately 60 County project and construction management staff would be at the site during Tier II construction. However, this number could vary as a result of the type an amount of work being completed on the site throughout the tier.

Construction-related ingress and egress to the proposed project site would occur primarily off East 120th Street to the north or Wilmington Avenue to the east.

2.5 INTENDED USES OF THE EIR

The County of Los Angeles is the lead agency for the proposed project. The County of Los Angeles Board of Supervisors will be requested to consider certification of the EIR and is authorized to render a decision on the approval of the proposed project.

Specific project elements may be subject to additional approvals, which include, but are not limited to, those described in Table 2.5-1, *Required Approvals*. The anticipated permits, approvals, and licenses would be required for development of the proposed project and specifies the agency(ies) and programs responsible for issuing each approval.

[51] *Los Angeles County Code*. Title 12, "Environmental Protection," Chapter 20.87.08.060, "Approval of Recycling and Reuse Plan." Available at: http://ordlink.com/codes/lacounty/index.htm

[52] California Stormwater Quality Association. 2009. *California Stormwater Best Management Practice Handbooks: Construction*. Menlo Park, CA. Available at: http://www.cabmphandbooks.com/Documents/Construction/Section_3.pdf

TABLE 2.5-1
REQUIRED APPROVALS

Permit / Approval / License Title	Agency/Program
Clinic License	• County of Los Angeles Department of Health Services, Health Facilities Inspection Division • State of California Department of Health Services, Licensing, and Certification Division • California Department of Public Health Licensing and Certification Program
Asbestos and Lead-Based Paint Abatement	• U.S. Environmental Protection Agency
Asbestos Abatement Notification / Asbestos Worker Notification	• California EPA, Department of Toxic Substances Control • California Division of Occupational Safety and Health • South Coast Air Quality Management District
Building, Grading, Excavation, Encroachment Permit	• County of Los Angeles Department of Regional Planning • County of Los Angeles Department of Public Works
Construction Permit	• County of Los Angeles Department of Regional Planning • County of Los Angeles Department of Public Works • County of Los Angeles Fire Department • Office of Statewide Health Planning and Development
Conditional Use Permit	• County of Los Angeles Department of Regional Planning • County of Los Angeles Department of Public Works • Office of Statewide Health Planning and Development
Demolition Permit	• County of Los Angeles Department of Public Works • California Division of Occupational Safety and Health • Office of Statewide Health Planning and Development
Abatement, Notification, Grading, and Operating Permit	• South Coast Air Quality Management District
NPDES Permit / SUSMP / SWPPP	• County of Los Angeles Department of Public Works
Notification (Cultural Resources)	• California Office of Historic Preservation
Transportation permits, encroachment permit, parking, transportation permit for the use of oversized vehicles, and traffic modifications on state highways	• State of California Department of Transportation • Metropolitan Transportation Authority (MTA) • County of Los Angeles Department of Regional Planning
Campus Plan Approval	• Office of Statewide Health Planning and Development • County of Los Angeles Department of Public Works • County of Los Angeles, Board of Supervisors

2.6 RELATED PROJECTS

The area surrounding the proposed project site was examined in order to determine whether there are currently any projects in progress or proposed for the future that could potentially add to the impacts of the proposed project, creating cumulative significant impacts.

It was determined that there are at least forty-two (42) projects that could affect the cumulative impacts analysis of the proposed project that are anticipated to be initiated within the construction period for both tiers of the proposed project and would occur within an approximate 3-mile radius of the proposed project site (Table 2.6-1, *List of Related Projects,* and Figure 2.6-1, *Related Project Locations*).

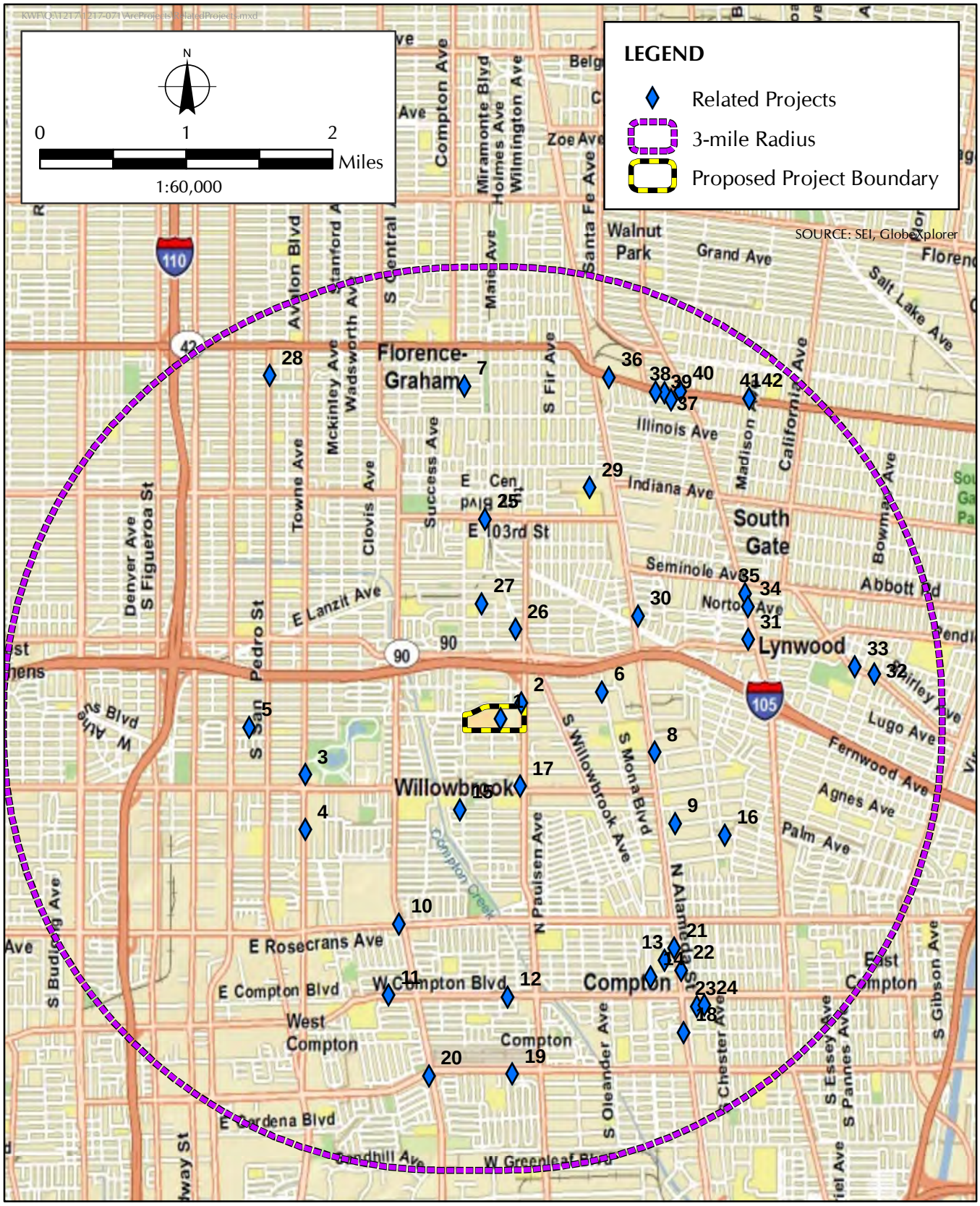

FIGURE 2.6-1

Related Project Locations

TABLE 2.6-1
LIST OF RELATED PROJECTS[a]

#	Related / Cumulative Project	Location	Description	Distance from Site (miles)
County of Los Angeles[b]				
1	MLK Campus Improvements	12021 South Wilmington Avenue	Hospital [h]; 172,591 square feet (sf) and 120 beds	0
2	South Public Health Clinic	11839 Wilmington Avenue	Health Clinic; 48,000 sf	0.02
3	Charter High School	12628 Avalon Boulevard	High School; 32,000 sf	1.2
4	Avalon II Apartment Project[c]	13218 Avalon Boulevard	Apartments; 55 units	1.2
5	Townhouses	East 121st Street between Main Street and San Pedro Street	Townhouses; 14 units	1.5
6	Single-family Houses	2354 East 118th Street	Single-family Residences; 4 units	0.6
7	South Region Elementary School No. 7	1536 East 89th Street	Elementary School; 950 students	2.2
City of Comptond				
8	Recycle Center	3100 North Alameda Street	Recycling Center; 43,350 sf	0.9
9	Warehouse	409 East Euclid Avenue	Warehouse; 10,874 sf	1.2
10	Commercial	2215 West Rosecrans Avenue	Commercial; 25,000 sf	1.4
11	Apartment	2301-2307 West Compton boulevard	Apartments; 4 units	1.9
12	Townhouses	930 West Compton Boulevard	Townhouses; 41 units	1.8
13	Mixed-Use	509 North Tamarind Avenue	Condominiums; 136 units Retail; 4,000 sf	1.9
14	Senior Center	Tamarind Avenue and Palmer Street	Senior Center; 4 units	2.0
15	Residential	1409 West 130th Street	Single-Family Residential; 4 units	0.5
16	Townhouses	809 East Pine	Townhouses; 8 units	1.5
17	Residential	2709 North Wilmington Avenue	Single-Family Residential; 4 units	0.4
18	Townhouses	501 South Alameda Street	Townhouses; 28 units	2.3
19	Retail	909 South Central Avenue	Retail; 6,500 sf	2.4
20	Mixed-Use	950 West Alondra Boulevard	Townhouses; 28 units Church; 3,000 sf	2.3
21	Senior Housing	Northwest corner of Alameda Street and Palmer Street	Senior Housing; 200 units	2.0
22	Condominium	Southwest corner of Alameda Street and Elm Street	Condominiums; 186 units	1.8
23	Mixed-Use	Northwest corner of Tamarind Avenue and Palmer Street	Live/work Units; 12 units Apartments; 6 units Retail; 11,500 sf	1.9
24	Apartment Complex	202 South Rose Avenue	Apartments; 4 units	2.3
25	Apartment Complex	205 North Willow Avenue	Apartments; 4 units	2.1

TABLE 2.6-1
LIST OF RELATED PROJECTS[a], Continued

#	Related / Cumulative Project	Location	Description	Distance from Site (miles)
City of Los Angeles[e]				
26	Movie Theater	10341 Graham Avenue	Movie theater w/ matinee; 1,040 seats Education Center; 12,000 sf	1.3
27	High School	11300 Monitor Avenue	Highs School; 500 seats	0.5
28	Amino Watts No. 2 at Flourny	1630 East 111th Street	High School; 125 seats	0.6
29	South Region High School No. 12	8800 South San Pedro Street	High School; 2,025 seats	2.6
30	Jordan Downs Redevelopment Project	97th Street to the north, Alameda Street to the east, 103rd Street to the south, and Grape Street to the west	Mixed Use and 1,800 units	1.3
City of Lynwood[f]				
31	Warehouse[f]	11298 Alameda Street	Warehouse; 7,200 sf	0.9
32	Oakwood Plaza	3211 Oakwood Avenue	Retail; 14,800 sf	1.6
33	Retail Building	3801-3831 Martin Luther King, Jr. Boulevard	Retail; 15, 90 sf	2.3
34	Commercial Building	3791 Martin Luther King, Jr. Boulevard	Office; 4,140 sf	2.4
35	Habitat for Humanity	4237 Imperial Highway	Condominiums; 10 units	3.0
36	Retail Building	10838 Long Beach Boulevard	Retail; 5,300 sf	1.7
City of South Gate[g]				
37	Calden Avenue Condominiums	Southwest corner of Firestone Boulevard and Calden Avenue	Mini-warehouse; 100,000 sf Condominiums; 107 units	2.3
38	Firestone Village Mixed-Use Project	Firestone boulevard between Long Beach Boulevard and Santa Fe Avenue	Shopping Center; 18,090 sf Condominiums; 47 units	2.3
39	Villa Santa Rosa Mixed-Use Project	South Firestone Boulevard between Long Beach Boulevard and Santa Fe Avenue	Shopping Center; 8,642 sf Office; 9,109 sf Condominiums; 56units	2.3
40	LAUSD Elementary School No. 9	2777 Willow Place	Elementary School; 650 seats	2.3
41	Bank	Northwest corner of Firestone and Long Beach Boulevard	Bank; 8,000 sf	2.4
42	Food Market	Northwest corner of Firestone and State Street	Shopping Center; 20,000 sf	2.6

SOURCES:

a. Raju Associates, Inc. November 2009. The traffic study measure distances to these related project boundaries (at the street) and as measured distances may be slightly smaller than those presented here.
b. County of Los Angeles Regional Planning. 2010. Web site. Available at: http://planning.co.la.ca.us/
c. Raju Associate, Inc. Associates. June 2006. "Traffic Study for the Avalon II Affordable Housing Residential Project."
d. City of Compton Planning Department. 2010. Web site. Available at: http://www.comptoncity.org/
e. City of Los Angeles Department of Transportation. 2010. Web site. Available at: http://ladot.lacity.org/
f. City of Lynwood Planning Department. 2010. Web site. Available at: http://www.lynwood.ca.us/
g. City of Southgate Planning Department. 2010. Web site. Available at: http://www.cityofsouthgate.org/

NOTE:

h. This includes the improvements and minor renovation as described in Section 2.2.1, Background, of the project description.

2.7 PROJECT ALTERNATIVES

During the initial design phases of the proposed project, several alternatives have been analyzed. The proposed project represents a combination of elements from the alternatives listed below. The No Project Alternative required under CEQA, as well as five (5) other alternatives, have been carried forward for detailed analysis in this EIR (refer to Section 4.0 for a full discussion on alternatives).

- No Project Alternative
- Alternative 1: Reduced Project Size Alternative (900,000 square foot Tier II)
- Alternative 2: Re-opening the Existing MACC Alternative
- Alternative 3: Public Transportation Focused Alternative
- Alternative 4: 500 beds (in Tier I) Alternative
- Alternative 5: No Tier II Alternative

SECTION 3.0
EXISTING CONDITIONS, IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

This section of the Environmental Impact Report (EIR) evaluates the potential of the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) to result in significant impacts to the environment as a result of construction, operation, and maintenance of the proposed project. This section of the EIR provides a full scope of environmental analysis in conformance with the State California Environmental Quality Act Guidelines (State CEQA Guidelines).

The Initial Study for the proposed project determined that there was no evidence that the proposed project would cause significant environmental effects related to four environmental resources: agriculture and forest resources, biological resources, land use and planning, and mineral resources.[1] The Initial Study identified the potential for the proposed project to result in 13 significant impacts to environmental resources warranting further analysis: aesthetics, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. As a result of the detailed evaluation contained in this EIR, it has been determined that neither Tier I nor Tier II of the proposed project would result in potentially significant impacts to population and housing, public services, and recreation.

TIER I

The analysis undertaken in support of Tier I of this EIR has determined that impacts to aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and transportation and traffic can be mitigated to below the level of significance. Construction-related impacts to greenhouse gas emissions and noise, may remain significant following the implementation of mitigation measures.

TIER II

The analysis undertaken in support of Tier II of this EIR has determined that impacts to aesthetics, geology and soils, hazards and hazardous materials, hydrology and water quality, transportation and traffic, and utilities and service systems can be mitigated to below the level of significance. Construction-related impacts to air quality, cultural resources, greenhouse gas emissions, and noise may remain significant following the implementation of mitigation measures.

Each section provides the regulatory framework, existing conditions, thresholds of significance, impact analysis, mitigation measures for significant impacts, level of significance after mitigation, and cumulative impact analysis. The applicable federal, state, regional, county, and local statutes and regulations that govern individual environmental resources that must be considered by the County of Los Angeles Board of Supervisors in the decision-making process are included in the regulatory framework described for each environmental resource. The existing conditions portion of the analysis has been prepared in accordance with the State CEQA Guidelines and includes a description of the environment in the vicinity of the proposed project as it currently exists, from both a local and regional perspective. The existing conditions are described based on literature review and archived resources,

[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project, Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

agency coordination, and field inspections. Significance thresholds were established in accordance with Appendix G of the State CEQA Guidelines. The potential for cumulative impacts was considered in relation to 40 related projects identified as a result of scoping, agency consulting, and site inspections (Table 2.6-1, *List of Related Projects*, in Section 2, *Project Description*). Mitigation measures were derived from public and agency input and state-of-the-practice engineering methods. The level of significance after mitigation was evaluated in accordance with the thresholds of significance and the effectiveness of the proposed mitigations to reduce potentially significant impacts to below the significance threshold. The impact analysis contained in this environmental document is based solely on the implementation of the proposed project as described in Section 2, *Project Description*.

The Tier II components of the proposed project are conceptual at this time, and have therefore been discussed in a programmatic level in the EIR, as permitted under §15168 of State CEQA Guidelines. Once the detailed future development plans for Tier II components are known, consistent with the guidelines for programmatic EIRs under CEQA, the projects will be examined in light of the program EIR analysis, to determine whether additional environmental document(s) (including additional or different mitigation measures that are specific to the Tier II project elements) must be prepared.

3.1 AESTHETICS

As a result of the Initial Study,[1] the County of Los Angeles (County) has determined that the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in impacts to aesthetic resources. Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts from the aesthetic resources.

This analysis consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the proposed project area, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential for impacts to aesthetic resources has been analyzed in accordance with Appendix G of the State California Environmental Quality Act (CEQA) Guidelines[2] and the methodologies and policies provided by the County General Plan.[3] In addition, the proposed project's potential for impacts to aesthetic (visual) resources has also been evaluated in accordance with the methodology provided by the California Department of Transportation's (Caltrans) "Scenic Highway System" designations,[4] along with previously prepared and other relevant documentation (see Appendix B, *Aesthetics Analysis Technical Report*) regarding the visual character of the proposed project site including light and glare, shade and shadow, and site reconnaissance.

3.1.1 Regulatory Framework

Federal

Section 4(f) of the U.S. Department of Transportation Act of 1966

The U.S. Department of Transportation Act of 1966, Section 4(f), "Protection of Publicly Owned Park, Recreation Area, Wildlife or Waterfowl Refuge, or Land from Historic Sites," was established to provide certain protections to publicly owned parks, recreation areas, wildlife and waterfowl refuges, and land from historic sites of national, state, or local significance. Section 4(f) requires that the federal agency must show that there are no feasible or prudent alternatives to the use of these areas.[5]

The proposed project would not result in the conversion of existing publicly owned park areas. The County zoning designation for all project parcels (APNs 6140-028-902, 6140-028-900, 6140-028-907, and 6140-028-903) is Neighborhood Commercial (C-2; Neighborhood Business Zone). This zoning designation is established to identify community-related commercial uses and permits the following uses: drugstores, medical clinics (including laboratories), professional or business office

[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

[2] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[3] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[4] California Department of Transportation. 5 October 2007. *Eligible (E) and Officially Designated (OD) Routes*. Available at: http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm

[5] U.S. Department of Transportation. 1966. U.S. Department of Transportation Act, Section 4(f). Available at: http://www.cr.nps.gov/local-law/FHPL_DOTAct.pdf

space, parking lots and buildings, and hospital equipment and supply rentals.[6] The Martin Luther King, Jr. Medical Center Campus began operations in 1972 following the 1965 Watts Civil Unrest/Riots as a response to the community healthcare needs.[7] The proposed project would meet the community needs for quality healthcare and is not intended to alter the public use or historic relevance of the site. Therefore, no further analysis regarding project compliance with the U.S. Department of Transportation Act would be required.

National Trails System Act

The National Trails System Act seeks to preserve scenic and natural qualities along trails, and recognizes the rights of private landowners and provides that "full consideration shall be given to minimizing the adverse effects upon the adjacent landowner or user and his operation" in the development and use of a trail.[8] The National Trails System Act assigns management responsibility for trails to various federal resource agencies, depending on which agency holds jurisdiction over the land on which the trail is located in a given area.

The Juan Bautista de Anza National Historic Trail was created under the 1968 National Trails System Act to provide for outdoor recreation opportunities and the conservation of significant scenic, historic, natural, or cultural qualities. At its closest point, the Juan Bautista de Anza National Historic Trail is located approximately 9.2 miles to the north of the property see Section 3.11, *Recreation*, for additional details.

State

California Scenic Highway Program

California's Scenic Highway Program preserves and protects scenic highway corridors from changes that would diminish their aesthetic value. Caltrans designates scenic highway corridors and establishes those highways that are eligible for the program. The program was created in 1963 with the enactment of the State Scenic Highways Law.[9] The street and highway code includes a list of those highways that are either eligible for designation or are designated. There are no officially designated State scenic highways or eligible State scenic highways within the vicinity of the proposed project site.

The nearest recognized highway to the proposed project is California State Route 110 (SR 110), which is located west of the proposed project site boundary. The Caltrans Scenic Highway System has identified a portion of SR 110 as a "Historic Parkway" (sometime referred to as a Scenic Byway), which is distinct from an official scenic designation.[10] Assembly Bill (AB 27) designated SR 110 as a California Historic Parkway, a new category of road within the Scenic Highway system.

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[6] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[7] County of Los Angeles. Accessed 9 October 2009. *Los Angeles County Health Services, MLK-MACC*. Available at: *http://www.ladhs.org/wps/portal/KingHomepage*

[8] U.S. Department of Interior, National Parks Service. Amended 2004. National Trails System Act. Available at: http://www.nps.gov/nts/legislation.html

[9] *California Codes*. Streets and Highways Code, Section 260–284.

[10] California Department of Transportation. 1 May 2006. The California Scenic Highway System: A List of Eligible (E) and Officially Designated (OD) Routes (by Route). Available at: http://www.dot.ca.gov/hq/LandArch/scenic_highways/scenic_hwy.htm

This stimulated efforts to pursue preservation and rehabilitation of the historic roadway.[11] A Historic Parkway designation was given to a portion of SR 110; this designation marked an important transitional moment in the history of American freeway engineering and transportation. SR 110 is the first freeway—a grade-separated, limited-access, high-speed divided road—in the western United States. SR 110 is identified as a Historic Parkway between milepost 25.7 and milepost 31.9 in Los Angeles.[12] While SR 110 is located approximately 2 miles from the proposed project site, the historic parkway area is not located near the campus. The scenic designation begins near Glenarm Street in the Pasadena area, to US 101 in Los Angeles.[13] The designated portion of SR 110 route passes through Chinatown and Elysian Park, and the Cypress Park neighborhood in Downtown Los Angeles, which is located approximately 14-miles away from the proposed project site.

Regional

Los Angeles County General Plan

The County General Plan (General Plan) provides a framework for coordinating short- and medium-range actions designed to meet public needs, address critical public issues and guide development and growth within the County. It sets forth guidelines for how the County should allocate its resources related to overall land use direction and development in the County. Moreover, the County General Plan serves as a document that provides decision-makers with a policy framework to guide specific, incremental decisions in support of achieving the Plan's stated goals and objectives, and to ensure the effective use of public resources.

The County General Plan land use designation for the proposed project is Public and Semipublic Facilities (P). As described in the County General Plan, the Public and Semipublic land use designation provides for activities by public and quasi-public entities and allows for the establishment of facilities, infrastructure, and their related operations in these areas that are public or semipublic in nature, including hospitals.

The County General Plan includes 10 elements. Two specific elements, the Conservation and Open Space element and the Scenic Highway element, provide policies related to scenic views and vistas and therefore were considered for this analysis.

<u>County General Plan Conservation and Open Space Element</u>

The Conservation and Open Space element provides goals, policies, and action items related to the open space–related resources of the County. These resources include land and water areas devoted to recreation, scenic beauty, conservation and use of natural resources, agriculture, and mineral production. The element's policies are based on the need to conserve natural amenities, protect against natural hazards, and meet the public's desire for open space experiences. Open space refers to both public and private lands and waters that are preserved for long-term open dedication and recreational uses. Existing open spaces in the County include national forests, state, county, city parks and nature preserves. Open space can also include recreational uses such as golf

[11] California Department of Transportation. Updated 17 April 2008. Fact Sheet: Historic Arroyo Seco Parkway. Available at: Http://Www.Dot.Ca.Gov/Dist07/Sync/Cpimages/File/Historic%20Arroyo%20Seco.Pdf

[12] California Department of Transportation. "California Scenic Highway Mapping System: Route 110 Photo Album."

[13] California Department of Transportation. Accessed 21 May 2010. "Byway–State Route 110." Available at: http://www.dot.ca.gov/dist07/sync/cpimages/file/updated%20fact%20sheet.pdf

courses, beaches, and other private open space lands. Compliance with the Conservation and Open Space element goal and policies contributes towards avoiding atheistic impacts and or reducing visual impacts. The following goal and policy from the Conservation and Open Space element are relevant to the proposed project.[14]

> **Goal.** To preserve and protect sites of historical, archeological, scenic, and scientific value.
>
> **Policy 16.** Protect the visual quality of scenic areas, including ridgelines and scenic views from public roads, trails, and key vantage points.

County General Plan Scenic Highway Element

The Scenic Highway element provides goals, policies, and action items related to the establishment and protection of scenic highways in the County by identifying and evaluating a system of existing roads that traverse areas of scenic beauty and interest. The element's policies support the County General Plan policy of protection of environmental, social, and economic values associated with aesthetic scenic corridor resources and expansion of the opportunity for the enjoyment of these resources. Actions affecting the quality of roadside scenic resources should be based on the intent of the Scenic Highway Element's goals.[15] As the proposed project site is not within a scenic corridor, the intent of the goals and policies is relevant only to the extent that it provides guidance in avoiding and reducing aesthetic impacts.

Los Angeles County Zoning Ordinance[16]

The Zoning Ordinance (Title 22 of the Municipal Code), in conformance with the General Plan, regulates land use development within the County. The Ordinance also indicates Zoning Districts for parcels of land within the County. Within each Zoning District, the Zoning Ordinance specifies the permitted and prohibited uses, as well as the development standards including setbacks, height, parking, and design standards, among others.

As previously noted, the County zoning designation for all parcels within the proposed project (APNs 6140-028-902, 6140-028-900, 6140-028-907, and 6140-028-903) is Neighborhood Commercial (C-2; Neighborhood Business Zone). This zoning designation is established to identify community-related commercial uses and permits the following uses: drugstores, medical clinics (including laboratories), professional or business office space, parking lots and buildings, and hospital equipment and supply rentals.[17]

The County has established development standards for the Neighborhood Business Zone:

> No more than 90 percent of the net area can be occupied by buildings, with a minimum of 10 percent of the net area landscaped with a lawn, shrubbery, flowers

[14] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[15] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[16] County of Los Angeles, Los Angeles County Code, *Title 22, Planning and Zoning*. Available at: http://search.municode.com/html/16274/_DATA/TITLE22/index.html

[17] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

and/or trees, which shall be continuously maintained in good condition. Incidental walkways, if needed, may be developed in the landscaped area; that there be parking facilities as required by Part 11 of Chapter 22.52; and that a building or structure shall not exceed a height of 35 feet above grade, excluding signs which are permitted by Part 10 of Chapter 22.52 (such as chimneys, and rooftop antennas).[18]

The zoning classification for C-2 does not have a setback requirement.[19] Tier I is a replacement development with ancillary uses. Tier II is an expansion of the medical campus facilities. The County would seek to ensure compatibility of the proposed project with the existing campus and its surroundings but reserves the right to exempt elements of the proposed project from the zoning designation. Therefore, the proposed development would not conflict with the permitted uses of this zoning designation, and no General Plan amendment or zone change would be required. However, specific project elements, such as the residential development, may be subject to additional approvals, which include, but are not limited to, approvals such as a conditional use permit, and would be required to meet the conditions of the permit.[20] It is anticipated that the County would obtain the required approvals and permits during the site-specific planning and individual project approval phase of the proposed project and would be required to meet the specified conditions.

3.1.2 Existing Conditions

This subsection provides a detailed narrative of the existing conditions at the proposed project site in relation to scenic vistas, nearby scenic highways, visual quality of the site, shade and shadow and light and glare to support the content for the resource analysis. A field survey of the project area and the surrounding area (areas within view of the project area) was conducted on March 24, 2010, to evaluate the existing setting and develop an informed assessment of the potential effects of the proposed project on visual and aesthetic resources.

3.1.2.1 Scenic Vistas

The County of Los Angeles General Plan, the Conservation and Open Space element, and the Recreation element were evaluated with regard to scenic resources and the components proposed by the project.[21,22] Typically, a scenic vista is defined as a view of an area that is visually or aesthetically pleasing. Aesthetic components of a scenic vista include (1) scenic quality, (2) sensitivity level, and (3) view access. One example of a scenic vista would be the area encompassing a lake or a park-land water amenity, and the viewshed extending from the lake to the highest visible point surrounding the lake. An urban setting can offer scenic vistas as well, due

[18] County of Los Angeles Department of Regional Planning. Accessed 4 May 2010. "Zoning Ordinance Summary—Commercial Zones." Available at: http://planning.lacounty.gov/luz/summary/category/commercial_zones/

[19] County of Los Angeles Department of Regional Planning. Accessed 4 May 2010. "Zoning Ordinance Summary—Commercial Zones." Available at: http://planning.lacounty.gov/luz/summary/category/commercial_zones/

[20] County of Los Angeles, Los Angeles County Code, *Title 22, Planning and Zoning.* Available at: http://ordlink.com/codes/lacounty/_DATA/TITLE22/Chapter_22_28_COMMERCIAL_ZONES.html#3

[21] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan, Conservation and Open Space Element.* Los Angeles, CA. Available at: http://ceres.ca.gov/docs/data/0700/791/HYPEROCR/hyperocr.html

[22] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA. Available at: http://ceres.ca.gov/docs/data/0700/791/HYPEROCR/hyperocr.html

to the value provided by architectural style, landscaping, and or the historical significance of a development. The skyline of Downtown Los Angeles is an example of an urban setting that offers a vivid landscape in contrast with the surrounding areas. However, because the Downtown Los Angeles skyline is located approximately 9 miles from the proposed project site, the skyline is not considered readily visible from the proposed project site or surrounding area under existing conditions, and the proposed project site is therefore not considered to have a high level of sensitivity for scenic vista impacts.

The Juan Bautista de Anza National Trail, a historic route that stretches 1,210 miles from Nogales, Arizona to San Francisco, California is located to the north of the project area. The distance between the Juan Bautista de Anza National Historic Trail and the proposed project is approximately 9.2 miles. The existing ground of the proposed project site has elevations ranging from approximately 86 to 88 feet above mean sea level (msl). The proposed project site has the highest elevation at the east and dipping towards south and west. Scenic vistas with local environmental quality such as coastal, desert, and mountain views are not visible from within the proposed project site, as the proposed project site and surrounding areas are comprised of an urbanized setting. The proposed project site represents only a small and distant portion of the potential viewshed from the trail. Therefore, the proposed project site is not considered to have a high level of sensitivity with regard to scenic vistas from the trail. As supported by the County General Plan, there are no other scenic resources including, but not limited to, significant trees or unique rock outcrops located within the project vicinity. [23]

3.1.2.2 Scenic Highways and Resources

According to the County General Plan,[24] there are no officially designated scenic highways within the vicinity of the proposed project site. A portion of State Route 2 (Angeles Crest Highway), from the National Forest Boundary to the San Bernardino County Line,[25] located approximately 14 miles north of the proposed project site, is identified as an "Officially Designated State Scenic Highway." The proposed project site is located approximately 2 miles east of SR 110. The Caltrans Scenic Highway System has identified segments of SR 110 as a "Historic Parkway," which is distinct from an official scenic designation.[26] A Historic Parkway designation was given to a portion of SR 110 given the highway's unique and historic engineering. SR 110 was the first freeway—a grade-separated, limited-access, high-speed divided road—in the western United States. SR 110 is identified as a Historic Parkway between milepost 25.7 and milepost 31.9 in Los Angeles.[27] The designation begins near Glenarm Street in the Pasadena area, to US 101 in Downtown Los Angeles for approximately 8.2 miles.[28] The designated portion of SR 110 route passes through Chinatown and Elysian Park, and the Cypress Park neighborhood in Downtown Los Angels, approximately 14 miles away from the proposed project site; it is not likely that the project site would be discernable

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[23] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[24] California Department of Transportation. 5 October 2007. *Eligible (E) and Officially Designated (OD) Routes*. Available at: http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm

[25] County of Los Angeles Department of Regional Planning. 11 October 1974. *County of Los Angeles General Plan, Scenic Highway Element: Scenic Highway System Map Index*. Los Angeles, CA.

[26] California Department of Transportation. 1 May 2006. The California Scenic Highway System: A List of Eligible (E) and Officially Designated (OD) Routes (by Route). Available at: http://www.dot.ca.gov/hq/LandArch/scenic/schwy1.html

[27] California Department of Transportation. "California Scenic Highway Mapping System: Route 110 Photo Album."

[28] California Department of Transportation. Accessed 21 May 2010. "Byway–State Route 110." Available at: http://www.dot.ca.gov/dist07/sync/cpimages/file/updated%20fact%20sheet.pdf

at these distances. The proposed project would add additional buildings to the existing urban development is prevalent in the region between SR 110 and the edge of the proposed project site, which includes residential, commercial, public facilities, and some industrial buildings (as determined by site assessments and regional maps).

3.1.2.3 Visual Character

The proposed site for the proposed project is located on the existing 38-acre Martin Luther King, Jr. Medical Center Campus, and therefore is developed with medical and medical support structures including: outpatient and administrative support buildings, ancillary structures, and parking structures. The project site consists of 21 buildings, landscaping and ancillary support facilities: Genesis Clinic, Oasis Clinic (old), Oasis Clinic (new), Registration Building, Augustus F. Hawkins Comprehensive Mental Health Center, Inpatient Tower, Multi-Service Ambulatory Care Center (MACC), Pediatric Acute Care Building, Medical Records and Laundry Building, Central Plant, Plant Management Building, North Support Building, South Support Building, Interns and Physicians Building, Emergency Room, Storage Building, magnetic resonance imaging (MRI) Building, Claude Hudson Auditorium, Cooling Towers, Hub Clinic, and an additional Storage Building. Landscaping within the proposed project boundary consists of trees, shrubs, and general non-native vegetation for landscaping line areas surrounding the buildings. Lawn and other open space areas are also located throughout the property. In addition, the campus provides a multilevel parking structure available for parking and several surface lots.

Visual sensitivity can be described as viewer awareness of visual changes in the environment and is based on viewers' activities from public areas near a particular site, in this case, the proposed project site. To assist in defining the visual quality of the proposed project site, important views that include the proposed project site have been identified as key viewpoints (KVPs). In order to portray the aesthetic character of the proposed project site, photographs were taken of the proposed project site from several KVPs. These KVPs are typically public viewing areas and include a variety of locations at the medical campus and in the vicinity of the proposed project campus. The KVPs include foreground views (0 to 500 meters), middle-ground views (500 to 2,000 meters), and background views (greater than 2,000 meters) from several locations. Appendix B, *Aesthetics Analysis Technical Report,* provides eight figures that illustrate the views from the KVPs. The KVPs depict view from the proposed project site and from sites (such as the residences) surrounding the proposed project site.

As indicated above, visual sensitivity is based on viewers' activities from public areas near a particular site, in this case, the proposed project site. The existing campus is accessible via both pedestrian and vehicular traffic. Public access is available off 120th Street and Wilmington Avenue. The existing campus is also accessible by public transportation. There are two bus stations located on the existing campus: one located on the northern boundary on 120th Street, and the other located on the eastern boundary on Wilmington Avenue. In addition, a Blue Line and Green Line Metro stations are located approximately 0.5 mile northeast of the existing campus; the Blue Line and Green Line Metro stations have a shuttle bus that transports individuals between the existing campus and Blue Line and Green Line Metro stations.

The areas surrounding the existing Martin Luther King, Jr. Medical Center Campus include various commercial, retail, transit, and institutional land uses. Among these uses are the Charles Drew University of Medicine and Science (CDU), the Rosa Parks Transit Station, the Kenneth Hahn Plaza and Village, and various residential neighborhoods, commercial businesses, public and semipublic, industrial, open space, and transportation uses.

3.1.2.4 Shade and Shadow

New development can create new shadows that shade private and public outdoor space. Shadow-sensitive receptors would be considered residences (particularly yards), solar collectors, recreational facilities and parks, schools, and or outdoor restaurants. Shadow is dependent on the height, size and shape (or massing) of the building from which shadow is cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth and the Earth's elliptical orbit. The longest shadows are cast during winter months and the shortest shadows are cast during the summer months. The shortest day of the year (i.e., the shortest day of the year and the longest night) is the winter solstice, which occurs in late December.

3.1.2.5 Light and Glare

Perceived glare is the unwanted and potentially objectionable sensation as observed by a person as they look directly into the light source (e.g., the sun, its reflection, automobile headlights, or other light fixtures). Reflective surfaces on existing buildings, car windshields, etc. can expose people and property to varying levels of glare. A significant light impact would typically occur if a proposed project would cause a substantial increase in ambient illumination levels beyond the property line, visible glare from either fixtures or illuminated surfaces, or if it were to cause new lighting to spill-over onto light-sensitive land uses such as residences, schools, parks, or public open space.

The primary sources of light on the proposed project site include; light emanating from building interiors that passes through windows, automobile headlights and light from exterior sources (i.e., street lighting, building illumination, etc.). Existing sources of light at the proposed project site also include light structures in surface parking areas, and security lighting on buildings. The majority of existing building materials are inherently non-reflective; they do not provide a source of glare during the daytime when sunlight is present.

This analysis addresses only project-related lighting. Street lighting, required for safety, would not be affected by the proposed project.

3.1.3 Significance Thresholds

The potential for the proposed project to result in impacts related to aesthetics was analyzed in relation to the questions contained in Appendix G of the CEQA Guidelines.[29] The proposed project would be considered to have a significant impact to aesthetics when there is the potential for any of the following four thresholds to occur:

- Results in a substantial adverse effect on a scenic vista
- Substantially damages scenic resources, including but not limited to, trees, rock outcrops, and historic buildings within a state scenic highway
- Substantially degrades the existing visual character or quality of the site and its surroundings
- Creates a new source of light or glare that would adversely affect day or nighttime views in the area

[29] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

3.1.4 Impact Analysis

This analysis provides a quantitative and qualitative investigation of the potential impacts based on existing conditions and the design of the project's buildings' scale, general shade and shadow, light and glare, and landscaping on sensitive receptors present in the vicinity of the project site. As indicated above, the potential aesthetic impacts of the proposed project are evaluated considering factors such as the scale, mass, and landscaping/buffering associated with the design of the proposed project.

3.1.4.1 Scenic Vistas

An aesthetic resource consists of the landforms, vegetation, water features, and cultural modifications that impart an overall visual impression of an area's landscape. Scenic areas typically include open space, landscaped corridors, and viewsheds.[30] The property is located approximately 9.2 miles south of Juan Bautista de Anza National Historic Trail. The distance between the Juan Bautista de Anza National Historic Trail and the proposed project is large enough that the proposed project site is not visible from this Historic Trail. Moreover, urban development—including residential, commercial, and industrial buildings—is widespread within the 9.2 miles between the proposed project's northern boundary and where the Juan Bautista de Anza National Historic Trail commences. Therefore, the proposed project would have no adverse impact to a designated scenic trail; substantially degrade the visual character of the area, or negatively impact views from the designated trail.

Under CEQA, an impact on views is considered significant if a view of a public scenic vista, scenic resource, or public object of aesthetic significance, is substantially impeded or obstructed from a public vantage point. Typically, views enjoyed from a particular private vantage point are generally not protected. The Court of Appeal held in *Topanga Beach Renters Assn. v. Department of General Services* (1976) 58 Cal.App.3d 188, 195, "[t]he issue is not whether [the Project] will adversely affect particular persons, but whether [the Project] will adversely affect the environment of persons in general." Views would remain along the perimeter of the project site, as well as between buildings, on sidewalks, and adjacent roadways.

The area surrounding the project site is an urbanized mix of existing development, including commercial, office spaces, public facilities, and residential land use. Residential development provides low- to moderate-density housing opportunities, including single-family homes along the west, south, and east sides of the medical campus boundary. Multi-family residential developments are also located along the eastern boundary of the project site, located on the opposite side of Wilmington Avenue. Zoning designations surrounding the proposed project site include Single-family Residential (R-1) to the south and west, Limited Multiple Residences (R-3) to the east, and Two-family Residence (R-2), and Commercial (C-2; specifically, Neighborhood Commercial) to the north. Other zoning designations within the vicinity of the proposed project site include Commercial Planned Development, Unlimited Commercial, Light Manufacturing, Restricted Business, and Restricted Parking.

[30] A view corridor is typically defined as the line of sight of an observer from a public viewpoint, looking toward an object of significance to the community (e.g., ridgeline, river, historic building, etc.), or as the route that directs the viewers attention. A viewshed is typically defined as the area within view from a defined observation point.

The proposed project site and the surrounding area, as observed by its existing conditions, do not meet the criteria of a scenic vista as described above. The proposed project site is located in an area developed with public facilities, commercial uses, and residential structures. There are no designated scenic vistas within the vicinity for the proposed project property.

The County zoning designation for the project site is C-2, which identifies community-related commercial uses including drugstores, medical clinics (including laboratories), and parking lots and buildings.[31] Typically, buildings within this zoning are limited to 35 feet in height; however, although the County would seek to ensure compatibility of the proposed project with the existing campus and its surroundings it reserves the right to exempt elements of the proposed project from the zoning designation. Building heights at the existing project site range between 13 feet to 78 feet tall. Despite the scale of several buildings on the existing project site, the distance between the proposed project site and the skyline is large enough for the public to access views both within and outside the proposed project boundary. The areas where the public would be able to view the proposed project includes nearby residences, sidewalks, and adjacent roadways. As previously noted, the visual character of the area consists of various urban developments. Properties in the surrounding area have varying fence styles, and other appurtenances, such as mail boxes, building trim, and hardscaping (e.g., driveways).

The proposed project would result in an addition to the urbanization in the surrounding area than currently exists, such as the construction of more medical buildings, commercial, office and residential uses than those that are present at the proposed project site. Once constructed,[32] the proposed project would add to the diverse urban style of the area, and would maintain the character of the area with regard to open space, vegetation, and landscaping.

Tier I

Tier I would incorporate new buildings and landscaping at the existing campus, such as landscaping at the entry of the new MACC and its surrounding area.

Visual quality describes the intrinsic aesthetic appeal of a landscape or scene due to a combination of physical characteristics (such as a landform, body of water, and vegetation) and cultural modifications (physical change to a landscape caused by human activity). Visual character is influenced by many different landscape attributes including color contrasts, landform prominence, repetition of geometric forms, and uniqueness of textures among other characteristics. The proposed project site is presently developed as a medical campus with existing supporting uses. The proposed project site does not contain any scenic resources such as trees, rock outcroppings, and unique or landmark features. As proposed, Tier I of the project would not obstruct any prominent scenic vista or views open to the public; or result in the creation of an aesthetically offensive site from a designated scenic public view. As proposed, Tier I of the project would not result in significant impact to scenic vistas.

[31] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[32] Tier II project components are in the preliminary stages and may requires additional environmental analysis on a project by project basis pending their final engineering and design.

Tier II

Tier I would incorporate mixed-use campus support development that would provide the health services necessary to respond to and address the needs of the community. Tier II would have the potential to build-out approximately 1,814,696 square feet of development on the proposed project site.

The proposed project site does not contain any scenic resources such as trees, rock outcroppings, and unique or landmark features. As proposed, Tier I of the project would not obstruct any prominent scenic vista or views open to the public, or result in the creation of an aesthetically offensive site from a designated scenic public view. As proposed, Tier II of the project would not obstruct any prominent scenic vista or views open to the public, or result in the creation of an aesthetically offensive site from a designated scenic public view. Therefore, Tiers I and II of the proposed project would not result in a significant impact on a scenic vista.

3.1.4.2 State Scenic Highways and Resources

The proposed project would not be located within the viewshed of an Officially Designated Scenic Highway as designated by the Caltrans Office of State Landscape Architecture.[33] As indicated above, the proposed project site is located approximately 2 miles east of the SR 110 freeway. Urban development is prevalent in the region between SR 110 and the edge of the proposed project site, which includes residential, commercial, public facilities, and some industrial buildings as determined by site assessments and regional maps. The density of the existing development as well as the distance of SR 110 from the proposed project site, is large enough to obstruct the viewshed from SR 110 in viewing the project site. In addition, the proposed project is not located on or within the viewshed of the scenic segment of SR 110, or any other scenic highway corridor, nor is the project located at an elevation that would significantly degrade the view of the surrounding area. No designated scenic highways are present in the immediate project vicinity and no scenic highway viewsheds would be affected by the proposed project.

Tier I

As designated scenic highways are not present in the immediate project vicinity, no scenic highway viewsheds would be affected by Tier I of the proposed project. Tier I would not be expected to result in significant impacts to visual resources related to damaging a scenic resource within a state scenic highway.

Tier II

As designated scenic highways are not present in the immediate project vicinity, no scenic highway viewsheds would be affected by Tier II of the proposed project. Tier II would not be expected to result in significant impacts to visual resources related to damaging a scenic resource within a state scenic highway.

[33] California Department of Transportation. 5 October 2007. *Eligible (E) and Officially Designated (OD) Routes.* Available at: http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm

3.1.4.3 Visual Character

This visual character subsection evaluates the visual impacts of the proposed project on potential viewers of the proposed project. The proposed project would alter the existing visual quality of the site and its vicinity. As illustrated in the KVPs included in Appendix B, the proposed project area is primarily visible from existing sidewalk, adjacent streets, and from the residential and commercial land uses located in the immediate area.

The assessment of visual quality for a development project is an assessment of the aesthetics in relation to its surroundings. Determinants of visual quality include land uses, density or intensity of land use, extent of open space and landscaping, building height and mass, architecture, and pedestrian usage or "walkability" of a neighborhood, among others. Land uses surrounding the proposed project area include Public and Semipublic Facilities and Major Commercial (C) to the north, Medium-density Residential [12 to 22 dwelling units (du)/acre] to the east, Low-density Residential (1 to 6 du/acre) to the south, and Low-density Residential (1 to 6 du/acre) and Low/Medium-density Residential to the west. Other land uses within the vicinity of the project site include High-Density Residential, Major Commercial, Major Industrial, Open Space, and Transportation Corridor. The Public and Semipublic Facilities as well as Major Commercial land uses include office and commercial structures with observed height of up to three stories tall. There are single-family residences to the west, south and east, and multi-family structures located to the east of the project site. In addition, there are homes located to the south of the project site adjacent to the alleyway. These residences are separated by a brick retaining wall and tress, which line the south side of the alleyway. The visual characterization of the surrounding area is typical of a residential development. Many of the residential structures has have stucco finish in natural hues such as beige, brown, or grey. Surrounding streets have sidewalks, and development in the area incorporates building setbacks and landscaping. Commercial areas have large surface-level parking areas.

The proposed project site is characterized by large medical buildings, surrounding by multiple areas of open space, which have been developed with grass lawns and paved parking lots. The medical campus is designed with large landscaped areas, which include the substantial-sized lawn to the east of the MACC, gardens, courtyards, and circulation routes for pedestrians and vehicles. There are several pedestrian walkways that enable medical personnel and students to travel expeditiously around the campus. The MACC, for example, is connected to the Claude Hudson Auditorium via a low covered walkway that extends from the MACC's east façade, which provides a physical link between the medical (MACC) and assembly (Auditorium) uses. Existing gardens and courtyards, particularly those associated with the Augusts F. Hawkins Comprehensive Mental Health Center and the Interns and Physicians Building, provided recreational facilities for medical students. There are 21 buildings and structures at the project site. The design and use of materials for construction of these existing structures along with the landscaped areas of the campus dominate the overall urban visual image of the project's immediate surrounding area.

Tier I

The County will seek LEED Silver certification for the MACC and the Ancillary buildings.[34] Tier I would also include tenant improvements to the following existing buildings: North Support Building, South Support Building, Interns and Physicians Building, and the Plant Management

[34] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

Building; site improvements; and potential relocation of the MRI building. The new buildings would be contained within the existing campus and would be designed to complement the existing campus buildings. Tier I is consistent with the existing land uses at the site and in the adjacent area, and would be compatible with the visual appearance of the surrounding area and would result in less than significant impacts to visual character.

Tier II

The development envelope of Tier II allows for additional medical office space, general offices, commercial and retail space, residential units, and other facility improvements. Tier II is generally consistent with the existing land uses at the site and in the adjacent area. However, as many of the Tier II project elements and design features are unknown, and Tier II may result in significant alterations to buildings being added or removed from the campus, this impact is considered potentially significant and would require the implementation of mitigation measures to be reduced to below the level of significance.

Many of the surrounding residents near the project site are oriented away from the proposed site. The proposed project would be generally compatible with the visual appearance of the existing community, although the campus would maintain a different style given the facilities' past and continued medical uses. Medical, commercial, and residential developments are not visually incompatible. It is anticipated that the design of the proposed project would incorporate a complimentary style for all proposed structures. Architectural continuity within the campus would be achieved through consistency in the quality of design, workmanship, and materials utilized. The building orientation and envelope system are planned to maximize daylight into the interior space, optimize exterior envelope energy performance and maximize view to the natural elements of the outdoors.[35]

The site work would also consist of a new parking areas, re-striping of existing lots, site improvements, and new landscaping at the entry of the new (or refurbished and reused) MACC and its surrounding area. Tier II of the proposed project would allow for a development envelope that would provide the health services necessary to respond to and address the needs of the community. All campus development would be subject to the design goals and guidelines of a Master Plan for the campus, which would ensure the development on the campus is consistent and compatible with the of the proposed project with the existing campus and its surroundings; in addition, the proposed development would be subject to general design criteria, specified in the proposed project's mitigation measures. Tier II of the proposed project is not anticipated to "degrade the existing visual character of quality of the site and its surroundings," as stated in the CEQA criterion, however, the impact is considered potentially significant given many of the unknown design elements and mitigation measures have been provided to ensure that impacts are reduced to less than significant.

3.1.4.4 Daytime: Shade and Shadow

The shade analysis examined shade-sensitive uses including residential uses, schools, parks, open space, and public outdoor facilities. Existing shadow was not considered significant given that the existing buildings are located in the central and southern portions of the medical campus and do

[35] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

not generate adverse shadow impacts. Commercial and retail uses are not considered shade-sensitive.

Tier I

Tier I of the proposed project, which consists of the development of a four-story 132,000-square-foot building and a 24,700-square-foot, two-story building would have no adverse impacts related to shade and shadow. These buildings would be located in the center of the campus and because of the size of these structures and the location of these structures (adjacent to structures that are two to five stories tall), they would not contribute to or create a new significant source of shade or shadow. Impacts would be less than significant.

Tier II

Tier II was examined on a programmatic level and the analysis was based upon the height of tallest existing building on the proposed project site (which is a six-story building). This height was then used as the height of a building that could to placed continuously along the west and east perimeter of the campus property. Shadow representations were generated through the use of shadow calculation software for the proposed project (Figure 3.1.4.4-1, *Potential Shade or Shadow Impacts: Worst-Case Scenario*, and Figure 3.1.4.4-2, *Possible Placement of Building Causing No Shade or Shadow Impacts*).[36]

Figure 3.1.4.4-1 illustrates the worst-case shade and shadow scenario for Tier II: development of a six-story building placed continuously along the edge of the existing campus property boundary. Figure 3.1.4.4-1 presents a building height of six-stories[37] (or 78 feet tall) and also assumes that there would not be any setbacks from the property boundary and roadways. At a minimum the development components in Tier II would have an approximately 14-foot setback from the property boundary, which is consistent with the setbacks for the existing buildings on the property.[38] As depicted in the figures, the areas that have the potential to be shaded by the worst-case shade and shadow scenario include residences to the west and to the east of the proposed project site. No shadow impacts would occur along the southern boundary of the property given the placement of the proposed project site relative to the sun's rising and setting patterns.

For the western campus property line, given the project site's longitude and latitude, the time frame with the longest shadows would occur in the winter from 6:23 a.m. to 7:18 a.m. and in the summer from approximately 5:42 a.m. to 6:29 a.m. If the above-described six-story (worst-case height) Tier II building were placed along the edge of the western campus property line, it would have the potential to shadow approximately 17 homes along Compton Avenue during the winter morning hours and approximately 12 homes during the summer morning period. Shade impacts on these adjacent land uses would increase and or decrease progressively as the Earth rotates;

[36] Google's Sketch-Up 7.1, was utilized for preparation of the analysis diagrams. The hypothetical buildings were placed imported into Google Earth using the sunrise/sunset light module in Google Earth.

[37] This analysis used the height of the tallest existing building on the medical campus as a basis for the shadow estimate illustrated in Figures 3.1.4.4-1 and Figure 3.1.4.4-2. Tier II is in the preliminary stages of design, however, the average anticipated building height is not expected to exceed three stories.

[38] The existing setbacks include the pediatric modular building/ oasis clinic located approximately 14.8 feet from the property line along Wilmington Avenue, Interns and Physicians Building at approximately 20.0 feet from property line along Compton Avenue, the Hawkin's Building located at approximately 30.7 feet from property line along 120th Street, and the Cooling Tower located at 44.8 feet from property line along south property line.

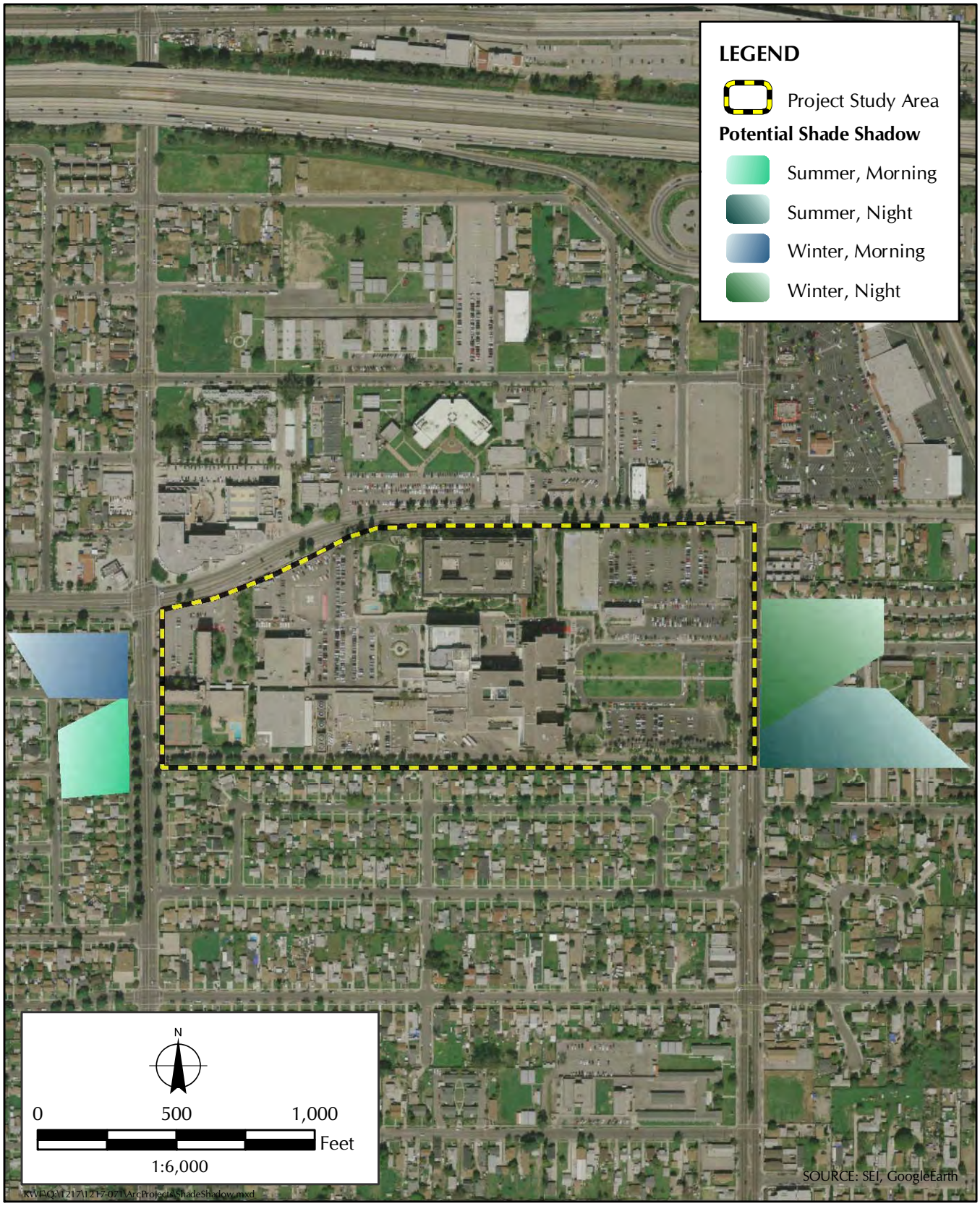

FIGURE 3.1.4.4-1

Potential Shade or Shadow Impacts: Worst-Case Scenario

FIGURE 3.1.4.4-2

Possible Placement of Building Causing No Shade or Shadow Impacts

however, the duration of the shadow could last up to a maximum of one and a half (1.5) hours for the homes closest to the proposed project site.

For the eastern campus property line, given the project site's longitude and latitude, the time frame with the longest shadows would occur in the winter from 3:53 p.m. to 4:48 p.m. and in the summer from approximately 6:48 p.m. to 8:08 p.m. If the above-described six-story (worst-case height) Tier II building were placed along the edge of the eastern proposed project boundary, it would have the potential to shade approximately 20 single-family residential homes along Wilmington Avenue during the winter night period and approximately 20 single-family residential homes and approximately five multi-family buildings during the summer night period. The duration of the shadow could last up to one and a half (1.5) hours for the homes closest to the proposed project site. Continuous and prolonged shade and shadow on adjacent residents could represent a potentially significant impact. However, the shading of adjacent properties by the proposed buildings would only occur for a short duration during the day/night and only for a small portion of the year, the impact to the adjacent residents is anticipated to be less than significant. Additionally, mitigation measures have been provided to ensure that impacts remain less than significant.

As depicted in Figure 3.1.4.4-2, reasonable building setbacks have been incorporated into the shade and shadow projections at the project site. As displayed in Figure 3.1.4.4-2, with implementation of building setbacks, potential shadows would fall within the project site avoiding impacts on adjacent residences, roads and other land uses. These setbacks significant reduce shade impacts to these adjacent uses. The likelihood of shadow spillover is low given the medical facilities existing building layout (buildings that would remain on site), access to proposed buildings (allowed under Tier II), emergency medical access and general transportation and facility parking needs. Impacts to aesthetics related to shade and shadow for Tier II of the proposed project would be reduce to below the level of significance with incorporation of mitigation measures.

3.1.4.5 Daytime and Nighttime: Light and Glare

The proposed project would be expected to result in less than significant impacts to aesthetics after mitigation is incorporated related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the project area. As supported by project design guidelines, the proposed project would create a level of light and glare that is consistent with existing light and glare conditions at the proposed project site. Moreover, new sources of light and glare from implementation of the proposed project would not be considered to substantially increase after mitigation.

As stated above, there are three primary sources of light on the proposed project site: light emanating from building interiors that passes through windows; light from the headlights of parked, and traveling vehicles and light from exterior sources. The construction of the proposed project would involve the presence of additional interior lighting within the proposed facilities and their activation during non-daytime hours would create additional effects of increased lighting. The residential component of the project would create a minor source of light due to the residents' interior lights; however, the residential lighting proposed would be similar to the amount of light generated by the single-family and multi-family residences located adjacent to the project site, along the west, south, and east sides. No adverse impacts would be anticipated from interior light sources.

There are currently no significant sources of glare at the project site (e.g., mirrored buildings, building materials, etc.). As proposed, the project would not contain large expanses of reflective or

mirrored building surfaces or glare producing light fixtures; however, mitigation measures have been provided to ensure that impacts remain less than significant. As stated in the Martin Luther King, Jr. Medical Campus Center, Campus Planning and Programming Report,[39] the architecture of the proposed building would be designed "to be sustainable, soothing, and uplifting. It should capture the spirit of the contemporary architecture at the site. The building orientation and envelope system are planned to maximize daylight into the interior space, optimize exterior envelope energy performance and maximize view to the natural elements of the outdoors."

Tier I

Tier I involves project-level development of the new MACC, Ancillary Building, and other site improvements. Pedestrian scale street lamps, which would be coordinated with the landscape elements, would be located adjacent to the buildings and near the parking areas to provide safety and allow for appropriate nighttime visibility. The construction of the proposed project would involve the presence of additional interior lighting within the proposed facilities and their activation during non-daytime hours would create additional effects of increased lighting. These lights would be expected to contribute to minimal increases and alterations in the location of light and glare at the campus during construction and operation of the Tier I proposed project.

Tier I of the proposed project would incorporate low–level, downward-facing lights that would be used to illuminate the entrance of buildings, stairs, and where pathways occur between buildings, and adjacent to designated parking areas. Therefore, the light and glare effects of the proposed project's construction and operation would not be anticipated to result in a significant impact to the surrounding developments; however, mitigation measures have been provided to ensure that impacts related to Tier I of the proposed project remain less than significant.

Tier II

The construction of the proposed project would involve the presence of additional interior lighting within the proposed facilities and their activation during non-daytime hours would create additional effects of increased lighting. The components of the Tier II development would involve pedestrian, security, and parking lighting within and around the perimeter of project site. These lights are intended to enhance the visual character of the buildings and provide necessary pedestrian safety lighting for patients, workers, and visitors using the sidewalks throughout the project site. These lights would be expected to contribute to increases in light and glare at the campus during construction and operation of Tier II of the proposed project.

Tier II of the proposed project would incorporate low–level, downward facing lights that would be used to illuminate the entrance of buildings, stairs, and pathways between buildings and adjacent to designated parking areas. The residential component of the project would create a minor source of light due to the residents' interior lights; however, the residential lighting proposed would be similar to the amount of light generated by the single-family and multi-family residences located adjacent to the project site, along the west, south, and east sides. Lighting placement and selection would be carefully considered to reduce the chance of glare and light spillover to adjacent land uses. The proposed project's landscape lighting is intended to provide a softened nighttime appearance for the medical campus site. Therefore, the light and glare effects of the proposed project's construction and operation would not be anticipated to result in a significant impact to

[39] Martin Luther King Jr. Medical Campus Center, Campus Planning and Programming Report, Executive Summary, September 18, 2009.

the surrounding developments; however, mitigation measures have been provided to ensure that impacts related to Tier II of the proposed project remain less than significant.

3.1.4.6 Cumulative Impacts

The incremental impacts of the proposed project to aesthetics, when added to the related past, present, or reasonably foreseeable future projects listed in Section 2, *Project Description*, would be expected to be less than significant. The recommended mitigation measures would reduce project-specific impacts to below the level of significance.

It was determined that there are at least 42 projects within an approximately 3-mile radius of the proposed project that could affect the cumulative impacts analysis of the proposed project (Section 2).

Tier I

Scenic Resources

There are no officially designated scenic highways within the vicinity of the proposed project site. Therefore, the cumulative development would not result in significant impacts on scenic highways ,and the proposed project would not contribute to cumulative impacts to scenic vistas and scenic resources.

Visual Character

Development of the related projects would gradually change the character of the City of Compton, City of Los Angeles, City of Lynwood, City of South Gate, and the County of Los Angeles. The potential for projects to have a cumulative impact depends on both geographic location as well as the project's schedule. Projects considered in this analysis were derived from the traffic study and include those that have recently been completed, are currently under construction, or are in the planning phase. The closest related projects include the South Public Heath Clinic located north of the existing medical campus facility in unincorporated territory of the County Los Angeles, a planned high school located at 11300 Monitor Avenue approximately 0.5 mile from the proposed project in the City of Los Angeles, and the proposed residential development located at 2709 North Wilmington Avenue approximately 0.4 mile from the proposed project in the City of Compton. The high school and the residential development fall under other jurisdictions as do the majority of the related projects. As such, those projects would be subject to their city's respective land use and zoning requirements. It is anticipated that these projects would be designed to include architectural and landscape design features that are in accordance with the existing standards and design guidelines set forth in each respective jurisdiction. Therefore, these related projects, individually, would not degrade the visual character of the area. If a significant impact were to occur from a related project, that project would be required to mitigate the impact as appropriate under their city's jurisdiction. As previously stated, the proposed project is not within a designated scenic vista or scenic highway, and all aesthetic impacts would not be considered significant after mitigation. Considering the nature of the project and the limited scope of views affected by the proposed project. The proposed project's contribution to adverse impacts on visual resources to the surrounding area or other related projects would not be cumulatively considerable. Overall, the visual character in the project vicinity would not significantly change from being a predominantly medical and an urban environment. These changes would not result in the degradation of the Martin Luther King, Jr. medical facility or the surrounding area. Therefore, the proposed project

would be expected to result in a less than significant contribution to the cumulative visual character.

Light and Glare

Tier I involves project-level development of the new MACC, Ancillary Building, and other site improvements. Pedestrian scale street lamps, which would be coordinated with the landscape elements, would be located adjacent to the buildings and near the parking areas to provide safety and allow for appropriate nighttime visibility. These lights would be expected to contribute to minimal increases and alterations in the location of light and glare at the campus during construction and operation of the Tier I proposed project.

Shade and Shadow

Tier I of the proposed project, which consists of the development of a four-story, 132,000-square-foot building and a 24,700-square-foot, two-story building would have no adverse impacts related to shade and shadow.

Tier II

Scenic Resources

There are no officially designated scenic highways within the vicinity of the proposed project site. Therefore, the cumulative development would not result in significant impacts on scenic highways and the proposed project would not contribute to cumulative impacts to scenic vistas and scenic resources.

Visual Character

Development of the related projects would gradually change the character of the City of Compton, City of Los Angeles, City of Lynwood, City of South Gate, and the County of Los Angeles. It is anticipated that these projects would be designed to include high-quality architectural and landscape design features in accordance with the standards and design guidelines set forth in each respective jurisdiction. Therefore, these related projects, individually, would not degrade the visual character of the area. If a significant impact were to occur from a related project, that project would be required to mitigate the impact as appropriate. Overall, the visual character in the project vicinity would not significantly change from being a predominantly medical and an urban environment. These changes would not result in the degradation of the Martin Luther King, Jr. medical facility or the surrounding area. Therefore, the proposed project would result in a less-than-significant contribution to the cumulative visual character.

Light and Glare

Development of the proposed project in conjunction with other cumulative projects would gradually result in an increase in light in the City of Compton, City of Los Angeles, City of Lynwood, City of South Gate, and the County of Los Angeles. The proposed project's individual impacts can be reduced to less than significant with mitigation incorporated. Given that the proposed project would not result in a project-level significant impact, the proposed project would not contribute to a significant cumulative impact related to nighttime views in the area or light intrusion.

Shade and Shadow

The proposed project would not be expected to result in project-level significant impacts after mitigation has been incorporated. Potential shade and shadow impacts are directly related to the proximity of the project to adjacent uses. Potential shade and shadow impacts from the related projects, located up to 1 mile away from the proposed project, would not result in a cumulatively considerable impact. Each project would be required to mitigate any project-level impacts in accordance with the standards and design guidelines set forth in each respective jurisdiction. Therefore, the proposed project would result in a less than significant contribution to significant impacts related to cumulative shade and shadow.

Therefore, implementation of the proposed project would not be expected to result in significant cumulative impacts when considered with the related past, present, or reasonably foreseeable, probable future projects.

3.1.5 Mitigation Measures

Tier I

Measure Aesthetics-1

All exterior lighting proposed for building and on-site security lighting shall be shielded and directed downward to minimize the impacts on the surrounding land uses. No large expanses of reflective or otherwise glare-producing surfaces (such as windows or walls) would be included within the building components or materials.

Tier II

Measure Aesthetics-1

All exterior lighting proposed for building and on-site security lighting shall be shielded and directed downward to minimize the impacts on the surrounding land uses. No large expanses of reflective or otherwise glare-producing surfaces (such as windows or walls) would be included within the building components or materials.

Measure Aesthetics-2

The County of Los Angeles shall review all plans for the Tier II development. Contractors shall conform with all design features described in the Campus Planning and Programming Report, which is intended to serve as a guide for development at the project site to ensure visual consistency and continuity at the project site and within the surrounding area.

Measure Aesthetics-3

All development shall be limited to three stories in height if the proposed structure is located along the western or eastern edge of the property. The existing setback includes the pediatric modular building/ oasis clinic located approximately 14 feet from the property line along the eastern boundary at Wilmington Avenue, the Interns and Physicians Building at approximately 20 feet from the property line along the western boundary at Compton Avenue, the Hawkin's Building

located at approximately 30 feet from the property line along the northern boundary at 120th Street, and the Cooling Tower located at 44 feet from the property line along the south. Alternatively, if a structure exceeds three stories in height along the perimeter of the property (western or eastern perimeter only), at a minimum, the building shall be required to stay within the approximately 20-foot and for 14-foot existing campus respective western and eastern boundary setbacks to reduce shade and shadow impacts to adjacent land uses along Compton Avenue and Wilmington Avenue.

Measure Aesthetics-4

Where parking lots or structures are adjacent to residential areas or near other sensitive light receptors along the southern portion of the campus, Compton Avenue, and Wilmington Avenue, retaining walls and/or landscaping of sufficient height shall be incorporated into the design of the project to shield vehicle headlights (which typically sit at a minimum of 3 feet in height above ground). These project features shall be included in the landscape plans and final project design plans (to avoid and reduce potential light and glare obstructions that could impact residential areas).

3.1.6 Level of Significance after Mitigation

Tier I

The recommended mitigation measure Aesthetics-1 would be able to reduce project-specific impacts related to light and glare to below the level of significance.

Tier II

Implementation of mitigation measure Aesthetics-1 and Aesthetics-4 would be expected to prevent security lighting and building lighting from causing significant levels of light spillover or light trespass. Implementation of mitigation measure Aesthetics-4 would be expected to prevent vehicle highlights from causing significant levels of light intrusion. Finally, implementation of mitigation measure Aesthetics-3 and Aesthetics-4 would be expected to reduce impacts related to a new source of light and glare to below the level of significance.

Implementation of mitigation measures Aesthetics-2 and Aesthetics-3 would be expected to prevent potential building shadows from Tier II from causing significant levels of shade to spillover onto adjacent land uses including residences. Therefore, implementation of mitigation measures Aesthetics-2 and Aesthetics-3 would be expected to reduce impacts related to a new source of shadow to below the level of significance for the proposed Tier II project components.

Implementation of mitigation measure Aesthetics-2 would be expected to ensure consistency within the medical campus and with the surrounding area. As supported by project design guidelines listed in mitigation measure Aesthetics-1, the materials used to construct Tier II of proposed project would be consistent with existing visual quality conditions at the proposed project site and within the surrounding area, and would reduce potential impacts to visual character to below the level of significance.

3.2 AIR QUALITY

As a result of the Initial Study,[1] the County of Los Angeles (County) determined that the Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in significant impacts to air quality. Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts from air quality.

The analysis of air quality consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the proposed project area, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential for impacts to air quality has been analyzed in accordance with Appendix G of the State California Environmental Quality Act (CEQA) Guidelines[2] and the methodologies and significance thresholds provided by the County General Plan,[3] the National Ambient Air Quality Standards (NAAQS),[4] the California Ambient Air Quality Standards (CAAQS),[5] the Clean Air Act (CAA),[6] and the Air Quality Technical Impact Report prepared for the proposed project (Appendix C, *Air Quality and Greenhouse Gas Emissions Technical Impact Report*).[7]

Data on existing air quality in the South Coast Air Basin (Basin), in which the proposed project site is located, is monitored by a network of air monitoring stations operated by the California Environmental Protection Agency (Cal/EPA), the California Air Resources Board (CARB), and the South Coast Air Quality Management District (SCAQMD). The air quality assessment considers all phases of project planning, construction, and operation. The analysis of construction impacts was based on the construction scenario as described in Section 2.0, *Project Description*, of this EIR, as well as on a construction scenario for a project of comparable size and a construction schedule of comparable duration. The conclusions in this section reflect guidelines established by SCAQMD's *CEQA Air Quality Handbook* and guidance provided on the SCAQMD Web site.[8, 9]

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[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

[2] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[3] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[4] U.S. Environmental Protection Agency. Updated 14 July 2009. *National Ambient Air Quality Standards (NAAQS)*. Available at: http://www.epa.gov/air/criteria.html.

[5] Air Resources Board. Reviewed 24 November 2009. *California Ambient Air Quality Standards (CAAQS)*. Available at: http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm.

[6] U.S. Environmental Protection Agency. 2005. Federal Clean Air Act, Title I, Air Pollution Prevention and Control. Available at: http://www.epa.gov/oar/caa/contents.html

[7] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[8] South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

[9] South Coast Air Quality Management District. Accessed 6 July 2010. *Air Quality Analysis Guidance Handbook*. Web site. Available at: http://www.aqmd.gov/ceqa/hdbk.html

3.2.1 Regulatory Framework

This regulatory framework identifies the federal, state, regional, and local laws that govern the regulation of air quality and must be considered by the County regarding decisions on projects that involve construction, operation, or maintenance activities that would result in air emissions.

Responsibility for attaining and maintaining ambient air quality standards in California is divided between CARB and regional air pollution control or air quality management districts. Areas of control for the regional districts are set by CARB, which divides the state into air basins. These air basins are based largely on topography that limits air flow access, or by county boundaries. The proposed project area is located in the unincorporated area of Willowbrook, California, within the SCAQMD portion of the South Coast Air Basin.

Federal

Federal Clean Air Act

The Federal Clean Air Act (Federal CAA) requires that federally supported activities must conform to the State Implementation Plan (SIP), whose purpose is that of attaining and maintaining the NAAQS. Section 176 (c) of the Clean Air Act as amended in 1990, established the criteria and procedures by which the Federal Highway Administration (FHWA) (Title 23 USC), the Federal Transit Administrations (FTA),[10] and metropolitan planning organizations (MPOs) determine the conformity of federally funded or approved highway and transit plans, programs, and projects to SIPs. The provisions of 40 CFR Parts 51 and 93[11] apply in all non-attainment and maintenance areas for transportation-related criteria pollutants for which the area is designated non-attainment or has a maintenance plan.

The U.S. EPA sets NAAQS. Existing national standards are shown in Table 3.2.1-1, *Ambient Air Quality Standards,* together with state standards. Primary standards are designed to protect public health, including sensitive individuals such as the children and the elderly, whereas secondary standards are designed to protect public welfare, such as visibility and crop or material damage. The Clean Air Act requires the EPA to routinely review and update the NAAQS in accordance with the latest available scientific evidence. For example, the EPA revoked the annual PM_{10} standard in 2006 due to a lack of evidence linking health problems to long-term exposure to PM_{10} emissions. The 1-hour standard for O_3 was revoked in 2005 in favor of a new 8-hour standard that is intended to be more protective of public health.

[10] U.S. Environmental Protection Agency. 26 September 1996. "Approval and Promulgation of Implementation Plans and Redesignation of Puget Sound, Washington for Air Quality Planning Purposes: Ozone." In *Federal Register*, Volume 61, No. 188. Available at: http://yosemite.epa.gov/r10/airpage.nsf/283d45bd5bb068e68825650f0064cdc2/e1f3db8b006eff1a88256dcf007885c6/$FILE/61%20FR%2050438%20Seattle%20Tacoma%20Ozone%20MP.pdf

[11] U.S. Environmental Protection Agency. 15 August 1997. Transportation Conformity Rule Amendments: Flexibility and Streamlining. Available at: http://www.epa.gov/EPA-AIR/1997/August/Day-15/a20968.htm

TABLE 3.2.1-1
AMBIENT AIR QUALITY STANDARDS

	National		State
Air Pollutant	**Primary**	**Secondary**	**Standard**
Ozone (O_3)[1]	0.08 ppm, 8-hr avg. (1997) 0.075 ppm, 8-hr avg. (2008)	0.08 ppm, 8-hr avg. (1997) 0.075 ppm, 8-hr avg. (2008)	0.09 ppm, 1-hr avg. 0.07 ppm, 8-hr avg.
Carbon Monoxide (CO)	9 ppm, 8-hr avg. 35 ppm, 1-hr avg.	None	9 ppm, 8-hr avg. 20 ppm, 1-hr avg.
Nitrogen Dioxide (NO_2)	0.053 ppm, annual avg.	0.053 ppm, annual avg.	0.03 ppm, annual avg. 0.18 ppm, 1-hr avg.
Sulfur Dioxide (SO_2)	0.03 ppm, annual avg. 0.14 ppm, 24-hr avg.	0.5 ppm, 3-hr avg.	0.25 ppm, 1-hr 0.04 ppm, 24-hr avg.
Suspended Particulate Matter (PM_{10})	150 $\mu g/m^3$, 24-hr avg.	150 $\mu g/m^3$, 24-hr avg.	50 $\mu g/m^3$, 24-hr avg. 20 $\mu g/m^3$, annual avg.
Fine Particulate Matter ($PM_{2.5}$)	35 $\mu g/m^3$, 24-hr avg. 15 $\mu g/m^3$, annual avg.	35 $\mu g/m^3$, 24-hr avg. 15 $\mu g/m^3$, annual avg.	12 $\mu g/m^3$, annual avg.
Sulfates (SO_4)	—	—	25 $\mu g/m^3$, 24-hr avg.
Lead (Pb)	1.5 $\mu g/m^3$, calendar quarter 0.15 $\mu g/m^3$, rolling 3-month avg.	1.5 $\mu g/m^3$, calendar quarter 0.15 $\mu g/m^3$, rolling 3-month avg.	1.5 $\mu g/m^3$, 30-day avg.
Hydrogen Sulfide (H_2S)	—	—	0.03 ppm, 1-hr avg.
Vinyl Chloride	—	—	0.01 ppm, 24-hr avg.
Visibility-Reducing Particles	—	—	Extinction coefficient of 0.23 per kilometer — visibility of 10 miles or more (0.07--30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. (8-hr avg.)

NOTES:
1. The 1997 standard of 0.08 ppm will remain in place for implementation purposes as EPA undertakes rulemaking to address the transition to the 2008 ozone standard of 0.075 ppm.
2. ppm = parts per million by volume
3. avg. = average
4. μg/m3 = micrograms per cubic meter

SOURCES:

1. U.S. Environmental Protection Agency. Updated 14 July 2009. *National Ambient Air Quality Standards (NAAQS)*. Available at: http://www.epa.gov/air/criteria.html
2. California Air Resources Board. Reviewed 24 November 2009. *California Ambient Air Quality Standards (CAAQS)*. Available at: http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm

The 1990 Amendments to the CAA divide the nation into five categories of planning regions depending on the severity of their pollution and set new timetables for attaining the NAAQS. The categories range from "marginal" to "extreme." Attainment deadlines are from 3 to 20 years, depending on the category. The Basin as a whole is an extreme non-attainment area for ozone. The County is currently designated as a Severe-17 non-attainment area for O_3, a non-attainment area for $PM_{2.5}$, and a Serious non-attainment area for PM_{10},[12] but the Basin has achieved the federal 1-hour and 8-hour carbon monoxide (CO) air quality standards since 1990 and 2002, respectively, and the County has met the federal air quality standards for nitrogen dioxide (NO_2) since 1992.[13] Although the Basin as a whole is designated as a non-attainment area for particulate matter (PM_{10}), federal PM_{10} standards in the County are currently being met at all monitoring stations.[14]

Areas designated as Severe-17 for non-attainment of the federal 8-hour O_3 standard, such as the County, are required to reach attainment levels within 17 years after designation. Areas designated as "serious" for non-attainment of the federal PM_{10} air quality standard have a maximum of 10 years to reduce PM_{10} emissions to attainment levels. All non-attainment areas for $PM_{2.5}$ have 3 years after designation to meet the $PM_{2.5}$ standards. The Basin has until 2021 to achieve the 8-hour O_3 standards and 2010 to achieve the $PM_{2.5}$ air quality standards.[15] Section 182(e)(5) of the Federal CAA allows the EPA administrator to approve provisions of an attainment strategy in an "extreme" area that anticipates development of new control techniques or improvement of existing control technologies if the state has submitted enforceable commitments to develop and adopt contingency measures to be implemented if the anticipated technologies do not achieve planned reductions.

Non-attainment areas that are classified as "serious" or "worse" are required to revise their air quality management plans to include specific emission reduction strategies in order to meet interim milestones in implementing emission controls and improving air quality. The EPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the CAA. If a state fails to correct these planning deficiencies within two years of federal notification, the EPA is required to develop a federal implementation plan (FIP) for the identified non-attainment area or areas.

State

California Clean Air Act

The California CAA of 1988 requires all air-pollution control districts in the state to work to achieve and maintain state ambient air quality standards for O_3, CO, and NO_2 by the earliest practicable date and to develop plans and regulations specifying how they will meet this goal. There are no planning requirements for the state PM_{10} standard. The CARB, which became part of the Cal/EPA in 1991, is responsible for meeting state requirements of the Federal CAA, administrating the California CAA, and establishing the CAAQS. The California CAA, amended in 1992, requires all air districts in the state to endeavor to achieve and maintain the CAAQS. The CAAQS are generally stricter than national standards for the same pollutants, but there is no penalty for non-attainment. California has also established state standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles, for which there are no national standards (Table 3.2.1.1-1).

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[12] U.S. Environmental Protection Agency. 15 August 2008. *The Green Book Nonattainment Areas for Criteria Pollutants*. Available at: http://www.epa.gov/oar/oaqps/greenbk/

[13] South Coast Air Quality Management District. June 2007. *2007 Air Quality Management Plan*. Diamond Bar, CA.

[14] South Coast Air Quality Management District. June 2007. *2007 Air Quality Management Plan*. Diamond Bar, CA.

[15] South Coast Air Quality Management District. June 2007. *2007 Air Quality Management Plan*. Diamond Bar, CA.

Regional

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD), which monitors air quality within the proposed project area, has jurisdiction over an area of approximately 10,743 square miles and a population of over 16 million. The 1977 Lewis Air Quality Management Act created SCAQMD to coordinate air quality planning efforts throughout Southern California. This Act merged four (4) county air pollution agencies into one regional district to improve air quality in Southern California. SCAQMD is responsible for monitoring air quality as well as planning, implementing, and enforcing programs designed to attain and maintain Federal and State Ambient Air Quality Standards in the district. In addition, SCAQMD is responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or related stationary sources do not create net emission increases.

SCAQMD Rule 402, Nuisance, states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of Rule 402 do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

It is mandatory for all construction projects in the South Coast Air Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Amended on June 3, 2005, the Fugitive Dust Rule 403 requires actions to prevent, reduce, or mitigate fugitive dust emissions of particulate matter in the ambient air as a result of any anthropogenic activities that are capable of generating fugitive dusts.

On a regional level, SCAQMD and the Southern California Association of Governments (SCAG) have responsibility under state law to prepare the Air Quality Management Plan (AQMP), which contains measures to meet state and federal requirements. When approved by CARB and the U.S. EPA, the AQMP becomes part of the SIP.

The most recent update to the SCAQMD Air Quality Management Plan (AQMP) was prepared in order for air quality improvements to meet both state and federal CAA planning requirements for all areas under AQMP jurisdiction. This update was adopted by CARB for inclusion in the SIP on September 27, 2007. The AQMP sets forth strategies for attaining the federal PM_{10} and $PM_{2.5}$ air quality standards and the federal 8-hour O_3 air quality standard, as well as meeting state standards at the earliest practicable date. With the incorporation of new scientific data, emission inventories, ambient measurements, control strategies, and air quality modeling, the 2007 AQMP focuses on O_3 and $PM_{2.5}$ attainments.

Local

County of Los Angeles General Plan

The proposed project site is located within and owned by the County; therefore, development in the area is governed by the policies, procedures, and standards set forth in the County General Plan. The proposed project is considered as a capital facility for the County; therefore, pursuant to the Office

of Planning and Research (OPR's) guidelines for a general plan related to capital facilities, the proposed project must be consistent with the County General Plan.[16] In addition, the County is required to review the capital improvement programs to ensure their consistency with the General Plan.[17] The proposed project would be expected to be consistent with the County General Plan governing air quality and would not be expected to result in a change to the population growth assumption used by the SCAG for attainment planning. The County General Plan has developed goals and policies for improving air quality in the County. Many policies are transportation-based because of the direct link between air quality and the circulation element. The objectives and policies relevant to the proposed project and capable of contributing toward avoiding and reducing the generation of air pollutants include the following:[18]

- **Objective:** To support local efforts to improve air quality.
- **Policy:** Actively support strict air quality regulations for mobile and stationary sources, and continued research to improve air quality. Promote vanpooling, carpooling, and improved public transportation.

- **Objective:** To conserve energy resources and develop alternative energy sources.
- **Policy:** Support the conservation of energy and encourage the development and utilization of new energy sources including geothermal, thermal waste, solar, wind, and ocean-related sources.

3.2.2 Existing Conditions

3.2.2.1 South Coast Air Basin

The proposed project area is located in the South Coast Air Basin, which is composed of a 6,745-square-mile area encompassing all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The analysis of existing conditions related to air quality includes a summary of pollutant levels prior to implementation of each component of the proposed project. All of the proposed project components are located within the Basin; therefore, all air quality data and analysis are presented as an aggregate of the entire proposed project area.

The Basin is the subregion of SCAQMD and is in an area of high air pollution potentials due to its climate and topography. The climate of the proposed project area (i.e., the Basin) is characterized by warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This mild climatological pattern is interrupted infrequently by extremely hot summers, winter storms, or Santa Ana winds. The Basin is a coastal plain bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. During the dry season, the Eastern Pacific High-Pressure Area (a semi-permanent feature of the general hemispheric circulation pattern) dominates the weather over much of Southern California, resulting in a mild climate tempered by cool sea breezes with light average wind speed. High mountains surround the rest of the Basin's perimeter, contributing to the variation of rainfall, temperature, and winds in the Basin.

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[16] California Governor's Office of Planning and Research. October 2003. *General Plan Guidelines*. Available at: http://www.opr.ca.gov/planning/publications/General_Plan_Guidelines_2003.pdf

[17] California Governor's Office of Planning and Research. October 2003. *General Plan Guidelines*. Available at: http://www.opr.ca.gov/planning/publications/General_Plan_Guidelines_2003.pdf

[18] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

3.2.2.2 Temperature Inversions

The Basin frequently experiences temperature inversions, a condition characterized by an increase in temperature with an increase in altitude. In a normal atmosphere, temperature decreases with altitude. In a temperature inversion condition, as the pollution rises, it reaches an area where the ambient temperature exceeds the temperature of the pollution, thereby limiting vertical dispersion of air pollutants and causing the pollution to sink back to the surface, trapping it close to the ground. During the summer, the interaction between the ocean surface and the low layer of the atmosphere creates a marine layer. With an upper layer of warm air mass over the cool marine layer, air pollutants are prevented from dispersing upward. Additional air quality problems in the Basin can be attributed to the bright sunshine, which causes a reaction between hydrocarbons and oxides of nitrogen to form ozone. Peak ozone concentrations in the Basin over the past two decades have occurred at the base of the mountains around Azusa and Glendora in the County and at the crestline in the mountain area above the City of San Bernardino. Both the peak ozone concentrations and the number of days the standards were exceeded decreased everywhere in the Basin throughout the 1990s. During the fall and winter, the greatest pollution problems are CO and NO_x emissions, which are trapped and concentrated by the inversion layer. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.). In the morning, CO levels are relatively high due to cold temperatures and the large number of cars traveling. High CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the Basin are associated with heavy traffic. However, CO concentrations have also dropped significantly throughout the Basin as a result of strict new emission controls and reformulated gasoline sold in winter months. NO_2 levels are also generally higher during fall and winter days.

3.2.2.3 Climatic Conditions

The annual average temperature, as recorded at the Los Angeles Civic Center (8.6 miles north of the proposed project site at 34° 03′ N, 118° 14′ W), is 65 degrees Fahrenheit (°F) with an average winter (December, January, and February) temperature of approximately 58°F and an average summer (June, July, and August) temperature of approximately 72°F. The average maximum recorded temperatures are 81°F during the summer and 67°F during the winter.[19] The annual average of total precipitation in the proposed project area is approximately 15 inches, which occurs mostly during the winter and relatively infrequently during the summer. Precipitation averages approximately 9.0 inches during the winter, approximately 3.7 inches during the spring (March, April, and May), approximately 2.0 inch during the fall (September, October, and November), and approximately 0.1 inch during the summer.[20] The average wind speed within the proposed project area and its vicinity, as recorded in 1981 at the Lynwood Wind Monitoring Station (1.7 miles east northeast of the proposed project site at 11220 Long Beach Boulevard in the City of Lynwood), is approximately 4.1 miles per hour (MPH), which blows predominantly from the southwest direction.[21] Calm winds occur approximately 17 percent of the time.[22] Winds in the Basin are generally light, tempered by afternoon sea breezes.

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[19] Western Regional Climate Center. Updated 12 November 2009. "Western U.S. Climate Historical Summaries." Web site. Available at: http://www.wrcc.dri.edu/Climsum.html

[20] Western Regional Climate Center. Updated 12 November 2009. "Western U.S. Climate Historical Summaries." Web site. Available at: http://www.wrcc.dri.edu/Climsum.html

[21] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[22] South Coast Air Quality Management District. Updated 21 May 2009. AQMD Meteorological Data for Dispersion Model

Severe weather is uncommon in the Basin, but strong easterly winds known as the Santa Ana winds can reach 25 to 35 MPH below the passes and canyons. During the spring and summer months, air pollution is carried out of the region through mountain passes in wind currents or is lifted by the warm vertical currents produced by the heating of the mountain slopes. From the late summer through the winter months, because of the average lower wind speeds and temperatures in the proposed project area and its vicinity, air contaminants do not readily disburse, thus trapping air pollution in the area.

3.2.2.4 Emission Sources

The proposed project area currently contains buildings, structures, and other built features. Emissions are generated daily from the hospital facilities by landscape maintenance equipment, campus operations including but not limited to space and water heating, and vehicle trips to and from the proposed project site.

3.2.2.5 Community of Willowbrook Air Quality

Existing air quality within the unincorporated area of Willowbrook and its vicinity is characterized by a mix of local emission sources that include stationary activities, such as space and water heating, landscape maintenance, consumer products, and mobile sources, which includes primarily automobile and truck traffic. Motor vehicles are the primary source of pollutants within the proposed project vicinity, because they have the potential to generate localized levels of CO, termed as CO "hotspots." Section 9.4 of SCAQMD's *CEQA Air Quality Handbook* identifies CO as a localized problem requiring additional analysis when a proposed project is likely to expose sensitive receptors to CO hotspots.[23]

3.2.2.6 Source Receptor Area

The SCAQMD has divided the Basin into source receptor areas (SRAs), based on similar meteorological and topographical features. The proposed project site is located in SCAQMD's Southeast Los Angeles County SRA 12, which is served by the Lynwood Monitoring Station, which is located 1.7 miles east northeast of the proposed project site at 11220 Long Beach Boulevard in the City of Lynwood. Criteria pollutants monitored at the Lynwood Monitoring Station include O_3, CO, $PM_{2.5}$, and NO_2. This station does not monitor PM_{10} or SO_2. The nearest, most representative monitoring station that gathers PM_{10} and SO_2 data is located approximately 9.6 miles north of the proposed project site in the Central Los Angeles County Subregion (No. 1) at 1630 North Main Street, Los Angeles. The ambient air quality data in the proposed project vicinity as recorded at the Lynwood and Los Angeles-North Main Street Monitoring Stations from 2006 to 2008 and the applicable state standards are shown in Table 3.2.2.6-1, *Summary of 2006–2008 Ambient Air Quality Data in the Project Vicinity*.

Application. Available at: http://www.aqmd.gov/smog/metdata/MeteorologicalData.html

[23] South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

TABLE 3.2.2.6-1
SUMMARY OF 2006–2008 AMBIENT AIR QUALITY DATA IN THE PROJECT VICINITY

Pollutants	Pollutant Concentration & Standards	Number of Days Above State Standard		
		2006	2007	2008
Ozone	Maximum 1-hr Concentration (ppm)	0.09	0.10	0.08
	Days > 0.09 ppm (State 1-hr standard)	0	1	0
	Maximum 8-hr Concentration (ppm)	0.07	0.08	0.06
	Days > 0.07 ppm (State 8-hr standard)	0	2	0
Carbon Monoxide	Maximum 1-hr Concentration (ppm)	8	8	6
	Days > 20 ppm (State 1-hour standard)	0	0	0
	Maximum 8-hr Concentration (ppm)	6.4	5.1	4.3
	Days > 9.0 ppm (State 8-hr standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hr Concentration (ppm)	0.14	0.10	0.12
	Days > 0.18 ppm (State 1-hr standard	0	0	0
PM_{10}	Maximum 24-hr Concentration ($\mu g/m^3$)	59	78	66
	Days > 50 $\mu g/m^3$ (State 24-hr standard)	3	5	2
$PM_{2.5}$	Maximum 24-hr Concentration ($\mu g/m^3$)	55.0	49.0	44.2
	Exceed State Standard (12 $\mu g/m^3$ Annual Arithmetic Mean)?	Yes	Yes	Yes
Sulfur Dioxide	Maximum 24-hr Concentration (ppm)	0.006	0.003	0.002
	Days > 0.25 ppm (State 24-hr standard)	0	0	0

SOURCE: South Coast Air Quality Management District. Accessed on 4 December 2009. *Historical Data by Year*. Available at: http://www.aqmd.gov/smog/historicaldata.htm
Background CO concentration in the proposed project area is established because CO concentrations are typically used as an indicator of the conformity with CAAQS, and estimated changes in CO concentrations generally reflect operational air quality impacts associated with the project. The highest reading of the CO concentrations over the past three years is defined by SCAQMD as the background level. A review of data from the Lynwood Monitoring Station from the 2006 to 2008 period indicates that the maximum 1- and 8-hour background concentrations are approximately 8 and 6.4 parts per million (ppm), respectively. The existing 1- and 8-hour background concentrations do not exceed the State CO standards of 20 ppm and 9.0 ppm, respectively.

3.2.2.7 Sensitive Receptors

Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, the elderly over 65 years of age, and children under 14, are particularly sensitive to certain pollutants. Facilities and structures where these sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses identified to be sensitive receptors by SCAQMD in the CEQA Handbook include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive receptors may be at risk of being affected by air emissions released from the construction and operation of the proposed project. The greatest potential for exposure of sensitive receptors to air contaminants would occur during the temporary construction phase, when potentially contaminated soil would be uncovered and equipment would be used for site grading, materials delivery, and building construction.

The proposed project would be located in the unincorporated area of Willowbrook, near existing residences and commercial facilities. Exposure to potential emissions would vary substantially from

day to day, depending on the amount of work being conducted, the weather conditions, the location of receptors, and the length of time that receptors would be exposed to air emissions. The construction phase emissions estimated in this analysis are based on conservative estimates and worst-case conditions, with maximum levels of construction activity occurring simultaneously within a short period of time. The nearest sensitive receptors, located within a 0.5-mile radius of the proposed project site consisting of school land uses, with the highest potential to be impacted by the proposed project are listed below in Table 3.2.2.7-1, *Sensitive Receptor Locations*.

TABLE 3.2.2.7-1
SENSITIVE RECEPTOR LOCATIONS

	Receptor Name	Location	Distance from Site
1	King Drew Magnet High School	1601 East 120th Street, Los Angeles 90059	Adjacent to the northwest boundary
2	Lincoln Drew Elementary and Headstart	1667 East 118th Street, Los Angeles 90059	0.10 mile north
3	Carver Elementary	1425 East 120th Street, Los Angeles 90059	0.21 mile west
4	Harriet Tubman High School	12501 South Wilmington Avenue, Compton 90222	0.25 mile south
5	Cesar Chavez Alternative School and Compton Community Day Middle School	12051 South Wilmington Avenue, Compton 90222	0.25 mile south
6	New Designs Charter School	1339 East 120th Street, Los Angeles 90059	0.28 mile northwest
7	Los Angeles Computer Science Academy	2209 East 118th Street, Los Angeles 90059	0.36 mile northeast
8	Ronald E. Mc Nair Elementary	1450 West El Segundo Boulevard, Compton, 90222	0.41 mile south
9	Martin Luther King Elementary	2270 East 122nd Street, Compton 90222	0.43 mile east
10	Willowbrook Middle School	2601 North Wilmington Avenue, Compton 90222	0.47 mile south

Additional single-family and multi-family residences are located in the surrounding community, within 0.25 mile (1,320 feet) of the proposed project site.

3.2.3 Significance Thresholds

The proposed project's air quality impacts can be separated into short-term impacts due to construction and long-term or permanent impacts from project operation. Both types of impacts may occur on a local or regional scale. The potential for the proposed project to result in impacts related to air quality was analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines. Would the proposed project:

- Conflict with or obstruct implementation of the applicable air quality plan;

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;

- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including release in emissions which exceed quantitative thresholds for ozone precursor);

- Expose sensitive receptors to substantial pollutant concentrations; or

- Create objectionable odors affecting a substantial number of people.

The County relies on significance thresholds recommended by the SCAQMD in its *CEQA Air Quality Handbook*, as revised in November 1993 and approved by the SCAQMD's Board of Directors in order to determine whether projects will have significant impacts to air quality.[24] The SCAQMD's emission thresholds apply to all federally regulated air pollutants except lead, which is not exceeded in the Basin.

The SCAQMD is currently in the process of preparing a new air quality handbook, *AQMD Air Quality Analysis Guidance Handbook*. Supplemental details related to air quality analysis are available online at SCAQMD's Web site.[25] Proposed chapters will be posted there as they become available. The revisions completed to date make no change in significance thresholds or analysis methodology.

3.2.3.1 Construction Phase Significance Criteria

The significance criteria for the construction phase of the proposed project include the following:

- SCAQMD regional construction emission thresholds for CO, volatile organic compounds (VOCs), NO_x, SO_x, $PM_{2.5}$, and PM_{10} as presented in Table 3.2.3.1-1, *SCAQMD Daily Construction Emission Thresholds of Significance*;

- Emissions of Toxic Air Contaminants (TACs) including carcinogens and non-carcinogens - Maximum Incremental Cancer Risk $\geq$ 10 in 1 million; Hazard Index $\geq$1.0 (project increment); and

- Odor nuisance pursuant to SCAQMD's Rule 402.

[24] South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

[25] South Coast Air Quality Management District. Accessed 6 July 2010. *Air Quality Analysis Guidance Handbook*. Web site. Available at: http://www.aqmd.gov/ceqa/hdbk.html

TABLE 3.2.3.1-1
SCAQMD DAILY CONSTRUCTION EMISSION THRESHOLDS OF SIGNIFICANCE

Criteria Air Pollutant	Project Construction (lbs/day)
Carbon monoxide (CO)	550
Volatile organic compounds (VOCs)	75
Nitrogen oxides (NO_x)	100
Sulfur oxides (SO_x)	150
Fine particulates ($PM_{2.5}$)	55
Particulates (PM_{10})	150

SOURCES: South Coast Air Quality Management District, 1993.
South Coast Air Quality Management District. Accessed July 6, 2010. Air Quality Analysis Guidance Handbook. Web site. Available at: http://www.aqmd.gov/ceqa/hdbk.html

3.2.3.2 Operational Phase Significance Criteria

The significance criteria for the operational phase of Tier I and Tier II of the proposed project include the following:

- Daily SCAQMD operational emissions thresholds for CO, VOCs, NO_x, SO_x, $PM_{2.5}$, and PM_{10} as presented in Table 3.2.3.2-1, *SCAQMD Daily Operational Emission Thresholds of Significance*;

- The CAAQS for the 1- and 8-hour periods of CO concentrations of 20 ppm and 9.0 ppm, respectively. If CO concentrations currently exceed the CAAQS, then an incremental increase of 1.0 ppm over "no project" conditions for the 1-hour period would be considered a significant impact. An incremental increase of 0.45 ppm over the "no project" conditions for the 8-hour period would be considered significant;

- Emissions of TACs; and

- Odor nuisance pursuant to SCAQMD's Rule 402.

TABLE 3.2.3.2-1
SCAQMD DAILY OPERATIONAL EMISSION THRESHOLDS OF SIGNIFICANCE

Criteria Air Pollutant	Project Operation (lbs/day)
Carbon monoxide (CO)	550
Volatile organic compounds (VOCs)	55
Nitrogen oxides (NO_x)	55
Sulfur oxides (SO_x)	150
Fine particulates ($PM_{2.5}$)	55
Particulates (PM_{10})	150

SOURCES: South Coast Air Quality Management District, 1993.
South Coast Air Quality Management District. Accessed July 6, 2010. Air Quality Analysis Guidance Handbook. Web site. Available at: http://www.aqmd.gov/ceqa/hdbk.html

3.2.4 Impact Analysis

This section analyzes the potential for significant impacts to air quality that would occur from implementation of the proposed project. Air quality impacts of a project generally fall into four major categories:

(1) *Construction Impacts* -- temporary impacts, including airborne dust from grading, demolition, and dirt hauling and gaseous emissions from heavy equipment, delivery and dirt hauling trucks, employee vehicles, and paints and coatings.

Construction emissions vary substantially from day to day, depending on the level of construction phase and weather conditions.

(2) *Operational Regional Impacts* -- primarily gaseous emissions from natural gas and electricity usage and vehicles traveling to and from a project site.

(3) *Operational Local Impacts* -- increases in pollutant concentrations, primarily carbon monoxide, resulting from traffic increases in the immediate vicinity of a project, as well as any toxic and odor emissions generated on site.

(4) *Cumulative Impacts* -- air quality changes resulting from the incremental impact of the project when added to other projects in the vicinity

3.2.4.1 Assessment Methods and Models

Among the modeling tools recommended by SCAQMD, four (4) tools, CALINE4, URBEMIS, EMFAC, and AERMOD, were used to quantitatively evaluate the proposed project's potential impacts to criteria pollutant emission levels.

CALINE4

The SCAQMD recommends that a CO hotspots analysis with CALINE4 be performed if a project results in increasing congestion whereby the LOS of an intersection is changed from C to D or if there is a two percent increase in the volume to capacity ratio of any intersection rated D or worse. As it is anticipated that the proposed project would result in an increase in congestion that would result in a LOS of D or worse at several of the analyzed intersections prior to implementation of traffic mitigation measures, CO hotspots analysis was performed based on a simplified CALINE4 screening procedure developed by the Bay Area Air Quality Management District and accepted by the SCAQMD. This simplified procedure is intended as a screening method that identifies potential CO hotspots. The CALINE4 screening method was used for the six intersections that would experience the greatest increases in traffic volumes as a result of the proposed project. In order to obtain the most conservative results, it was assumed that sensitive receptors were located at the edge of each roadway. For each intersection analyzed, roadway-specific CO emissions calculated from peak-hour traffic volumes were added to the background CO concentrations. The emission factors used in the CALINE4 calculations were from the EMFAC 2007 model.

URBEMIS Model

The methodology used to analyze construction and operational air quality impacts is consistent with the methods described in the 1993 *CEQA Air Quality Handbook*.[26] The CARB URBEMIS 2007, version 9.2.4, was used to estimate construction emissions from the demolition of up to four buildings (the existing Multi-service Ambulatory Care Center (MACC) Building, Emergency Room, Storage Building, and Cooling Towers) and the construction of approximately 156,700 square feet of new buildings during Tier I and up to approximately 1,814,696 square feet of new buildings during Tier II, although it is understood that the net new development proposed on the campus is less than the approximately 1.8 million square feet. URBEMIS is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, and office buildings; area sources such as gas appliances, wood stoves, fireplaces, and landscape maintenance equipment; and construction projects. The URBEMIS 2007 model directly calculates VOCs, NO_x, CO, SO_2, PM_{10}, $PM_{2.5}$, and CO_2 emissions. SCAQMD regional significance thresholds were used to compare the project's regional construction emission impacts to determine project significance. URBEMIS 2007, version 9.2.4, was also used to analyze the proposed project's operational emissions, which would likely result from the vehicle trips to and from the proposed project site, and area source emissions, which would likely result from natural gas combustion and landscaping activities within the vicinity of the proposed project site. Because the proposed project site does not contain an industrial component that is considered a lead emission source, the concentrations and emissions of lead were not analyzed for the proposed project. The URBEMIS 2007 model was used for analysis of construction impacts to air quality based on the construction scenario described as an element of Section 2.0, *Project Description*, of this EIR.

EMFAC 2007 Model

The CARB Emissions Factors (EMFAC) 2007 model, version 2.3, was used to evaluate the proposed project's air pollutant emissions contributed by mobile sources, such passenger cars, based on the expected vehicle fleet mix, vehicle speeds, commute distances, and temperature conditions for the estimated start date of the proposed project. The EMFAC 2007, version 2.3, which is embedded within the URBEMIS 2007 model, includes emission factors for criteria pollutants. In this analysis, fleet mix, vehicle speeds, commute distances, and temperature conditions were based on the default values in the URBEMIS 2007 and EMFAC 2007 models.[27]

AERMOD

According to SCAQMD's localized significance threshold (LST) methodology, projects greater than 5 acres in size require air quality dispersion modeling to determine whether construction activities would cause or contribute to adverse localized air quality impacts. The criteria pollutants that are required to be analyzed are NO_x, CO, and PM. The two principal components of NO_x are NO_2 and NO, with the vast majority of NO_x emissions existing as NO. However, due to the adverse health effects that are associated with NO_2, the analysis of air quality impacts assumes all NO_x emissions are NO_2 for the purpose of modeling a worst-case scenario.

AMS/EPA Regulatory Model Improvement Committee, AERMIC Model (AERMOD) atmospheric dispersion model can be used for modeling the potential impacts of point, area, or volume sources

[26] South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

[27] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

in simple (i.e., flat) and complex (i.e., hilly) terrain. This program uses Gaussian dispersion to determine concentration of pollutants from sources based on available meteorological data. It is an accepted mathematical estimate of pollutant levels based on distance from a point source and physical conditions of equipment, site, and weather conditions. The model is limited to an approximate 50 kilometer radius, and the units of output are micrograms per cubic meter. This model was used to analyze the proposed project's short term construction emission impacts on sensitive receptors.

Development of Tier II of the proposed project would occur over the course of 10 years. Construction activities would either occur within localized areas or concurrently at more than one development area within the 38-acre site. For the purposes of conducting conservative air quality dispersion modeling, it was assumed that the proposed project site would consist of 8 separate, approximately 5-acre development areas for Tier II, as well as the specific, known area for Tier I development within the proposed project site.[28] Each development area was modeled based on the worst-case daily emission scenario for each pollutant.[29]

In accordance with SCAQMD's LST methodology, volume sources were set up to model the combustion emissions from construction equipment and area sources were set up to model the fugitive dust emissions from grading activities. Meteorological data provided by SCAQMD for the Lynwood monitoring station was used to run the dispersion model for the proposed project.

Estimated peak concentrations of NO_2 and CO generated by construction activities were added to the respective ambient concentrations to determine significance. The current peak background concentrations for NO_2, 1-hour CO, and 8-hour CO are 0.12, 6, and 4.3, respectively. Consistent with SCAQMD LST methodology, due to the fact that the Basin is currently in non-attainment for $PM_{2.5}$ and PM_{10}, the peak concentrations of $PM_{2.5}$ and PM_{10} generated by AERMOD were not added to the existing background concentrations, but instead were compared directly to the SCAQMD thresholds of significance.

Dispersion modeling was not required for the operational phase of the proposed project as the main source of criteria pollutants during operation is expected to be mobile source emissions, which would not be considered to be localized impacts as they would be spread out along roadways throughout the area. SCAQMD recommends applying the LST methodology to the operational phase of a project, only if a project includes mobile sources that would spend long periods of time idling at the site, such as warehouse/transfer facilities, or stationary sources, such as boilers or combustion units.[30]

Although the campus currently contains an existing Central Plant, the proposed project would not increase the capacity of the Central Plant and would not add additional components or equipment. The proposed project does include improvements to the Central Plant, including replacing certain components with more efficient equipment that would be expect to reduce water and salt use. The existing Central Plant currently uses and would continue to use Refrigerant-134, but there would be no anticipated increases in emissions as a result of the proposed project. Due to the fact that the emissions of the Central Plant are an existing condition, no dispersion modeling is required for the proposed project.

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[28] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[29] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[30] SCAQMD. February 2005. Final Sample Construction Scenario Report.

3.2.4.2 Construction Impacts

During construction of the proposed project, there is a potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the proposed project site. The proposed project is anticipated to be developed as described in Section 2.0, *Project Description*, of this EIR. The timeline for construction of the different buildings at the proposed project site would result in the likelihood of overlapping construction activities. Potential emission estimates from construction activities are based on emission factors and construction scenario information for development at the proposed project site. The total amount of construction, including duration and level of construction activity occurring at the proposed project site, would influence the estimated construction emissions and resulting potential impacts. The emission forecasts are therefore based on conservative assumptions about the construction scenario, with a large amount of construction activity occurring in a relatively short time frame. In addition, worker commute trips would vary throughout the construction period. Estimates included in this analysis include the highest potential worker commute trips. Due to the conservative nature of these assumptions, actual emissions from the individual construction projects would most likely be less than the estimates forecasted.

Construction emissions are expected to result from the following activities:

- Demolition of existing structures
- Site grading
- Soil removal
- Delivery and hauling of construction materials and equipment
- Fuel combustion by on-site construction equipment
- Construction worker commute trips
- Application of architectural coatings
- Asphalt operations

The proposed project would include the demolition of up to four buildings. The primary air pollutants emitted during demolition of existing structures and site preparation (i.e., site excavation, grading, and soil removal) activities would be fugitive dust emissions. The delivery and hauling of construction materials and equipment, the use of heavy-duty construction equipment, and the construction workers' commute trips from and to the proposed project site would primarily result in NO_x emissions. During the application of architectural coating and asphalt paving operations, VOCs would likely be released. The construction air impacts assessment considers each of these potential emission sources; however, the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions can contribute to substantial variations in daily construction emissions.

The demolition of the structures shall be preceded by asbestos abatement, as necessary. The contractor shall comply with requirements of SCAQMD Rule 1403 regarding asbestos control during demolition. This rule ensures that if there is any asbestos present in the buildings scheduled for demolition, it is removed and encapsulated prior to demolition so that no asbestos fibers are released. The SCAQMD *CEQA Air Quality Handbook* (1993 edition) states that asbestos emissions from a project are fully mitigated and do not present a significant impact when the project is in compliance with Rule 1403. In addition, should any contamination be found to be present in the soils in the area exposed after demolition, construction shall stop and appropriate health and safety procedures and agency coordination shall be undertaken prior to continuing work on site.

Tier I

Daily regional construction emissions were estimated by using the URBEMIS 2007 emissions model for the construction scenario for Tier I (Table 3.2.4.2-1, *Tier I: Unmitigated Estimated Daily Regional Construction Emissions)*.[31] The daily regional construction emissions associated with the proposed project's construction activities for Tier I would not be expected to exceed the SCAQMD regional significance thresholds. Construction of Tier I is currently projected to take approximately 37 months in total. Therefore, regional construction impacts related to the emission of criteria pollutants would be expected to be below the level of significance.

TABLE 3.2.4.2-1
TIER I: UNMITIGATED
ESTIMATED DAILY REGIONAL CONSTRUCTION EMISSIONS

	Construction Emissions (Pounds/Day)					
Construction Phase	**VOCs**	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
Demolition	3	21	13	0	1	1
Mass Site Grading	7	79	33	<1	9	29
Trenching	4	31	20	0	2	2
Building Construction[1]	10	81	42	<1	3	3
Paving	2	14	11	0	1	1
Architectural Coating	74	<1	0	0	<1	0
90 worker trips	<1	1	6	<1	<1	1
Maximum Regional Total	**74**	**82**	**48**	<1	**9**	**30**
SCAQMD Daily Significance Threshold (Pounds/Day)	**75**	**100**	**550**	**150**	**55**	**150**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

It is mandatory for all construction projects in the South Coast Air Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Amended on June 3, 2005, the Fugitive Dust Rule 403 requires actions to prevent, reduce, or mitigate fugitive dust emissions of particulate matter in the ambient air as a result of any anthropogenic activities that are capable of generating fugitive dusts. Compliance with Rule 403 would reduce regional PM_{10} emissions associated with grading activities by at least 60 percent.[32]

Toxic air contaminant (TAC) impacts at the proposed project site would primarily result from diesel particulate emissions associated with heavy-duty equipment operations and have been analyzed by using the standard health risks assessment methodology to determine "Individual Cancer Risk" of a person continuously exposed to TACs over a 70-year lifetime. Due to the relatively short-term construction schedule of approximately 37 months, construction-related TAC emissions due to construction of Tier I of the proposed project would be expected to be below the level of significance.

Odor impacts at the proposed project site would primarily result from equipment exhaust, application of architectural coatings, and asphalt operation. However, since odors are normally localized and would be confined to the proposed project site, an odor nuisance is not likely to happen. The

[31] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[32] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

construction of the proposed project would use typical construction equipment, and odors at the proposed project site would be typical for most construction sites. In addition, construction of the proposed project is required to comply with SCAQMD Rule 402; therefore, odor impacts resulting from construction activities for Tier I of the proposed project would be expected to be below the level of significance.

In order to determine impacts upon sensitive receptors, SCAQMD Sample LST Spreadsheets were used for the daily maximum emissions generated by a construction worst-case scenario for each phase of construction. The maximum localized emissions were then inputted into AEMOD for dispersion modeling.[33] The results of the dispersion modeling indicated the unmitigated construction-related air quality emissions of CO and $PM_{2.5}$ would be below the level of significance at the nearest sensitive receptors to the proposed project, but that emissions of NO_x would have the potential to be above the level of significance at the nearest sensitive receptors prior to implementation of mitigation measures.[34] Based on the dispersion modeling results, PM_{10} emissions at all sensitive receptors would be below the level of significance.

Tier II

Daily regional construction emissions were estimated by using the URBEMIS 2007 emissions model for the construction scenario for Tier II (Table 3.2.4.2-2, *Tier II: Unmitigated Estimated Daily Regional Construction Emissions)*.[35] The daily regional construction emissions associated with the proposed project's construction activities for Tier II would be expected to exceed the SCAQMD regional significance thresholds for VOCs and NO_x due to the potential for overlap of the construction phases. Therefore, regional construction impacts related to the emission of criteria pollutants would be expected to be above the level of significance.

[33] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[34] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[35] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

TABLE 3.2.4.2-2
TIER II: UNMITIGATED
ESTIMATED DAILY REGIONAL CONSTRUCTION EMISSIONS

Year	Maximum Construction Emissions (Pounds/Day)					
	VOCs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
2010	7	79	34	<1	9	29
2011	16	156	75	<1	11	32
2012	25	217	111	<1	14	34
2013	94	207	116	<1	13	34
2014	94	185	112	<1	12	33
2015	93	166	108	<1	11	32
2016	90	148	105	<1	10	31
2017	88	131	102	<1	10	31
2018	85	118	99	<1	4	5
2019	80	70	65	<1	3	3
2020	76	31	32	<1	1	1
150 worker trips	1	1	7	<1	<1	2
Maximum Regional Total	95	218	123	<1	14	36
SCAQMD Daily Significance Threshold (Pounds/Day)	**75**	**100**	**550**	**150**	**55**	**150**
Significant?	**Yes**	**Yes**	**No**	**No**	**No**	**No**

It is mandatory for all construction projects in the South Coast Air Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Amended on June 3, 2005, the Fugitive Dust Rule 403 requires actions to prevent, reduce, or mitigate fugitive dust emissions of particulate matter in the ambient air as a result of any anthropogenic activities that are capable of generating fugitive dusts. Compliance with Rule 403 would reduce regional PM_{10} emissions associated with grading activities by at least 60 percent.[36]

Toxic air contaminant impacts at the proposed project site would primarily result from diesel particulate emissions associated with heavy-duty equipment operations and have been analyzed by using the standard health risks assessment methodology to determine "Individual Cancer Risk" of a person continuously exposed to TACs over a 70-year lifetime. Construction of the proposed project is anticipated to occur within a 10-year time period. Despite the relatively long time frame currently set for construction activities for Tier II, construction equipment would not be anticipated to operate every day throughout the 10-year timeframe. It is anticipated that construction would occur in distinct phases, between which would be periods of inactivity. In addition, the USEPA adopted low sulfur diesel fuel standards in 2006, which reduce the TAC emissions from diesel engines. Therefore, construction-related TAC emissions of the proposed project would be expected to be below the level of significance.

Odor impacts at the proposed project site would primarily result from equipment exhaust, application of architectural coatings, and asphalt operation. However, since odors are normally localized and would be confined to the proposed project site, an odor nuisance is not likely to happen. The construction of the proposed project would use typical construction equipment, and odors at the

[36] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

proposed project site would be typical for most construction sites. In addition, construction of the proposed project is required to comply with SCAQMD Rule 402; therefore, odor impacts resulting from construction activities of the proposed project would be expected to be below the level of significance.

Due to the large amount of construction activities required for complete build-out of Tier II of the proposed project, sensitive receptors would have the potential be expected to be significantly affected by emissions of criteria pollutants. SCAQMD Sample LST Spreadsheets were used for the daily maximum emissions generated by a construction worst-case scenario for each phase of construction that were inputted into AEMOD for dispersion modeling.[37] The results of the dispersion modeling indicated the unmitigated construction-related air quality emissions of CO would be below the level of significance at the nearest sensitive receptors to the proposed project, but that emissions of NO_x, $PM_{2.5}$, and PM_{10} would be above the level of significance at the nearest sensitive receptors.[38]

In order to determine impacts upon sensitive receptors, SCAQMD Sample LST Spreadsheets were used for the daily maximum emissions generated by a construction worst-case scenario for each phase of construction. The maximum localized emissions were then inputted into AEMOD for dispersion modeling.[39] The results of the dispersion modeling indicated the unmitigated construction-related air quality emissions of CO and would be below the level of significance at the nearest sensitive receptors to the proposed project, but that emissions of NO_x, $PM_{2.5}$, and PM_{10} would have the potential to be above the level of significance at the nearest sensitive receptors prior to implementation of mitigation measures.[40]

3.2.4.3 Operational Impacts

Operational Regional Impacts

The URBEMIS 2007 model was used to calculate emissions from mobile and area sources. Mobile source emissions in the URBEMIS 2007 emissions model are based on the EMFAC 2007, version 2.3, emission inventory model, which projects emission estimates based upon the expected vehicle fleet mix for the estimated start date of the project, the vehicle speed and distance assumptions, and temperature conditions.

Tier I

Tier I of the proposed project would not be anticipated to have significant impacts to air quality during operation. Completion of Tier I of the proposed project would result in a decrease in square footage of facilities on the campus compared to existing conditions and a corresponding reduction in vehicle trips to and from the site.[41] Therefore, Tier I of the proposed project would be responsible for a

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[37] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[38] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[39] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[40] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[41] Raju Associates, Inc. July 2010. *Traffic Study for Martin Luther King, Jr. Medical Center Campus Redevelopment Project*. Pasadena, CA.

reduction in emissions related to mobile source emissions (Table 3.2.4.3-1, *Estimated Daily Operational Emissions)*. Therefore, there would be no expected significant regional impacts due to operation of Tier I of the proposed project.

TABLE 3.2.4.3-1
ESTIMATED DAILY OPERATIONAL EMISSIONS

Emission Sources	Air Pollutants (Pounds/Day)					
	VOCs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
Tier I Mobile Sources	-27	-34	-308	0	-13	-68
Tier II Mobile Sources	93	105	1,020	2	66	339
Total Mobile Sources	**66**	**71**	**712**	**2**	**53**	**271**
Area Sources	9	10	10	0	<1	<1
Total Emissions	**75**	**81**	**722**	**2**	**53**	**271**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**55**	**150**
Exceedance of Significance?	**Yes**	**Yes**	**Yes**	**No**	**No**	**Yes**

Tier II

Tier II of the proposed project would be anticipated to have significant impacts to air quality during operation. Long-term operational air emissions at the proposed project site are likely to result from both stationary sources (i.e., area sources from natural gas combustion, central plant, and landscape maintenance equipment) and mobile sources. It is anticipated that Tier II of the proposed project would generate approximately 24,582 net daily vehicle trips.[42]

Daily operational emissions of SO_x and $PM_{2.5}$ would not exceed SCAQMD thresholds; however, daily operational emissions of CO, VOCs, NO_X, and PM_{10} would exceed SCAQMD thresholds (Table 3.2.4.3-1). Thus, the operational impacts of Tier II of the proposed project would be expected to be above the level of significance for these four criteria pollutants.

Operational Local Impacts

Tier I

As noted previously, completion of Tier I of the proposed project would result in a decrease in square footage of facilities on the campus compared to existing conditions and a corresponding reduction in vehicle trips to and from the site. Therefore, localized daily operational emissions, TAC levels, and odor impacts would be expected to be below the level of significance. In addition, implementation of mitigation measures, such as carpooling and the use of public transportation, would reduce NO_x emissions from mobile sources, as well as the overall NO_x emission levels, from the proposed project. Therefore, the long-term exposure of sensitive receptors to Tier I's operational NO_x emissions would be expected to be below the level of significance.

[42] Raju Associates, Inc. July 2010. *Traffic Study for Martin Luther King, Jr. Medical Center Campus Redevelopment Project*. Pasadena, CA.

Tier II

Carbon monoxide is considered a localized problem under Section 9.4 of SCAQMD's *CEQA Air Quality Handbook*; thus, additional analysis when a proposed project is likely to expose sensitive receptors to CO hotspots is required. Localized levels of CO concentrations from vehicles termed as CO hotspots were analyzed for Tier II of the proposed project as additional number of peak hour vehicle trips that would be added to the intersections under the existing congested condition without the proposed project. Results of the CALINE4 screening method indicated that impacts of localized concentrations of CO at sensitive receptors would be below the CAAQS and NAAQS for 1-hour and 8-hour CO concentrations.[43] The CALINE4 calculations do not indicate the potential for CO hotspots. Therefore, local impacts of CO as a result of Tier II of the proposed project would be expected to be below the level of significance.

Toxic air contaminants impacts at the proposed project site would primarily result from diesel particulate emissions associated with heavy-duty equipment operations. The operation of Tier II of the proposed project would not generate a substantial number of heavy-duty equipment operations or daily truck trips. Delivery truck trips, during project operation, would be the only primary source contributing to the TAC level at the proposed project site. However, the number of heavy-duty delivery trucks accessing the proposed project site on a daily basis would be minimal due to the application of the proposed project as a medical and mixed use facility. In addition, other sources including manufacturing industries and automobile repair facilities are typical sources of acute and chronically hazardous TACs. Because the proposed project site does not contain manufacturing industries or automobile repair facilities, additional amounts of TACs would be less likely to be contributed to the proposed project site. Therefore, operation-related TAC emissions due to Tier II of the proposed project would be below the level of significance, and, consequently, would have a less than significant impact on human health.

According to SCAQMD's *CEQA Air Quality Handbook*,[44] odor nuisance is associated with land uses and industrial operations including agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Since the proposed project development does not include any land uses or industrial operations that are typically associated with odor nuisance, Tier II of the proposed project would cause less than significant odor impacts. Furthermore, although on-site trash receptacles have the potential to create odors, they would be maintained and controlled in a manner that controls adverse odors and complies with SCAQMD Rule 402. Therefore, operational odor impacts due to Tier II of the proposed project would be below the level of significance.

Localized daily operational emissions, TAC levels, and odor impacts as a result of Tier II would be expected to be below the level of significance. In addition, implementation of mitigation measures, such as carpooling and the use of public transportation, would reduce NO_x emissions from mobile sources, as well as the overall NO_x emission levels, from the proposed project. Therefore, although there may be short-term related impacts, the long-term exposure of sensitive receptors to the proposed project's operational NO_x emissions would be expected to be below the level of significance.

[43] Sapphos Environmental, Inc. July 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[44] South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

3.2.4.4 Cumulative Impacts

SCAQMD's methodological framework was used to assess the proposed project's cumulative impacts for both Tier I and Tier II. In order to assess cumulative impacts based on the AQMP's forecasts of attainment of ambient air quality standards set forth in the Federal and State Clean Air Acts, this methodological framework takes into account forecasted regional growth projections from SCAG. Cumulative development can affect implementation of the AQMP. The 2007 AQMP was prepared to accommodate growth, to reduce pollutants within the SCAQMD portion of the SCAB, and to minimize the impact on the economy. Growth considered to be consistent with the 2007 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the SCAB is within the projections for growth identified by SCAG, implementation of the 2007 AQMP would not be obstructed by such growth and cumulative impacts would be less than significant.

Tier I

Since the proposed project would not induce substantial population growth and would be consistent with the growth projections anticipated by SCAG (as further discussed in Section 3.9, *Population and Housing,* of this EIR), Tier I of the proposed project would be expected to cause a less than significant cumulative air quality impact in relation to consistency with the AQMP.

However, it was determined that there are forty-two (42) projects that could affect the cumulative impact analysis of the proposed project that are anticipated to be implemented within construction period for both tiers of the proposed project occurring within an approximate 3-mile radius of the proposed project site (Section 2.0, *Project Description,* Table 2.6-1, *List of Related Projects*). According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the basin is a non-attainment area. As discussed previously, construction and operational air quality emissions from Tier I of the proposed project as analyzed in this EIR would not have the potential to be above the level of significance. Therefore, implementation of Tier I of the proposed project would not be expected to result in cumulative impacts when considered with construction and operation of the related past, present, or reasonably foreseeable, probable future projects.

Tier II

Since the proposed project would not induce substantial population growth and would be consistent with the growth projections anticipated by SCAG (as further discussed in Section 3.9, *Population and Housing,* of this EIR), Tier II of the proposed project would be expected to cause a less than significant cumulative air quality impact in relation to consistency with the AQMP.

However, it was determined that there are forty-two (42) projects that could affect the cumulative impact analysis of the proposed project that are anticipated to be implemented construction period for both tiers of the proposed project occurring within an approximate 3-mile radius of the proposed project site (Section 2.0, *Project Description,* Table 2.6-1). According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the basin is a non-attainment area. As discussed previously, construction and operational air quality emissions from Tier II of the proposed project as analyzed in this EIR may have the potential to be above the level of significance. Therefore, implementation of Tier II of the proposed project would

be expected to result in cumulative impacts when considered with construction and operation of the related past, present, or reasonably foreseeable, probable future projects.

3.2.5 Mitigation Measures

Air quality mitigation measures are provided to reduce construction-phase criteria pollutant emissions to the maximum extent feasible and to ensure compliance with SCAQMD Rule 403 Fugitive Dust in order to reduce, prevent, or mitigate particulate matter emissions from the proposed project's construction phase. There are no feasible mitigation measures that can be implemented to reduce the mobile source-related operational impacts of Tier II of the proposed project.

Tier I

Measure Air-1

Water or a stabilizing agent shall be applied during Tier I to exposed surfaces in sufficient quantity to prevent generation of dust plumes. Soil moistening shall be required to treat exposed soil during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. Prior to advertising for construction bids for each element, the plans and specifications shall be reviewed by the lead agency to ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that soil shall be moistened not more than 15 minutes prior to the daily commencement of soil-moving activities and three times a day, or four times a day under windy conditions (when winds exceed 25 miles per hour), in order to maintain a soil moisture content of 12 percent, as determined by American Society for Testing and Materials method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency. The construction contractor shall demonstrate compliance with this measure through the submission of weekly monitoring reports to the lead agency. At a minimum, active operations shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type that is part of the active operation.

Measure Air-2

Moistening or covering of excavated soil piles shall be required during Tier I to treat grading areas during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that excavated soil piles are watered hourly for the duration of construction or covered with temporary coverings.

Measure Air-3

Discontinuing Tier I construction activities that occur on unpaved surfaces during windy conditions (when winds exceed 25 miles per hour) shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the

requirement for the construction contractor to cease construction activities that occur on unpaved surfaces during periods when winds exceed 25 miles per hour.

Measure Air-4

Track-out during Tier I shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday. Track-out is defined by the South Coast Air Quality Management District as any bulk material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that have been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure that the track-out shall not extend 25 feet or more from an active operation and that it would be removed at the conclusion of each workday.

Measure Air-5

A wheel washing system shall be installed during Tier I, and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site. Washing of wheels leaving the construction site during construction of each element shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. The lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to clean adjacent streets of tracked dirt at the end of each workday or install on-site wheel-washing facilities.

Measure Air-6

All haul trucks hauling soil, sand, and other loose materials during Tier I shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions). All transport of soils to and from the project site for each element shall be conducted in a manner that avoids fugitive dust emissions and ensures compliance with current air quality standards. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cover all loads of dirt leaving the site or to leave sufficient freeboard capacity in the truck to prevent fugitive dust emissions en route to the disposal site.

Measure Air-7

Traffic speeds on unpaved roads during Tier I shall be limited to 15 miles per hour. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure a traffic speed limited to 15 miles per hour.

Measure Air-8

Heavy-equipment Tier I operations shall be suspended during first- and second-stage smog alerts. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction

contractor to ensure heavy-equipment operations be suspended during first- and second-stage smog alerts.

Measure Air-9

All diesel engines used during Tier I for construction activities for the project that are not registered under California Air Resources Board's Statewide Portable Equipment Registration Program and have a rating of 50 horsepower or more, shall meet, at a minimum, the Tier 2 California Emission Standards for Off-road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, section 2423(b)(1) unless that such engine is not available for a particular item of equipment. In the event a Tier 2 engine is not available for any diesel engine larger than 50 horsepower, that engine shall be equipped with retrofit controls that would provide nitrogen oxide and particulate matter emissions that are equivalent to a Tier 2 engine. All equipment shall be turned off when not in use. Engine idling of all equipment used during both construction and operation/maintenance shall be minimized. All equipment engines shall be maintained in good operating condition and in proposed tune per manufacturers' specification. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure the construction equipment meet the aforementioned criteria.

Tier II

Measure Air-1

Water or a stabilizing agent shall be applied during Tier II to exposed surfaces in sufficient quantity to prevent generation of dust plumes. Soil moistening shall be required to treat exposed soil during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. Prior to advertising for construction bids for each element, the plans and specifications shall be reviewed by the lead agency to ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that soil shall be moistened not more than 15 minutes prior to the daily commencement of soil-moving activities and three times a day, or four times a day under windy conditions (when winds exceed 25 miles per hour), in order to maintain a soil moisture content of 12 percent, as determined by American Society for Testing and Materials method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency. The construction contractor shall demonstrate compliance with this measure through the submission of weekly monitoring reports to the lead agency. At a minimum, active operations shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type that is part of the active operation.

Measure Air-2

Moistening or covering of excavated soil piles shall be required during Tier II to treat grading areas during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that excavated soil piles are watered hourly for the duration of construction or covered with temporary coverings.

Measure Air-3

Discontinuing Tier II construction activities that occur on unpaved surfaces during windy conditions (when winds exceed 25 miles per hour) shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cease construction activities that occur on unpaved surfaces during periods when winds exceed 25 miles per hour.

Measure Air-4

Track-out during Tier II shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday. Track-out is defined by the South Coast Air Quality Management District as any bulk material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that have been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure that the track-out shall not extend 25 feet or more from an active operation and that it would be removed at the conclusion of each workday.

Measure Air-5

A wheel washing system shall be installed during Tier II, and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site. Washing of wheels leaving the construction site during construction of each element shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. The lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to clean adjacent streets of tracked dirt at the end of each workday or install on-site wheel-washing facilities.

Measure Air-6

All haul trucks hauling soil, sand, and other loose materials during Tier II shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions). All transport of soils to and from the project site for each element shall be conducted in a manner that avoids fugitive dust emissions and ensures compliance with current air quality standards. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cover all loads of dirt leaving the site or to leave sufficient freeboard capacity in the truck to prevent fugitive dust emissions en route to the disposal site.

Measure Air-7

Traffic speeds on unpaved roads during Tier II shall be limited to 15 miles per hour. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and

specifications for each element include the requirement for the construction contractor to ensure a traffic speed limited to 15 miles per hour.

Measure Air-8

Heavy-equipment Tier II operations shall be suspended during first- and second-stage smog alerts. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure heavy-equipment operations be suspended during first- and second-stage smog alerts.

Measure Air-9

All diesel engines used during Tier II for construction activities for the project that are not registered under California Air Resources Board's Statewide Portable Equipment Registration Program and have a rating of 50 horsepower or more, shall meet, at a minimum, the Tier 2 California Emission Standards for Off-road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, section 2423(b)(1) unless that such engine is not available for a particular item of equipment. In the event a Tier 2 engine is not available for any diesel engine larger than 50 horsepower, that engine shall be equipped with retrofit controls that would provide nitrogen oxide and particulate matter emissions that are equivalent to a Tier 2 engine. All equipment shall be turned off when not in use. Engine idling of all equipment used during both construction and operation/maintenance shall be minimized. All equipment engines shall be maintained in good operating condition and in proposed tune per manufacturers' specification. Prior to advertising for construction bids for each element of the project, the lead agency shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure the construction equipment meet the aforementioned criteria.

3.2.6 Level of Significance after Mitigation

Tier I

Implementation of air quality mitigation measures Air-1 through Air-8 would reduce fugitive dust emissions associated with construction activities, which would cause daily $PM_{2.5}$ and PM_{10} emissions to remain at below the SCAQMD thresholds of significance (Table 3.2.6-1, *Tier I: Mitigated Estimated Daily Regional Construction Emissions*).[45]

[45] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

TABLE 3.2.6-1
TIER I: MITIGATED
ESTIMATED DAILY REGIONAL CONSTRUCTION EMISSIONS

Construction Phase	Construction Emissions (Pounds/Day)					
	VOCs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
Demolition	3	21	13	0	1	1
Mass Site Grading	7	79	34	<1	5	10
Trenching	4	31	20	0	2	2
Building Construction[1]	10	81	42	<1	3	3
Paving	2	14	11	0	1	1
Architectural Coating	74	<1	0	0	<1	0
90 worker trips	<1	1	6	<1	<1	1
Maximum Regional Total	**74**	**82**	**48**	<1	**5**	**11**
SCAQMD Daily Significance Threshold (Pounds/Day)	**75**	**100**	**550**	**150**	**55**	**150**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Implementation of mitigation measure Air-9 would ensure that criteria pollutant emissions associated with the use of construction equipment would be reduced to the maximum extent feasible. As such, criteria pollutant emissions during construction would remain below the level of significance, and would therefore not be significant.

Mitigation measures Air-1 through Air-9 would also ensure that cumulative air quality impacts during construction would remain at below the level of significance and that construction-related impacts to sensitive receptors would be reduced to below the level of significance.

Tier II

Implementation of air quality mitigation measures Air-1 through Air-8 would reduce fugitive dust emissions associated with construction activities, which would cause daily $PM_{2.5}$ and PM_{10} emissions to remain at below the SCAQMD thresholds of significance (Table 3.2.6-2, *Tier II: Mitigated Estimated Daily Regional Construction Emissions*).[46]

[46] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

TABLE 3.2.6-2
TIER II: MITIGATED
ESTIMATED DAILY REGIONAL CONSTRUCTION EMISSIONS

Year	Maximum Construction Emissions (Pounds/Day)					
	VOCs	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
2010	7	79	34	<1	5	10
2011	16	156	75	<1	8	13
2012	25	217	111	<1	10	16
2013	94	207	116	<1	9	15
2014	94	185	112	<1	8	14
2015	93	166	108	<1	7	13
2016	90	148	105	<1	7	13
2017	88	131	102	<1	6	12
2018	85	118	99	<1	4	5
2019	80	70	65	<1	3	3
2020	76	31	32	<1	1	1
150 worker trips	1	1	7	<1	<1	2
Maximum Regional Total	95	218	123	<1	10	18
SCAQMD Daily Significance Threshold (Pounds/Day)	**75**	**100**	**550**	**150**	**55**	**150**
Significant?	**Yes**	**Yes**	**No**	**No**	**No**	**No**

Implementation of mitigation measure Air-9 would ensure that criteria pollutants emissions associated with the use of construction equipment would be reduced to the maximum extent feasible. However, VOCs and NO_x emissions during construction would still result in temporary significant and unavoidable impacts.

Mitigation measures Air-1 through Air-9 would also ensure that air quality impacts on sensitive receptors during construction would be reduced to the maximum extent feasible. However, implementation of Tier II of the proposed project would still have the potential to result in significant impacts to sensitive receptors related to emissions of NO_x, $PM_{2.5}$, and PM_{10}.

Mitigation measures Air-1 through Air-9 would also ensure that cumulative air quality impacts during construction would be reduced to the maximum extent feasible. However, implementation of Tier II of the proposed project would still be expected to result in cumulative construction-related impacts when considered with construction and operation of the related past, present, or reasonably foreseeable, probable future projects.

As there are no feasible mitigation measures for operation of Tier II; therefore, criteria pollutant emissions from mobile sources during operation of Tier II would remain at above the level of significance.

3.3 CULTURAL RESOURCES

As a result of the Initial Study, the County of Los Angeles determined that the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in impacts to cultural resources.[1] Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts to cultural resources and to identify alternatives.

The analysis of cultural resources consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the proposed project area, thresholds for assessing the level of significance of impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. Potential impacts to cultural resources at the proposed project site were evaluated based on queries at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, and corresponding review of the information center's U.S. Geological Survey (USGS) 7.5-minute series South Gate and Inglewood topographic quadrangle maps.[2] Additional research was conducted at the Los Angeles Public Library, Natural History Museum of Los Angeles County, and with the Native American Heritage Commission. Published and unpublished literature was reviewed, including the 2009 editions of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historic Resources Inventory (HRI), the listing of California Historic Landmarks (CHL), and the California Points of Historical Interest (CPHI), to ascertain the presence of archaeological and historic resources that could potentially be affected as a result of the proposed project. In addition, an intensive-level historical resource evaluation was conducted for the proposed project site by Sapphos Environmental, Inc. (Appendix E, *Cultural Resources Technical Report*).

3.3.1 Regulatory Framework

Federal

National Historic Preservation Act[3]

Enacted in 1966, the National Historic Preservation Act (NHPA) declared a national policy of historic preservation and instituted a multifaceted program, administered by the Secretary of the Interior, to encourage the achievement of preservation goals at the federal, state, and local levels. The NHPA authorized the expansion and maintenance of the National Register of Historic Places (NRHP), established the position of State Historic Preservation Officer (SHPO) and provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHRA, assisted Native American tribes to preserve their cultural heritage, and created the Advisory Council on Historic Preservation (ACHP).

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[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

[2] U.S. Geological Survey. 1964. 7.5-Minute Series South Gate, California, Topographic Quadrangle. Reston, VA.

U.S. Geological Survey. 1964. 7.5-Minute Series Inglewood, California, Topographic Quadrangle. Reston, VA.

[3] *United States Code*. Title 16, Section 470.

Section 106

Section 106 of the NHPA states that federal agencies with direct or indirect jurisdiction over federally funded, assisted, or licensed undertakings must take into account the effect of the undertaking on any historic property that is included in or eligible for inclusion in the NRHP and that the ACHP must be afforded an opportunity to comment—through a process outlined in the ACHP regulations, in Title 36 of the Code of Federal Regulations (CFR) Part 800—on such undertakings. The Section 106 process involves identification of significant historic resources within an "area of potential effect," determination if the undertaking will cause an adverse effect on historic resources, and resolution of those adverse effects through execution of a Memorandum of Agreement. In addition to the ACHP, interested members of the public, including individuals, organizations, and agencies (such as the California Office of Historic Preservation), are provided with opportunities to participate in the process.

The proposed project is financed in part by federally funded Build America Bonds issued under the American Reinvestment and Recovery Act of 2009. The issuance of these federal bonds has been determined by the ACHP to constitute a ministerial action on the part of the US Treasury or Internal Revenue Service.[4] Ministerial acts are not subject to Section 106 review. The County of Los Angeles General Counsel concurs with this interpretation of Build America Bonds as a ministerial action.[5] The project does not meet the definition of a federal undertaking; therefore, Section 106 of the NHPA is not applicable.

National Register of Historic Places

The NRHP was established by the NHPA of 1966 as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."[6] The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American or regional/local history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance also must possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the four established criteria:[7]

Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history;

Criterion B: It is associated with the lives of persons who are significant in our past;

Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or

[4] Advisory Council on Historic Preservation. 9 October 2009. "Build America Bonds and Section 106." http://www.achp.gov/news091009.html

[5] Hawkins, Delafield, and Wood (Mr. Arto C. Becker and Mr. Russell Miller). 7 April 2010. Memorandum: Various Questions Regarding the American Recovery and Reinvestment Act of 2009. Submitted to the County of Los Angeles (Mr. Glenn Byers, Mr. Douglas Baron, Ms. Cammy DuPont).

[6] *Code of Federal Regulations*. Title 36, Section 60.2.

[7] *Code of Federal Regulations*. Title 36, Section 60.4.

represents a significant and distinguishable entity whose components may lack individual distinction; and/or

Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily cemeteries, birthplaces, or graves of historic figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, and properties that are primarily commemorative in nature are not considered eligible for the NRHP, unless they satisfy certain conditions. In general, a resource must be 50 years old to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

No properties within the proposed project site are listed in or have been formally determined eligible for listing in the NRHP.

Secretary of the Interior's Standards for the Treatment of Historic Properties

Evolving from the *Secretary of the Interior's Standards for Historic Preservation Projects with Guidelines for Applying the Standards* that were developed in 1976, the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* was published in 1995 and codified as 36 CFR 67. Neither technical nor prescriptive, these standards are "intended to promote responsible preservation practices that help protect our Nation's irreplaceable cultural resources."[8] *Preservation* acknowledges a resource as a document of its history over time and emphasizes stabilization, maintenance, and repair of existing historic fabric. *Rehabilitation* not only incorporates the retention of features that convey historic character but also accommodates alterations and additions to facilitate continuing or new uses. *Restoration* involves the retention and replacement of features from a specific period of significance. *Reconstruction*, the least used treatment, provides a basis for recreating a missing resource. These standards have been adopted, or are used informally, by many agencies at all levels of government to review projects that affect historic resources.

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

[8] Weeks, Kay D., and Anne E. Grimmer. 1995. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstruction Historic Buildings*. Washington, DC: U.S. Department of the Interior, National Park Service.

State of California

California Environmental Quality Act[9]

Pursuant to the California Environmental Quality Act (CEQA), an historical resource is a resource listed in, or eligible for listing in, the California Register of Historical Resources (CRHR). In addition, resources included in a local register of historical resources or identified as significant in a local survey conducted in accordance with state guidelines also are considered historical resources under CEQA, unless a preponderance of evidence demonstrates otherwise. According to CEQA, the fact that a resource is not listed in or determined eligible for listing in the CRHR or is not included in a local register or survey shall not preclude a Lead Agency, as defined by CEQA, from determining that the resource may be an historical resource as defined in California Public Resources Code (PRC) Section 5024.1.[10] Pursuant to CEQA, a project with an effect that may cause a substantial adverse change in the significance of an historical resource may have a significant effect on the environment.[11]

CEQA also applies to effects on archaeological sites. Archaeological sites may be eligible for the CRHR and thus would qualify as historical resources under CEQA. If an archaeological site does not satisfy the criteria as an historical resource but does meet the definition of a "unique archaeological resource," it is also subject to CEQA. A unique archaeological resource is defined as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:[12]

(1) It contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information

(2) It has a special and particular quality such as being the oldest of its type or the best available example of its type

(3) It is directly associated with a scientifically recognized important prehistoric or historic event or person

California Register of Historical Resources

Created in 1992 and implemented in 1998, CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change."[13] Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys or

[9] *California Public Resources Code*. Division Thirteen, Statutes 21083.2, 21084.1.

[10] *California Code of Regulations*. Title 14, Chapter 3. CEQA Guidelines, Section 15064.5(a).

[11] *California Code of Regulations*. Title 14, Chapter 3. CEQA Guidelines, Section 15064.5(b).

[12] *California Public Resources Code*. Section 21083.2(g).

[13] *California Public Resources Code*. Section 5024.1(a).

designated by local landmarks programs, may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:[14]

Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Criterion 2: It is associated with the lives of persons important in our past.

Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.

Criterion 4: It has yielded, or may be likely yield, information important in history or prehistory.

Resources nominated to the CRHR must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.[15] It is possible that a resource whose integrity does not satisfy NRHP criteria still may be eligible for listing in the CRHR. Similarly, resources that have achieved significance within the past 50 years may be eligible for inclusion in the CRHR if enough time has lapsed to obtain a scholarly perspective on the events or individuals associated with the resource.[16]

No properties within the proposed project site are listed in or have been formally determined eligible for listing in the CRHR.

California Historical Landmarks[17]

California Historical Landmarks are buildings, structures, sites, or places that have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value and that have been determined to have statewide historical significance by meeting at least one of the criteria listed below. The resource also must be approved for designation by the County Board of Supervisors or be recommended by the State Historical Resources Commission, and be officially designated by the Director of California State Parks. The specific standards now in use first were applied in the designation of CHL 770. CHLs 770 and above are automatically listed in the CRHR.

To be eligible for designation as a *landmark*, a resource must meet at least one of the following criteria:

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[14] *California Public Resources Code*. Section 5024.1(c).

[15] Office of Historic Preservation. n.d. "Technical Assistance Bulletin 6: California Register and National Register, A Comparison (for purposes of determining eligibility for the California Register)." Available at: http://www.ohp.parks.ca.gov

[16] Office of Historic Preservation. n.d. "Technical Assistance Bulletin 6: California Register and National Register, A Comparison (for purposes of determining eligibility for the California Register)." Available at: http://www.ohp.parks.ca.gov

[17] Office of Historic Preservation. Accessed 17 July 2006. "California Historical Landmarks Registration Program." Available at: http://ohp.parks.ca.gov

- Be the first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California)

- Be associated with an individual or group having a profound influence on the history of California

- Be a prototype of, or an outstanding example of, a period, style, architectural movement, or construction, or be one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder

The proposed project site does not include any California Historical Landmarks.

California Points of Historical Interest[18]

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission also are listed in the CRHR. No historical resource may be designated as both a landmark and a *point*. If a point is subsequently granted status as a landmark, the point designation will be retired.

To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- Be the first, last, only, or most significant of its type within the local geographic region (city or county)

- Be associated with an individual or group having a profound influence on the history of the local area

- Be a prototype of, or an outstanding example of, a period, style, architectural movement, or construction, or be one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder

The proposed project site does not include any California Points of Historical Interest.

State Historical Building Code[19]

Created in 1975, the State Historical Building Code (SHBC) provides regulations and standards for the preservation, restoration, rehabilitation, or relocation of historic buildings, structures, and properties that have been determined by an appropriate local or state governmental jurisdiction to be significant in the history, architecture, or culture of an area. Rather than being prescriptive, the SHBC constitutes a set of performance criteria. The SHBC is designed to help facilitate restoration

[18] Office of Historic Preservation. Accessed 17 July 2006. "California Points of Historical Interest, Registrations Programs." Available at: http://ohp.parks.ca.gov

[19] California State Historical Building Safety Board, Division of the State Architect. 2 June 2006. "California's State Historical Building Code and State Historical Building Safety Board." Sacramento, CA. Available at: http://www.dsa.dgs.ca.gov/StateHistoricalBuildingSafetyBoard/default.htm

or change of occupancy in such a way as to preserve original or restored elements and features of a resource; to encourage energy conservation and a cost-effective approach to preservation; and to provide for reasonable safety from earthquake, fire, or other hazards for occupants and users of such buildings, structures, and properties." The SHBC also serves as a guide for providing reasonable availability, access, and usability by the physically disabled.

Native American Heritage Commission

Section 5097.91 of the Public Resources Code established the Native American Heritage Commission (NAHC), whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Section 5097.98 of the Public Resources Code specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a county coroner.

There are no listed Native American Sacred Sites within the proposed project site.

Government Code, Sections 6254(r) and 6254.10

These sections of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to "Native American graves, cemeteries, and sacred places maintained by the NAHC." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the NAHC, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency."

Health and Safety Code, Sections 7050 and 7052

Health and Safety Code, Section 7050.5 declares that, in the event of the discovery of human remains outside of a dedicated cemetery, all ground-disturbing activities must cease and the county coroner must be notified. Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

Penal Code, Section 622.5

Penal Code, Section 622.5 provides misdemeanor penalties for injuring or destroying objects of historic or archaeological interest located on public or private lands, but specifically excludes the landowner.

Public Resources Code, Section 5097.5

Public Resources Code, Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

Local

Southern California Association of Governments

The Southern California Association of Governments (SCAG) Growth Management Chapter (GMC) has instituted policies regarding the protection of cultural resources. SCAG GMC Policy No. 3.21 "encourages the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites."[20]

County of Los Angeles General Plan

The Conservation, Open Space, and Recreation element of the General Plan[21] establishes goals and policies for conservation of cultural resources in the unincorporated territory of County of Los Angeles. The General Plan recognizes that the County has numerous archaeological and historical sites from the Native American, Hispanic, and American periods of California's history, as well as paleontological sites and important geological formations that predate man's occupation and that such cultural resources are nonrenewable and irreplaceable. Policy 20 states the County's intention to "protect cultural heritage resources, including historical, archaeological, paleontological, and geological sites, and significant architectural structures."[22]

Los Angeles County Historical Landmarks and Records Commission

The Los Angeles County Historical Landmarks and Records Commission (Commission) considers and recommends to the Board of Supervisors local historical landmarks defined to be worthy of registration by the State of California, either as California Historical Landmarks or as Points of Historical Interest. The Commission also may comment for the Board on applications relating to the NRHP. The Commission also is charged with fostering and promoting the preservation of historical records. In its capacity as the memorial plaque review committee of the County of Los Angeles, the Commission screens applications for donations of historical memorial plaques and recommends to the Board plaques worthy of installation as County property.[23]

3.3.2 Existing Conditions

The existing conditions for paleontological, archaeological, and historical resources, and human remains are characterized at the project level of detail.

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[20] Southern California Association of Governments. 2001. *SCAG Growth Management Chapter (GMC) Policy No. 3.21*. Los Angeles, CA.

[21] County of Los Angeles, Department of Regional Planning. January 1993. *County of Los Angeles Streamlined General Plan*. Los Angeles, CA, p. CA2.

[22] County of Los Angeles, Department of Regional Planning. January 1993. *County of Los Angeles Streamlined General Plan*. Los Angeles, CA, p. OS-11.

[23] County of Los Angeles Department of Auditor-Controller (J. Tyler McCauley, Auditor-Controller). 21 October 2002. "Sunset Review for the Los Angeles County Historical Landmarks and Records Commission." Accessed 17 July 2006. Available at: http://auditor.co.la.ca.us/cms1_003345.pdf

3.3.2.1 Paleontological Resources

Record search results indicate that the proposed project site is located within an area with a moderate level of sensitivity to contain unique paleontological resources and is not in the vicinity of recognized unique geologic features. The geology of the proposed project site is composed of surficial deposits of younger Quaternary Alluvium (Holocene) as a result of deposition from the Los Angeles River, which currently flows through a concrete channel just east of the proposed project site, and Compton Creek nearby to the west.[24] These younger deposits are underlain by older Quaternary Alluvium, which has the potential to contain significant fossil vertebrates[25] and a moderate level of sensitivity to contain unique paleontological resources.

The closest known fossil localities, identified as LACM 1295, 1344, 3266, and 4206, were recovered from these older Quaternary deposits. They are situated west of the proposed project site in the Athens vicinity around the Harbor Freeway [State Route (SR) 110], from south of Imperial Highway to near El Segundo Boulevard. These localities produced specimens of fossil pond turtle (Clemmys), puffin (Mancalla), turkey (Parapova), ground sloth (Paramylodon), mammoth (Mammuthus), dire wolf (Canis dirus), rabbit (Sylvilagus), squirrel (Sciuridae), deer mouse (Microtus), pocket gopher (Thomomys), horse (Equus), deer (Cervus), pronghorn antelope (Capromeryx), and bison (Bison), at depths as shallow as 15 feet below the surface. Therefore, extant, undisturbed deposits of older Quaternary Alluvium have a moderate level of sensitivity to produce unique paleontological resources. While the proposed project site has been substantially disturbed, it is anticipated that excavation at the proposed project site has the potential to exceed 15 feet in depth, and based on previous findings, the excavation activities would have the potential to impact native soils, underlying extant rock units, and potentially the older Quaternary deposits that have a higher likelihood of containing vertebrate fossil localities.

These findings are the result of an assessment of in-house data from the Natural History Museum of Los Angeles County[26] and the USGS 7.5-minute series South Gate topographic quadrangle[27] to ascertain the potential for paleontological resources at the proposed project site. The results of the records search indicate that there are no known vertebrate fossil localities recorded within the proposed project site.

3.3.2.2 Archaeological Resources

On October 20, 2009, a records search was conducted at the SCCIC, located at California State University, Fullerton. The USGS 7.5-minute Series South Gate and Inglewood, California, topographic quadrangles[28] were reviewed for previously recorded archaeological resources within

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[24] Dibblee, T.W., Jr. 1989. USGS 7.5-Minute Series Los Angeles Topographic Quadrangle. (Map No. DF-59.) Contact: Dibblee Geologic Foundation, P.O. Box 60560, Santa Barbara, CA 93160.

[25] McLeod, Samuel A. 21 November 2009. "Vertebrate Paleontology Section, Natural History Museum of Los Angeles County, Los Angeles, California." Letter response to Chris Purtell, Sapphos Environmental, Inc., Pasadena, CA.

[26] McLeod, Samuel A. 21 November 2009. "Vertebrate Paleontology Section, Natural History Museum of Los Angeles County, Los Angeles, California." Letter response to Chris Purtell, Sapphos Environmental, Inc., Pasadena, CA.

[27] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[28] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.; U.S. Geological Survey. 1964. 7.5-Minute Series Inglewood, California, Topographic Quadrangle. Reston, VA.

the proposed project area and within a 1.0-mile radius of the Martin Luther King, Jr. Medical Center Campus. Coordination was also undertaken with the NAHC to ascertain the presence of known Native American sacred sites. According to NAHC,[29] no Native American cultural resources have been recorded in the Sacred Lands File on or within 1 mile of the proposed project site.

The results of the records search indicate that all, or portions of, 28 previous archaeological and/or historic architectural surveys have been conducted within 1 mile from the proposed project area. No archaeological surveys have been conducted on the proposed project site. Two prehistoric burials and two historic archaeological sites have been recorded within 1 mile of the proposed project site (Table 3.3.2.2-1, *Previously Recorded Prehistoric and Historic Archaeological Sites located within 1.0 Mile of Martin Luther King, Jr. Medical Center Campus*). No known prehistoric or historic archaeological sites have been recorded on the proposed project site.

TABLE 3.3.2.2-1
PREVIOUSLY RECORDED PREHISTORIC AND HISTORIC ARCHAEOLOGICAL SITES LOCATED WITHIN 1.0 MILE OF MARTIN LUTHER KING, JR. MEDICAL CENTER CAMPUS

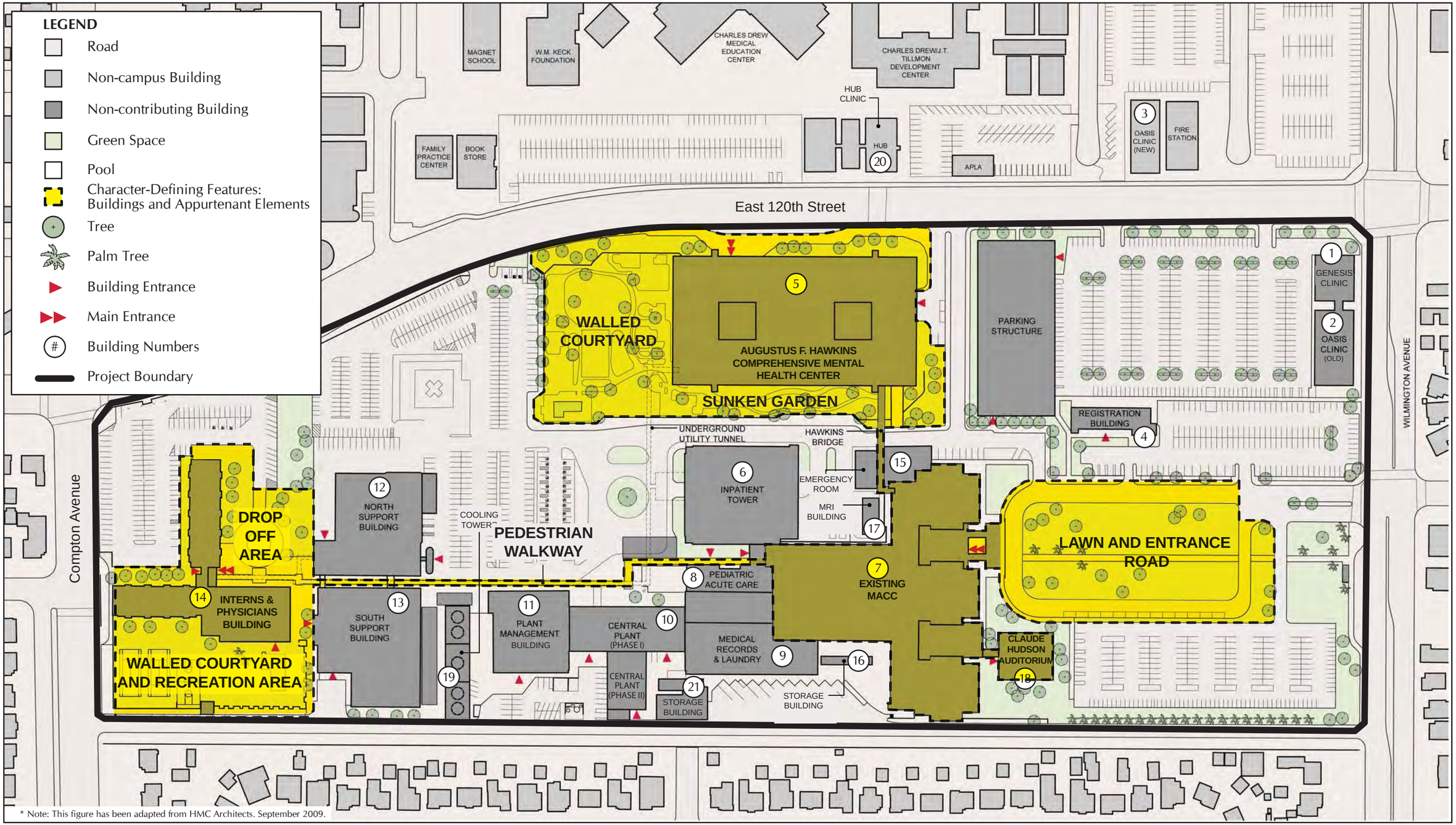
Primary No.	Description	Prehistoric	Historic
P-19-002757	Human burial, Native American	×	
P-19-002792	Human burial, Native American	×	
P-19-002848	Refuse deposit		×
P-19-100585	Foundation and collection of artifacts, possibly associated with Watts Towers		×

3.3.2.3 Historical Resources

Five historical resources, the Martin Luther King, Jr. Medical Center Campus Historic District and four contributing buildings, are located on the proposed project site.[30] This determination resulted from an intensive-level survey of the proposed project site. A total of 21 buildings that occupy the proposed project site were evaluated as potential historical resources as defined by CEQA (Table 3.3.2.3-1, *Historic Resources Survey Results*, and Figure 3.3.2.3.-1, *Martin Luther King, Jr. Medical Center Campus Historic District*). Four buildings, of the total of 21 buildings, appear to meet the criteria for listing in the NRHP and CRHR as contributors to a potential Martin Luther King, Jr. Medical Center Campus Historic District (California Historical Resources Status Code [CHR] 3D): Multi-Service Ambulatory Care Center (MACC), Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building and Dr. H. Claude Hudson Auditorium. Contributing features to the potential historic district also include seven appurtenant elements. The remaining 17 buildings and structures do not contribute to the historic district and are not considered to be historical resources.

[29] Singleton, Dave, Native American Heritage Commission, Sacramento, California. 2 November 2009. Letter to Chris Purtell, Sapphos Environmental, Inc., Pasadena, CA.

[30] Historical resources in a historic district consist of individual contributors to the district plus the district itself. Four historic district contributors have been identified in a potential historic district, for a total of five historical resources.



* Note: This figure has been adapted from HMC Architects. September 2009.

FIGURE 3.3.2.3-1
Martin Luther King, Jr. Medical Center Campus Historic District

TABLE 3.3.2.3-1
HISTORIC RESOURCES SURVEY RESULTS

	Name[31]	Date of Construction[32]	General Description	Treatment Under Project	Recommended CHR Status Code
1	Genesis Clinic	ca. 1979	One story	Tiers 1&2: To remain	6Z
2	Oasis Clinic (old)	ca. 1979	One story	Tiers 1&2: To remain	6Z
3	Oasis Clinic (new)	ca. 1995	One story	Tiers 1&2: To remain	6Z
4	Registration Building	ca. 1990	Two stories	Tiers 1&2: To remain	6Z (1)
5	Augustus F. Hawkins Comprehensive Mental Health Center	1979	Three stories plus a basement	Tiers 1&2:To remain	3D
6	Inpatient Tower	1993	Five stories plus basement	Tiers 1&2:To remain	6Z (1)
7	Multi-Service Ambulatory Care Center (MACC) (aka, King/Drew Hospital or Main Hospital Building)	1968-1972	Five stories plus a basement and penthouse	Tier I: To remain; Tier II: Reuse, Replace, or Remove	3D
8	Pediatric Acute Care	1992	One story	Tiers 1&2:To remain	6Z (1)
9	Medical Records and Laundry	1972	One story plus basement	Tiers 1&2:To remain	6Z
10	Central Plant	Phase I: late1960s; Phase II: 1975	Phase I: one story with partial mezzanine floor Phase II: one story	Tiers 1&2:To remain	6Z
11	Plant Management Building	1979	One story	Tier I: To remain, with tenant improvements	6Z
12	North Support Building	1973	Two stories	Tier I: To remain, with tenant improvements	6Z
13	South Support Building	ca. 1973	One story	Tier I: To remain, with tenant improvements	6Z
14	Interns and Physicians Building	ca. 1974	Six stories	Tier I: To remain, with tenant improvements	3D
15	Emergency Room	ca. 1985	One story	Tier I: To remain; Tier II: Reuse, Replace, or Remove	6Z
16	Storage Building (1,060 sq. ft)	ca. 1980	One story	Tier I: To remain; Tier II: Reuse, Replace, or Remove	6Z (1)

[31] Names used in this report to identify contributing resources are based on the results of the current survey and correlate with the buildings' historic use and name and may contradict previously used resource names.

[32] Construction dates used in this report to calculate the age of contributing resources are based on the results of the current survey and were calculated using building materials and historical newspaper records. The date of construction may contradict previously estimated construction years.

TABLE 3.3.2.3-1
HISTORIC RESOURCES SURVEY RESULTS, Continued

	Name[31]	Date of Construction[32]	General Description	Treatment Under Project	Recommended CHR Status Code
17	MRI Building	ca. 1980	One story	Tier I: potentially moved	6Z (1)
18	Dr. H. Claude Hudson Auditorium	ca. 1973	One story	Tiers 1&2:To remain	3D
19	Cooling Towers	ca. 1979	One story	Tier I: To remain; Tier II: Reuse, Replace, or Remove	6Z (1)
20	Hub Clinic	ca. 1980	One story	Tiers 1&2:To remain	6Z
21	Storage Building (2,533 sq. ft.)	ca. 1980	One story	Tiers 1&2:To remain	6Z

KEY:
CHR Status Code: California Historical Resources Status Code, adopted by the Office of Historic Preservation in August 2003
3D: Appears eligible for NR as a contributor to a NR eligible district through survey evaluation.
6Z: Found ineligible for NRHP, CRHR, or local designation through survey evaluation
6Z (1) Less than 50 years old and not of exceptional significance
ca. Circa
NOTE:
Unless indicated within parentheses, the names used for the buildings / structures are the same as noted in this table.

Martin Luther King, Jr. Medical Center Campus Historic District

The Martin Luther King, Jr. Medical Center Campus Historic District appears eligible for listing in the NRHP and CRHR under Criteria A/1 for its exceptional importance in relation to the history and development of the Willowbrook area and direct linkage with the McCone Commission's recommendation for a new hospital in South Los Angeles in the wake of the 1965 civil unrest centered in the Watts community. The Martin Luther King, Jr. Medical Center, the Willowbrook area's largest construction project in the years following the 1965 civil unrest, was constructed on the recommendation of the McCone Commission, which identified the lack of access to health care as one of the contributing factors that culminated in the civil unrest. With a period of significance of 1966–1979, the Martin Luther King, Jr. Medical Center originated during a turbulent era in the history of the County and the nation, and represented the hopes and aspirations of South Central Los Angeles residents and County officials in the wake of the 1965 civil disturbances. The new medical campus was intended to serve multiple roles as a health care facility and economic engine, rectifying past inequalities regarding medical services, employment, and educational facilities in South Central Los Angeles. It was designed, constructed, and staffed by a deliberately multi-ethnic team. As part of the national civil rights movement that culminated in the 1960s, the civil disturbances in and around Watts in 1965 were a pivotal moment in the history of Los Angeles County. The McCone Commission and its recommendations represented a turning point in local governance, when the County made a concerted effort to redress the inequalities that the McCone Commission identified as some of the underlying causes of the upheaval. The Martin Luther King, Jr. Medical Center was a centerpiece of the County's response and, as such, has exceptional importance as a physical manifestation of significant historical events of the 1960s in Los Angeles. Furthermore, the name it bears represents one of the most visible local efforts to commemorate a leader of the national civil rights movement, Dr. Martin Luther King, Jr.

The development of the Martin Luther King, Jr. Medical Center represented a major shift in the history and development of the Willowbrook area, which, prior to the project, was a relatively undistinguished community that still retained substantial vestiges of its original rural uses. The new hospital inspired high hopes as an economic generator and top-notch medical facility that would

provide abundant opportunities in an area of considerable need, or, as stated by Martin Luther King, Jr. Medical Center Administrator Charles E. Windsor in 1972,

> This multimillion dollar project is being set in the middle of desert of deprivation offering hope and light where there has been none, offering opportunities in fields heretofore unknown to the residents in this area, and offering medical services of a quality which would be desirable even in the most prosperous of communities.[33]

In ensuing years, the presence of a Los Angeles County hospital employed approximately 3,000 workers, provided opportunities for medical professional training and development, and spurred numerous additional development projects in Willowbrook, which included a large-scale redevelopment plan, dozens of new homes, the Kenneth Hahn Shopping Plaza and a new water system.

Related by function, period of construction, physical placement, and complementary architectural styles, the four buildings (Augustus F. Hawkins Comprehensive Mental Health Center, MACC, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium) that comprise the historic district convey intentionality as the key buildings of the Martin Luther King, Jr. Medical Center. The campus function of the property is most evident in the design of its appurtenant landscaped areas, which include the large lawn to the east of the MACC, gardens, courtyards, and circulation routes for pedestrians and vehicles. There are several pedestrian walkways that connect the four historic district contributors. The walkways enabled medical personnel and students to travel expeditiously around the campus. The MACC, for example, is connected to the Dr. H. Claude Hudson Auditorium via a low covered walkway that extends from the MACC's east façade, which provides a physical link between the medical (MACC) and assembly (Auditorium) uses. Existing gardens and courtyards, particularly those associated with the Augusts F. Hawkins Comprehensive Mental Health Center and the Interns and Physicians Building, provided recreational facilities for medical students and expressed the property's historic function as a medical center campus.

Three of the four contributing buildings (Augustus F. Hawkins Comprehensive Mental Health Center, MACC, and Interns and Physicians Building) are influenced by the Brutalism style of architecture. Brutalist buildings, considered easy to construct and maintain, were widely popular for government, civic and institutional buildings built during the 1960s and 1970s. Examples of Brutalist elements include unusual massing, typically weighted upwards, ample use of reinforced concrete with striated unfinished detailing, small recessed fixed tinted windows, general appearance of solidity, and lack of ornamentation. The fourth building (Dr. H. Claude Hudson Auditorium) marries Brutalism with "New Formalism," which represented a return to classical symmetry and post and beam construction, albeit filtered through a modern lens.

Character-defining features of the Martin Luther King, Jr. Medical Center Campus Historic District convey its historical function as a medical center campus. The character-defining features include four buildings and seven appurtenant elements:[34]

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[33] Windsor, Charles E. November 1972, "A Summary of the History and Plan for Development of the Los Angeles County Martin Luther King, Jr. General Hospital." *Journal of the National Medical Association*, Vol. 64, No. 6, p. 544-547.

[34] The character-defining features of the district are divided up between buildings and appurtenant ("landscape") elements of the district. The character-defining features of the individual buildings are listed below in the section for each building. Table 3.3.4.3-1, *Project Impact to Historical Resources* below project impacts and how the proposed project will impact the district's character-defining features (buildings & appurtenant elements).

Buildings

- MACC
- Augustus F. Hawkins Comprehensive Mental Health Center
- Interns and Physicians Building
- Dr. H. Claude Hudson Auditorium

Appurtenant Elements

- Elongated lawn located east of the MACC, which is bounded by a primary entrance road
- Sunken garden and walled courtyard located south and west of the Augustus F. Hawkins Comprehensive Mental Health Center
- Walled courtyard and recreation area located south of the Interns and Physicians Building
- Drop-off area located north of the Interns and Physicians Building and west of the North Support Building
- Pedestrian walkway extending from the MACC's east façade to the Dr. H. Claude Hudson Auditorium
- Pedestrian walkway extending from the north elevation of the MACC to the Augustus F. Hawkins Comprehensive Mental Health Center
- Pedestrian walkway extending from the east façade of the Interns and Physicians Building to the MACC

Multi-Service Ambulatory Care Center

Planning for a new hospital in South Los Angeles began in 1966, after the Los Angeles County Board of Supervisors unanimously approved the project. Construction of the 5-story (plus basement and penthouse) MACC began in 1968. The facility accepted its first patient in 1972. Character-defining features of the MACC are consistent with the Brutalism style:

- Ample use of concrete (e.g., vertically striated concrete supports and exterior framing)
- Monolithic massing
- Geometric repetition (e.g., the plan configuration consisting of three identical towers, repetitive bands of windows, and a series of balconies located on the building's façade)
- Recessed primary entrance with deeply cantilevered canopy
- Minimal ornamentation
- Overall simplicity of form
- Original landscaping (elongated central lawn crossed by a single path)

The MACC is a significant contributing building of the Martin Luther King, Jr. Medical Center Campus Historic District. The MACC was constructed as the primary component of the Martin Luther King, Jr. Medical Center Campus, which was built as a direct response to the findings of the McCone Commission that was organized to examine the causes of the 1965 civil unrest that began in nearby Watts. The McCone Commission found that South Los Angeles was severely lacking in access to medical services and recommended the immediate construction of a comprehensive hospital to remedy the stark disparities in the availability of health care services between South Los Angeles and the rest of the City of Los Angeles. Located at the far west end of a large grassy lawn,

the MACC occupies a commanding location within the site, conveying the prominence of its hospital function to visitors entering the facility from the property's main entrance at Wilmington Avenue. The building is a highly characteristic example of the Brutalism style. The Brutalism style, considered easy to construct and maintain, was a popular choice for government, civic and institutional buildings during the 1960s and 1970s and thus use of Brutalist architecture reflects the building's public function and era of construction. Landscape elements, including the central lawn crossed by a single paved sidewalk, an allée of tall palms to the south of the property, and ornamental trees and shrubs located along the building's primary façade, serve to further emphasize the building's role as the primary care facility of the Martin Luther King, Jr. Medical Center Campus. The three pedestrian walkways associated with the MACC (consisting of a low-covered walkway extending from the MACC's east façade to the Dr. H. Claude Hudson Auditorium, an elevated walkway constructed of reinforced concrete, providing pedestrian access from the MACC to the Augustus F. Hawkins Comprehensive Mental Health Center, and a walkway extending from the west elevation of the MACC, constructed of reinforced concrete columns, and traversing past several medical campus buildings before terminating at the Dr. Julius W. Hill Interns and Physicians Building), contribute to the property's architectural and functional character. The MACC exhibits few exterior alterations since its construction; its character-defining features are intact; and it retains integrity in its location, design, setting, materials, workmanship, feeling and association. As a hospital, the MACC is a key property type associated with the property's overall function as a medical care facility and postgraduate medical teaching facility.

The MACC satisfies the definition of a historical resource pursuant to CEQA [State CEQA Guidelines Section 15064.5(3)]. As a contributing building to the Martin Luther King, Jr. Medical Center Campus Historic District, the MACC meets Criterion A/1 for listing in the NRHP/CRHR for its exceptional importance in association with the history and development of the Willowbrook area and its direct linkage with the McCone Commission's recommendation for the construction of a new hospital facility in South Los Angeles in the wake of the 1965 civil unrest.

Augustus F. Hawkins Comprehensive Mental Health Center

The 3-story Augustus F. Hawkins Comprehensive Mental Health Center was built in 1979. Character-defining features of the Mental Health Center are consistent with the Brutalism style:

- Ample use of concrete with vertically striated, unfinished detailing
- Monumental horizontal massing with overhanging upper floor
- Small, recessed, fixed, tinted windows
- Recessed primary entrance
- Elevated pedestrian walkway extending from south elevation to the MACC
- Original landscaping (walled courtyard with pathways, sunken garden along south elevation, low planter wall along north facade)

The Mental Health Center is a significant contributing building of the Martin Luther King, Jr. Medical Center Campus Historic District. The Mental Health Center was constructed as a component of the Martin Luther King, Jr. Medical Center Campus, which was built as a direct response to the findings of the McCone Commission that was organized to examine the causes of the 1965 civil unrest that began in nearby Watts. The McCone Commission found that South Los Angeles was severely lacking in access to medical services and recommended the immediate construction of a comprehensive hospital to remedy the stark disparities in the availability of health care services between South Los Angeles and the rest of the City of Los Angeles. Located south of 120th Street, the Mental Health Center's monolithic north façade is a prominent feature of the

medical center campus. The building is a highly characteristic example of the Brutalism style. Brutalism style buildings, considered easy to construct and maintain, were widely popular for government, civic and institutional buildings built during the 1960s and 1970s, and thus use of Brutalist architecture reflects the building's public function. The building's unusual massing, weighted upwards, incorporates elements of the Brutalism style in its ample use of reinforced concrete with striated unfinished detailing, small recessed fixed tinted windows, general appearance of solidity, and lack of ornamentation. Landscape elements include a low planter wall that extends along the building's north facade and continues beyond the building to the west, consisting of a thickly planted assortment of compact trees, ornamental shrubs, and landscape plantings, which contribute to the architectural and functional character of the property. An entrance located on the building's south elevation is accessed via a pedestrian bridge that passes over a sunken garden containing numerous examples of evergreens and ornamental vegetation. To the west, the sunken garden transitions into a landscaped recreational area with a swimming pool, handball courts, and a small playground. The Mental Health Center exhibits few exterior and interior alterations since its construction and retains integrity in its location, design, setting, materials, workmanship, feeling and association. The Mental Health Center is associated with the function of the Martin Luther King, Jr. Medical Center Campus as a medical care and postgraduate medical teaching facility.

The Augustus F. Hawkins Comprehensive Mental Health Center satisfies the definition of a historical resource pursuant to CEQA [State CEQA Guidelines Section 15064.5(3)]. As a contributing building to the Martin Luther King, Jr. Medical Center Campus Historic District, the Mental Health Center meets Criterion A/1 for listing in the NRHP/CRHR for its exceptional significance in association with the history and development of the Willowbrook area and its direct linkage with the McCone Commission's recommendation for the construction of a new hospital facility in South Los Angeles in the wake of the 1965 civil unrest. In addition, the Mental Health Center may become eligible for listing in the NHRP/CRHR under Criterion C/3 when it reaches 50 years of age as a good example of a Brutalism style building.

Interns and Physicians Building

The 6-story Interns and Physicians Building was constructed circa 1975. Character-defining features of the Interns and Physicians Building are consistent with the Brutalism style:

- Ample use of concrete with vertically striated, unfinished detailing
- Small, recessed, fixed, tinted windows
- Flat roof
- Geometric repetition in fenestration
- Monumental window above primary entrance
- Concrete colonnade extending from east facade
- Original landscaping (walled courtyard and drop-off area)

The Interns and Physicians Building is a significant contributing building of the Martin Luther King, Jr. Medical Center Campus Historic District. The Interns and Physicians Building was constructed as a component of the Martin Luther King, Jr. Medical Center Campus, which was built as a direct response to the findings of the McCone Commission that was organized to examine the causes of the 1965 civil unrest that began in nearby Watts. The McCone Commission found that South Los Angeles was severely lacking in access to medical services and recommended the immediate construction of a comprehensive hospital to remedy the stark disparities in the availability of healthcare services between South Los Angeles and the rest of the City of Los Angeles. Dedicated

in 1974, the building was named for Dr. Julius Wanser Hill, the first African-American physician to complete his internship and residency at the Los Angeles County/University of Southern California Medical Center, Los Angeles. In 1961, Dr. Hill was appointed to the Los Angeles County Health Commission, where he served until his death in 1983.[35] Located at the southwest portion of the medical center campus near the intersection of 120th Street and Compton Avenue, the Physicians Building consists of two towers, perpendicular in plan, which point to the north and west. Constructed to house the interns and physicians involved with the Physician Assistant Program of the Charles R. Drew Postgraduate Medical School, the building incorporates elements of the Brutalism style in its ample use of reinforced concrete with striated unfinished detailing, small recessed fixed tinted windows, the geometric repetition in its fenestration, and square monumental window located above the building's primary entrance. Landscape elements include a concrete block retaining wall that bounds a courtyard, which contains a swimming pool, game courts for tennis and basketball, and a grass lawn. A long concrete colonnade extends from the building's east facade, traverses numerous buildings, and terminates at the MACC. The Interns and Physicians Building exhibits few exterior and interior alterations since its construction and retains integrity in its location, design, setting, materials, workmanship, feeling and association. The Interns and Physicians Building is a key property type associated with the function of the Martin Luther King, Jr. Medical Center Campus as a medical care and postgraduate medical teaching facility.

The Interns and Physicians Building satisfies the definition of a historical resource pursuant to CEQA [State CEQA Guidelines Section 15064.5(3)]. As a contributing building to the Martin Luther King, Jr. Medical Center Campus Historic District, the Interns and Physicians Building meets Criterion A/1 for listing in the NRHP/CRHR for its exceptional significance in association with the history and development of the Willowbrook area and its direct linkage with the McCone Commission's recommendation for the construction of a new hospital facility in South Los Angeles in the wake of the 1965 civil unrest.

Dr. H. Claude Hudson Auditorium

The single-story, Dr. H. Claude Hudson Auditorium, circa 1973, is located directly along the east façade of the MACC building. It departed somewhat from the emphatically Brutalist architecture of the other three district contributors by merging the Brutalism inspired use of concrete and solid, enclosed volumes with elements associated with the "New Formalism" style of the 1960s and 1970s. Character-defining features of the Auditorium representative of New Formalism include:

- Single, freestanding block with square plan and low massing
- Heavy, flat overhanging roof, with cantilevered eaves, extended beams, and coffer-like treatment of soffits
- Raised piers suggestive of columns
- Symmetrical facade
- Smooth concrete walls and brick panel detailing

The Auditorium is a significant contributing building of the Martin Luther King, Jr. Medical Center Campus Historic District. The Auditorium was constructed as a component of the Martin Luther King, Jr. Medical Center, which was built as a direct response to the findings of the McCone Commission that was organized to examine the causes of the 1965 civil unrest that began in nearby Watts. The McCone Commission found that South Los Angeles was severely lacking in

[35] Jack L. Moore, MD. 1984 "In Memoriam. Julius Wanser Hill." *Journal of the National Medical Association*. Vol. 76, No. 4.

access to medical services and recommended the immediate construction of a comprehensive hospital to remedy the stark disparities in the availability of healthcare services between South Los Angeles and the rest of the City of Los Angeles. Located directly adjacent to a secondary entrance on the MACC's east façade, the Auditorium's west-facing entrance is oriented towards the MACC and connected to the MACC by a covered walkway, which reinforces the spatial relationship between the Auditorium and the MACC. The east end of the building is located on the edge of a small hill, where an angular concrete stairway with a metal railing descends into a parking lot located at the foot of the hill. The Auditorium's New Formalism style elements (square plan, low massing, brick panel detailing, flat roof with cantilevered eaves, oversized beams and soffit detailing) complement the Brutalism-inspired design of the MACC. Landscape elements associated with the Auditorium include the covered walkway, landscape plantings, original outdoor lighting, and concrete stairway at the east end of the building. The Auditorium exhibits few exterior and interior alterations since its construction and retains integrity in its location, design, setting, materials, workmanship, feeling and association. The Auditorium is a key property type associated with the postgraduate medical teaching function of the Martin Luther King, Jr. Medical Center Campus.

The Dr. H. Claude Hudson Auditorium satisfies the definition of a historical resource pursuant to CEQA [State CEQA Guidelines Section 15064.5(3)]. As a contributing building to the Martin Luther King, Jr. Medical Center Campus Historic District, the Auditorium meets Criterion A/1 for listing in the NRHP/CRHR for its exceptional significance in association with the history and development of the Willowbrook area and its direct linkage with the McCone Commission's recommendation for the construction of a new hospital facility in South Los Angeles in the wake of the 1965 civil unrest.

3.3.2.4 Human Remains

Reviews of historic maps[36,37] along with the results of the records search with the NAHC,[38] indicate that there are no known Native American or historic period cemeteries, nor known informal Native American burials, within the proposed project site. However, monitoring for the construction of the Alameda Corridor Project within the cultural resources study area did result in the discovery of two human burial sites, both of which are located approximately 0.85 mile east of the proposed project site.

3.3.3 Significance Thresholds

With respect to paleontological resources, CEQA does not specifically establish thresholds for significant impacts; however, Appendix G of the CEQA Guidelines indicates that a project may have a significant effect on the environment if it would directly or indirectly destroy a unique paleontological resource or a unique geological feature.

Archaeological resources under CEQA may meet the definition of either a historical resource or unique archaeological resource. The significance of a historical resource would be significantly impaired when a project demolishes or materially alters in an adverse manner those physical

[36] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[37] U.S. Geological Survey. 1964. 7.5-Minute Series Inglewood, California, Topographic Quadrangle. Reston, VA.

[38] Singleton, Dave, Native American Heritage Commission, Sacramento, California. 02 November 2009. Letter to Chris Purtell, Sapphos Environmental, Inc., Pasadena, CA.

characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historical Resources, a local register of historic resources pursuant to Section 5020.1(k) of the Public Resources Code, or a historic resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code. With regard to unique archaeological resources, CEQA states that when a project will cause damage to a unique archaeological resource, reasonable efforts must be made to preserve the resource in place or left in an undisturbed state. Mitigation measures and alternatives are required to be considered when a historical resource or unique archaeological resource would potentially be damaged or destroyed by a project.

Also, under CEQA, a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. Substantial adverse change in the significance of an historical resource is defined as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource would be significantly impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR, a local register of historic resources pursuant to Section 5020.1(k) of the Public Resources Code, or historic resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code.

While a significance threshold for impacts to human remains is not explicitly stated in CEQA, Appendix G of the State CEQA Guidelines indicates that any disturbance of human remains could potentially be considered an impact to cultural resources, particularly with respect to Native American graves and burials.

3.3.4 Impact Analysis

3.3.4.1 Paleontological Resources

Tier I

Tier I of the proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource. The geology of the proposed project site is composed of surficial deposits of younger Quaternary Alluvium underlain by older Quaternary Alluvium. The older Quaternary Alluvium deposits have moderate sensitivity for paleontological resources and, therefore, have the potential to reveal important vertebrate fossils that can contribute to the life history of the area. Excavations may be up to 45 feet and may encounter previously undisturbed native soils and thus would have the potential to encounter paleontological resources in these older deposits. As a result, the proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource, therefore requiring the consideration of mitigation measures (Cultural-1) to reduce impacts to below the level of significance.

There are no unique geological features currently identified within the proposed project boundary; therefore, there would be no expected impacts to cultural resources related to the destruction of a unique geologic feature.

Tier II

Tier II of the proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource. The geology of the proposed project site is composed of surficial deposits of younger Quaternary Alluvium underlain by older Quaternary Alluvium. The older Quaternary Alluvium deposits have moderate sensitivity for paleontological resources and, therefore, have the potential to reveal important vertebrate fossils that can contribute to the life history of the area. Excavations are expected to be up to 45 feet and may encounter previously undisturbed native soils and thus would have the potential to encounter paleontological resources in these older deposits. As a result, the proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource, therefore requiring the consideration of mitigation measures (Cultural-1) to reduce impacts to below the level of significance.

There are no unique geological features currently identified within the proposed project boundary; therefore, there would be no expected impacts to cultural resources related to the destruction of a unique geologic feature.

3.3.4.2 Archaeological Resources

Tier I

Tier I of the proposed project would not result in significant impacts to cultural resources related to a substantial adverse change in the significance of prehistoric or historic archeological resources. There are no known prehistoric or historic archaeological resources within the proposed project area. Although it is not certain whether the proposed project site has the potential to yield archaeological resources, it is unlikely due to the area's historical development. The existing campus ground has been substantially disturbed for the construction of the Martin Luther King, Jr. Medical Center Campus. Construction of the Martin Luther King, Jr. Medical Center Campus involved excavation of native soils and the underlying geologic units to an estimated depth that exceeded 15 feet below the ground surface. Due to the level of disturbance that has occurred within the proposed project area in conjunction with construction of the Martin Luther King, Jr. Medical Center Campus in 1972 and subsequent years, extant archaeological resources would not likely be present.

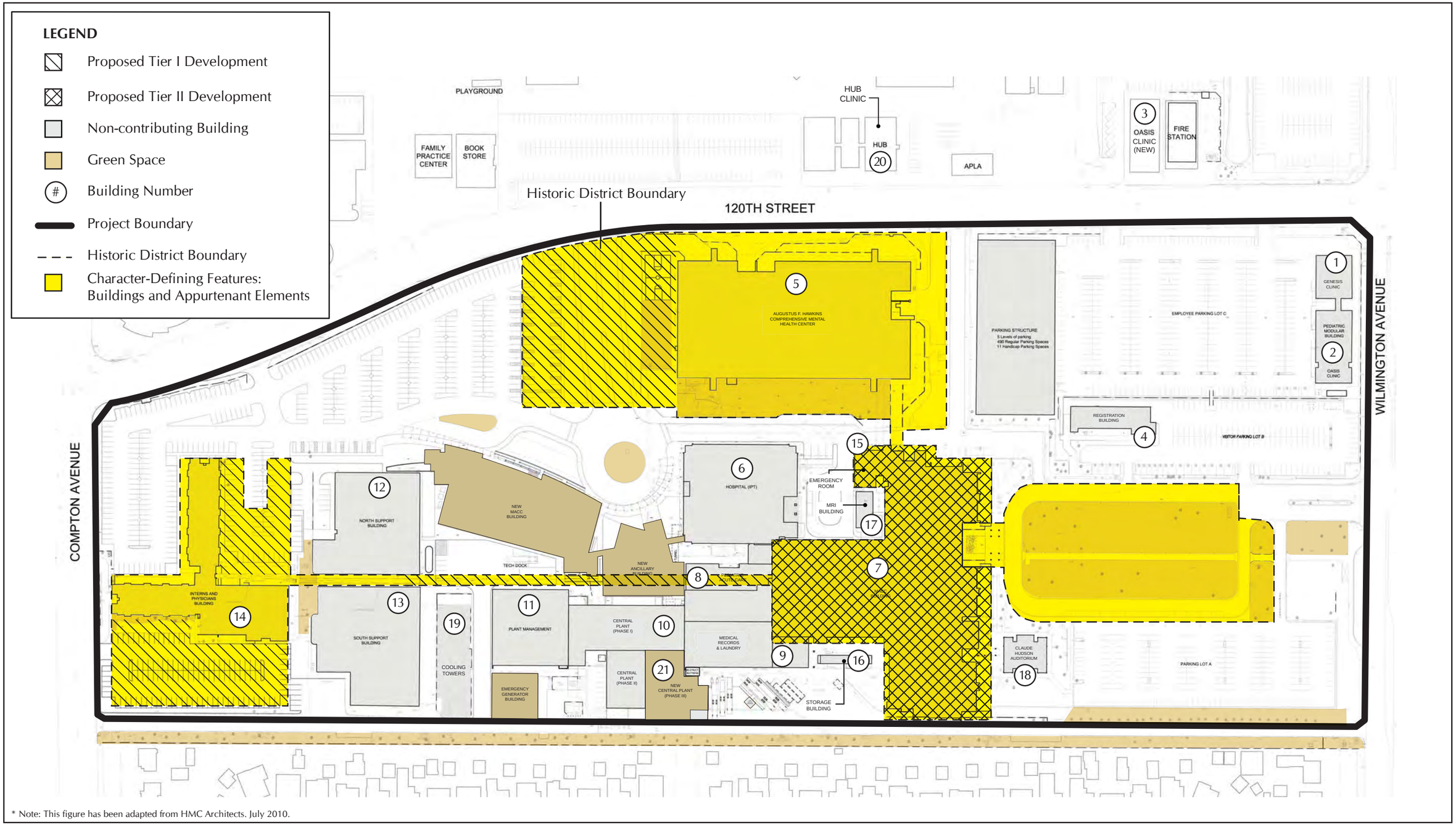
Tier II

Tier II of the proposed project would not result in significant impacts to cultural resources related to a substantial adverse change in the significance of prehistoric or historic archeological resources. There are no known prehistoric or historic archaeological resources within the proposed project area. Although it is not certain whether the proposed project site has the potential to yield archaeological resources, it is unlikely due to the historical development of the area. The existing campus ground has been substantially disturbed for the construction of the Martin Luther King, Jr. Medical Center Campus. Construction of the Martin Luther King, Jr. Medical Center Campus involved excavation of native soils and the underlying geologic units to an estimated depth that exceeded 15 feet below the ground surface. Due to the level of disturbance that has occurred within the proposed project area in conjunction with construction of the Martin Luther King, Jr. Medical Center Campus in 1972 and subsequent years, extant archaeological resources would not likely be present.

3.3.4.3 Historical Resources

The proposed project entails two tiers: Tier I and Tier II. Both tiers involve modifications that will impact character-defining features of the Martin Luther King, Jr. Medical Center Campus Historic District and its four contributing buildings (Table 3.3.4.3-1, *Project Impacts to Historical Resources*; and Figure 3.3.4.3-1, *Project Impacts to the Martin Luther King, Jr. Medical Center Campus Historic District)*. Construction of the Tier I improvements would affect character-defining features of three historical resources: appurtenant elements of the Martin Luther King, Jr. Medical Center Campus Historic District, specifically those associated with the Augustus F. Hawkins Comprehensive Mental Health Center and the Interns and Physicians Building. However, the Tier I project would not result in substantial adverse changes in the significance of historical resources such that the historic district or its contributors would no longer be eligible for inclusion in the CRHR.

Construction of the Tier II improvements would be expected to affect two historical resources, appurtenant elements of the Martin Luther King, Jr. Medical Center Campus Historic District and the MACC building. If Tier II improvements include the demolition and replacement of the MACC, a significant adverse change in the significance of the Martin Luther King, Jr. Medical Center Campus Historic District and the MACC would occur and neither resource would continue to be eligible for inclusion in the CRHR. If Tier II improvements include rehabilitation and reuse of the MACC (in a manner that would not significantly alter character-defining features), impacts to cultural resources would be reduced to below the level of significance with the implementation of mitigation measures. Due to the conceptual and evolving nature of the proposed project regarding the reuse or replacement of the MACC building, modification assumptions for this analysis assume that the master planning and comprehensive redevelopment of the campus under Tier II has the potential to result in identified project impacts as well as additional alterations to the character-defining features (buildings and appurtenant elements) of the Martin Luther King, Jr. Medical Center Campus Historic District.



* Note: This figure has been adapted from HMC Architects. July 2010.

FIGURE 3.3.4.3-1
Project Impacts to Martin Luther King, Jr. Medical Center Campus Historic District

TABLE 3.3.4.3-1
PROJECT IMPACTS TO HISTORICAL RESOURCES

Historical Resource	Impacted by Tier I	Impacted by Tier 2
Martin Luther King, Jr. Medical Center Campus Historic District	• Removal of portion of covered corridor/colonnade extending from the east facade of the Interns and Physicians Building to the MACC • Removal of landscaped open spaces, pedestrian walkways, walled courtyards	• Reuse/redevelopment of MACC • Mixed use site development • Master Plan is assumed (for the purposes of this analysis) to result in modifications, alterations, and other impacts to character-defining features
Multi-Service Ambulatory Care Center (MACC)	• N/A	• Reuse/removal/replacement/redevelopment of MACC • Removal of pedestrian walkway extending from the north elevation of the MACC to the Augustus F. Hawkins Comprehensive Mental Health Center • Removal of pedestrian walkway extending from the MACC's east façade to the Dr. H. Claude Hudson Auditorium
Augustus F. Hawkins Comprehensive Mental Health Center	• Reduction of courtyard size and partial replacement of walled courtyard, located south and west of the Augustus F. Hawkins Comprehensive Mental Health Center, with entry drive and parking	• Removal of pedestrian walkway extending from the north elevation of the MACC to the Augustus F. Hawkins Comprehensive Mental Health Center • Master Plan is assumed (for the purposes of this analysis) to result in modifications, alterations, and other impacts to character-defining features
Interns and Physicians Building	• Replacement of landscaped drop-off area, located north of the Interns and Physicians Building and west of the North Support Building, with parking • Replacement of walled courtyard, located south of the building, with parking	• Master Plan is assumed (for the purposes of this analysis) to result in modifications, alterations, and other impacts to character-defining features
Dr. H. Claude Hudson Auditorium	• N/A	• Removal of pedestrian walkway extending from the MACC's east façade to the Dr. H. Claude Hudson Auditorium • Master Plan is assumed (for the purposes of this analysis) to result in modifications, alterations, and other impacts to character-defining features

Tier I

Tier I involves construction of two new buildings, the new MACC and the Ancillary Building, vacation of the existing MACC building, tenant improvements in existing buildings, and site improvements. These modifications would affect the historic district and its contributors but would leave the majority of the character-defining features intact:

- **Martin Luther King, Jr. Medical Center Campus Historic District**. The historic district would be affected by the demolition of a portion of the covered walkway that extends west from the MACC, replacement of walled courtyards and gardens at the Augustus F. Hawkins Comprehensive Mental Health Center and the Interns and Physicians Building, construction of two new buildings, and vacation of the MACC. However, the character-defining features of the four contributing buildings would be left intact, and the majority of the covered walkways would remain in situ. Original landscaping would be retained at the historic campus entrance east of the MACC along Willowbrook Avenue and south of the Augustus F. Hawkins Comprehensive Mental Health Center. The new construction would occur in the interior of the campus, which already hosts several non-contributing buildings and structures. Although these changes are not negligible, they do not compromise the physical features of the historic district to the extent that the district would lose its eligibility for inclusion in the CRHR.

- **Multi-Service Ambulatory Care Center (MACC).** The MACC will remain in situ but would be vacated. No changes to the exterior of this building are proposed; therefore, other than the colonnaded walkway extending west from the building, the character-defining features itemized in Appendix E, Section 5.3.2.2.2, *Martin Luther King, Jr. Medical Center Campus Historic District*, would remain intact. The building will retain sufficient integrity to convey its significance as a contributor the historic district.

- **Augustus F. Hawkins Comprehensive Mental Health Center.** No changes to the exterior of this building are proposed; therefore the majority of the character-defining features itemized in Appendix E, Section 5.3.2.2.2, *Martin Luther King, Jr. Medical Center Campus Historic District*, would remain intact. Replacement of the adjacent walled courtyard would negatively affect the integrity of the setting of the building. However, the building would retain sufficient integrity to convey its significance as a contributor to the historic district.

- **Interns and Physicians Building.** Tenant improvements would be performed in the Interns and Physicians Building. No changes to the exterior of this building are proposed; therefore the majority of the character-defining features itemized in Appendix E, Section 5.3.2.2.2, *Martin Luther King, Jr. Medical Center Campus Historic District*, would remain intact. Replacement of the adjacent walled courtyard would negatively affect the integrity of the setting of the building. However, the building would retain sufficient integrity to convey its significance as a contributor to the historic district.

- **Dr. H. Claude Hudson Auditorium**. No changes to the exterior of this building are proposed; therefore the character-defining features itemized in Appendix E, Section 5.3.2.2.2, *Martin Luther King, Jr. Medical Center Campus Historic District*, would

remain intact. The building would retain its integrity and will continue to convey its significance as a contributor to the historic district.

Tier II

Tier II entails the development of a campus-wide master plan, the components of which are conceptual at this time. Tier II would have the potential to build out approximately 1,814,696 square feet of development on the proposed project site with mixed uses including medical office, commercial, retail, office space, recreation, and other development in support of the medical center. In addition, up to 100 residential units, to be developed at a multi-family density consistent with surrounding residential area multi-family development densities, are proposed in Tier II. Tier II components would also entail the reuse or replacement of the existing MACC building. Tier II may result in substantial adverse impacts to at least two historical resources, the Martin Luther King, Jr. Medical Center Campus Historic District and the MACC:

- **Martin Luther King, Jr. Medical Center Campus Historic District**. Redevelopment of the Martin Luther King, Jr. Medical Center Campus has the potential to result in demolition or alteration of the four contributing buildings and the remaining appurtenant features that contribute to the historic district to the extent that the significance of the district would be materially impaired. No plans for the Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. Claude H. Hudson Auditorium are known at this time. The MACC may be reused or demolished and replaced with other development. In association with the demolition of the MACC, the covered walkways connecting it to the Augustus F. Hawkins Comprehensive Mental Health Center and the Dr. H. Claude Hudson Auditorium would also be demolished. The MACC is the focal point of the historic district. It is the largest building on the campus and the one most closely associated with the historic function of the campus. Demolition of the MACC would result in a loss of integrity of the historic district and it would no longer be eligible for inclusion in the CRHR.

- **Multi-Service Ambulatory Care Center (MACC).** The MACC may be reused, removed, or replaced (demolished) as a result of Tier II. If the MACC is retained and reused, impacts to this historical resource would be less than significant if any modifications to character-defining features conformed to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and associated guidelines. Demolition or alterations not in conformance with the Standards would result in substantial adverse impacts to this historical resource. If the MACC building is not removed, this impact would be anticipated to be less than significant with respect to this building.

- **Augustus F. Hawkins Comprehensive Mental Health Center.** No plans for this historical resource have been formulated under Tier II; however, the master plan and comprehensive redevelopment of the campus have the potential to result in alterations to the existing building. In addition, if the MACC is demolished, the covered walkway that links it to this building would also be demolished. Impacts to this historical resource would be less than significant if any modifications to character-defining features conformed to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and associated guidelines. Alterations not in

conformance with the Standards would result in substantial adverse impacts to this historical resource.

- **Interns and Physicians Building.** No plans for this historical resource have been formulated under Tier II; however, the master plan and comprehensive redevelopment of the campus have the potential to result in alterations to the existing building. Impacts to this historical resource would be less than significant if any modifications to character-defining features conformed to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and associated guidelines. Alterations not in conformance with the Standards would result in substantial adverse impacts to this historical resource.

- **Dr. H. Claude Hudson Auditorium**. No plans for this historical resource have been formulated under Tier II; however, the master plan and comprehensive redevelopment of the campus have the potential to result in alterations to the existing building. In addition, if the MACC is demolished, the covered walkway that links it to this building would also be demolished. Impacts to this historical resource would be less than significant if any modifications to character-defining features conformed to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and associated guidelines. Alterations not in conformance with the Standards would result in substantial adverse impacts to this historical resource.

In the event that the five historical resources are not removed or otherwise impacted through significant modifications or alterations to the character-defining features of these resources, this impact would be less than significant and would not require mitigation.

3.3.4.4 Human Remains

Tier I

Tier I of the proposed project would not be expected to directly or indirectly disturb human remains, including those interred outside of formal cemeteries. There are no formal cemeteries on the property, and the ground has been substantially disturbed for the construction of the Martin Luther King, Jr. Medical Center Campus. The results of the archaeological record search, review of historic maps,[39,40] and the NAHC Sacred Lands File search,[41] indicate that no historic period or Native American burial grounds are located within the proposed project site. However, monitoring for the construction of the Alameda Corridor Project within the cultural resources study area did result in the discovery of two human burials located approximately 0.85 miles east of the proposed project site. It is anticipated that ground-disturbing activities, which would include, but are not limited to, drilling, excavation, trenching, and grading, for the proposed project may be up to 45 feet. Although there are no known burial sites within the proposed project site, the potential disruption of human remains from of an unanticipated discovery during ground-disturbing activities constitutes a significant impact requiring the consideration of mitigation measures.

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[39] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[40] U.S. Geological Survey. 1964. 7.5-Minute Series Inglewood, California, Topographic Quadrangle. Reston, VA.

[41] Singleton, Dave, Native American Heritage Commission, Sacramento, California. 02 November 2009. Letter to Chris Purtell, Sapphos Environmental, Inc., Pasadena, CA.

Tier II

Tier II of the proposed project would not be expected to directly or indirectly disturb human remains, including those interred outside of formal cemeteries. There are no formal cemeteries on the property, and the ground has been substantially disturbed for the construction of the Martin Luther King, Jr. Medical Center Campus. The results of the archaeological record search, review of historic maps,[42,43] and the NAHC Sacred Lands File search,[44] indicate that no historic period or Native American burial grounds are located within the proposed project site. However, monitoring for the construction of the Alameda Corridor Project within the cultural resources study area did result in the discovery of two human burials, both of which are located approximately 0.85 mile east of the proposed project site. It is anticipated that ground-disturbing activities, which would include, but are not limited to, drilling, excavation, trenching, and grading, for the proposed project may be up to 45 feet. Although there are no known burial sites within the proposed project site, the potential disruption of human remains from of an unanticipated discovery during ground-disturbing activities constitutes a significant impact requiring the consideration of mitigation measures.

3.3.4.5 Cumulative Impacts

Under Tier I, the incremental impact of the proposed project would be less than significant for cultural resources. The impact of Tier II of the proposed project when evaluated in relation to the closely related past, present, or reasonably foreseeable probable future projects would be expected to contribute to cumulative impacts to cultural resources related to the loss of historical resources. There are few extant properties that are associated with the development of Willowbrook and the McCone Commission's recommendation for a new hospital in south Los Angeles in the wake of the 1965 civil unrest and the proposed project would therefore result in the loss of limited resources with similar historic contexts. However, none of the forty-two (42) related projects that are anticipated to be implemented within the construction period for both tiers of the proposed project within an approximate 3-mile radius of the proposed project site are associated with the historic context of the Martin Luther King, Jr. Medical Center Campus Historic District.

Tier I

Under Tier I, the incremental impact of the proposed project on paleontological resources, archaeological resources, historical resources, and human remains would be less than significant. There are no expected impacts to paleontological resources, as mitigation measures are required to reduce impacts to the older Quaternary Alluvium deposits present at the Tier I project site to below the level of significance. There are no unique geological features on the proposed site for Tier I and therefore, there would be no expected impacts to cultural resources related to the destruction of a unique geologic feature. Although it is not certain whether the proposed project site has the potential to yield archaeological resources, it is unlikely due to the historical development of the area and therefore there are no expected impacts to archaeological resources. The construction of the two new buildings, the new MACC and the Ancillary Building, in Tier I would affect several

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[42] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[43] U.S. Geological Survey. 1964. 7.5-Minute Series Inglewood, California, Topographic Quadrangle. Reston, VA.

[44] Singleton, Dave, Native American Heritage Commission, Sacramento, California. 02 November 2009. Letter to Chris Purtell, Sapphos Environmental, Inc., Pasadena, CA.

appurtenant elements and the spatial relationship of the historic district and its contributors but would otherwise leave the majority of the character-defining features of the historic district intact to the extent that the district would retain sufficient integrity for inclusion in the CRHR. There are no known burial sites within the proposed project site for Tier I; however, the potential disruption of human remains from an unanticipated discovery during ground-disturbing activities constitutes a significant impact requiring the consideration of mitigation measures to reduce any impacts to below the level of significance.

Tier II

Tier II entails the development of a campus-wide master plan, the components of which are conceptual at this time; however, the incremental impacts of Tier II may be significant for historical resources. Tier II may result in substantial adverse impacts to at least two historical resources, the Martin Luther King, Jr. Medical Center Campus Historic District and the MACC building. Specifically, Tier II would entail the reuse or replacement of the existing MACC building. The incorporation of mitigation measures would reduce the cumulative significant impact regarding the demolition of a historical resource; however, the demolition would still remain a significant adverse impact as it would result in the loss of limited resources with similar historic contexts regarding the history of Willowbrook and the direct linkage with the McCone Commission's recommendation for a new hospital in south Los Angeles in the wake of the 1965 civil unrest. Implementation of Tier II of the proposed project would cause an incremental impact to a finite and nonrenewable resource base with a connection to the history of Willowbrook and the McCone Commission's recommendation when considered with the related past, present, or reasonably foreseeable, probable future project.

Under Tier II, there are no expected incremental impacts to paleontological resources, archaeological resources, and human remains. Regarding paleontological resources, mitigation measures are required to reduce impacts to the older Quaternary Alluvium deposits present at the Tier II project site to below the level of significance. There are no unique geological features on the proposed site for Tier II and therefore, there would be no expected impacts to cultural resources related to the destruction of a unique geologic feature. Due to the level of disturbance that has occurred within the proposed project area of Tier II in conjunction with construction of the Martin Luther King, Jr. Medical Center Campus in 1972 and subsequent years, extant archaeological resources would not likely be present and therefore there are no expected impacts to archaeological resources under Tier II. There are no known burial sites within the proposed project site for Tier II; however, the potential disruption of human remains from an unanticipated discovery during ground-disturbing activities constitutes a significant impact requiring the consideration of mitigation measures to reduce any impacts to below the level of significance.

3.3.5 Mitigation Measures

Tier I

Paleontological Resources

<u>Measure Cultural-1</u>

The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation of unanticipated paleontological resources

discovered during ground-disturbing activities in previously undisturbed native soils located 15 or more feet below the ground surface that would have the potential to contact extant older Quaternary Alluvium. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, the County of Los Angeles shall require and be responsible for salvage and recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology:

- Paleontological Resources Sensitivity Training is required for all project personnel prior to the start of ground-disturbing activities. This brief (approximately 15 minute) field training reviews what fossils are, what fossils might potentially be found, and the appropriate procedures to follow if fossils are found.

- Prior to any ground-disturbing activities, the County of Los Angeles shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain unique paleontological resources.

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data.

- All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the County of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the County of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources.

Human Remains

Measure Cultural-2

Although the discovery of human remains is not anticipated during ground-disturbing activities for the proposed project, a process has been delineated for addressing the unanticipated discovery of human remains:

- Unanticipated Discovery of Human Remains (Public Resources Code 5097). The Los Angeles County Coroner shall be notified within 24 hours of the discovery of human remains. Upon discovery of human remains, there shall be no further excavation or disturbance of the site or any of that area reasonably suspected to overlie adjacent human remains until the following conditions are met:

  - The Los Angeles County Coroner has determined that no investigation of the cause of death is required, and
  - Whenever the Native American Heritage Commission receives notification of a discovery of Native American human remains from the Los Angeles County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. If the remains are of Native American origin, the descendants from the deceased Native Americans shall complete their inspection and make recommendations or preferences in writing to the landowner or the person responsible for the excavation work, for treatment or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

Tier II

Paleontological Resources

Measure Cultural-1

The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation of unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located 15 or more feet below the ground surface that would have the potential to contact extant older Quaternary Alluvium. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, the County of Los Angeles shall require and be responsible for salvage and

recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology:

- Paleontological Resources Sensitivity Training is required for all project personnel prior to the start of ground-disturbing activities. This brief (approximately 15 minute) field training reviews what fossils are, what fossils might potentially be found, and the appropriate procedures to follow if fossils are found.

- Prior to any ground-disturbing activities, the County of Los Angeles shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain unique paleontological resources.

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data.

- All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the County of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when

submitted to the County of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources.

Human Remains

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Although the discovery of human remains is not anticipated during ground-disturbing activities for the proposed project, a process has been delineated for addressing the unanticipated discovery of human remains:

- Unanticipated Discovery of Human Remains (Public Resources Code 5097). The Los Angeles County Coroner shall be notified within 24 hours of the discovery of human remains. Upon discovery of human remains, there shall be no further excavation or disturbance of the site or any of that area reasonably suspected to overlie adjacent human remains until the following conditions are met:

  - The Los Angeles County Coroner has determined that no investigation of the cause of death is required, and
  - Whenever the Native American Heritage Commission receives notification of a discovery of Native American human remains from the Los Angeles County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. If the remains are of Native American origin, the descendants from the deceased Native Americans shall complete their inspection and make recommendations or preferences in writing to the landowner or the person responsible for the excavation work, for treatment or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

Historical Resources

Potentially significant adverse impacts to historical resources have been identified in relation to five historical resources as a result of implementation of the Tier II project:, the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium. Three mitigation measures have been identified in association with Tier II to reduce impacts to the maximum extent practicable. In the event that the five historical resources are not removed or otherwise impacted through significant modifications or alterations to the character-defining features of these resources, this impact would be less than significant and would not require mitigation.

Measure Cultural-3

Tier II impacts to four significant historical resources (Multi-Service Ambulatory Care Center [MACC], Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium) and the integrity of the Martin Luther King, Jr. Medical Center Campus Historic District (a fifth historic resource) shall be reduced to below the level of significance through utilization of the *Secretary of the Interior's Standards for the*

Treatment of Historic Properties with Guidelines of Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings for any proposed alterations, including all site work, structural upgrades, architectural, and mechanical systems improvements and repairs. The work shall conform to the standards and guidelines for "rehabilitation." Conformance with the Secretary of the Interior's Standards shall be monitored by an architectural historian or historic architect who meets the Secretary of the Interior's Professional Qualification Standards. Completion of this mitigation measure shall be monitored and enforced by the County of Los Angeles.

Measure Cultural-4

Tier II impacts resulting from demolition or substantial alteration of significant historical resources not in conformance with the Secretary of the Interior's Standards shall be reduced to the maximum extent feasible through archival documentation of as-found condition. Prior to the initiation of construction activities, the County of Los Angeles shall ensure that documentation of the Martin Luther King, Jr. Medical Center Campus Historic District, Multi-Service Ambulatory Care Center (MACC), Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and/or Dr. H. Claude Hudson Auditorium is completed in accordance with Historic American Buildings Survey (HABS) requirements for donated material. The documentation shall be in the form of a Historic American Building Survey and shall comply with the *Secretary of the Interior's Standards for Architectural and Engineering Documentation*. The documentation shall include large-format photographic recordation, detailed historic narrative report, measured architectural drawings, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The original archival-quality documentation shall be offered as donated material to Historic American Building Survey for inclusion in the Library of Congress. Archival copies of the documentation also would be available at the Martin Luther King, Jr. Medical Center campus and maintained by the County of Los Angeles.

Measure Cultural-5

Impacts resulting from the loss of integrity of the Martin Luther King, Jr. Medical Center Campus Historic District such that its significance is materially impaired will be reduced to the maximum extent feasible through the development of a retrospective exhibit detailing the history of the Martin Luther King, Jr. Medical Center Campus Historic District, its significance, and its important details and features. The retrospective exhibit shall be in the form of a physical exhibit installed on the Martin Luther King, Jr. Medical Center Campus, which is located either within a building or on a freestanding kiosk or comparable structure or installation on the property. The exhibit should commemorate the historic appearance of the district and provide the public with sufficient information to understand its historic significance.

The exhibit shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The exhibit should be completed within a period of no more than two years from the date of completion of Tier II of the proposed project.

3.3.6 Level of Significance after Mitigation

Tier I

Implementation of mitigation measure Cultural-1 would reduce any potential significant impacts to cultural resources related to an adverse change in the significance of a unique paleontological resource discovered under Tier I to below the level of significance.

Implementation of mitigation measure Cultural-2 would reduce any potential significant impacts to human remains discovered under Tier I to below the level of significance.

Tier II

Implementation of mitigation measure Cultural-1 would reduce any potential significant impacts to cultural resources related to an adverse change in the significance of a unique paleontological resource discovered under Tier II to below the level of significance.

Implementation of mitigation measure Cultural-2 would reduce any potential significant impacts to human remains discovered under Tier II to below the level of significance.

Implementation of mitigation measure Cultural-3 would reduce Tier II impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium as a result of Tier II of the proposed project to below the level of significance.

Implementation of mitigation measures Cultural-4 and Cultural-5 would reduce Tier II impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium as a result of Tier II of the proposed project to the maximum extent feasible. However, the demolition of a historical resource still would remain a significant adverse impact.

3.4 GEOLOGY AND SOILS

As a result of the Initial Study,[1] the County of Los Angeles (County) has determined that the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in impacts to geology and soils. Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potentially significant impacts from geology and soils.

The analysis of geology and soils consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the proposed project area, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential for impacts to geology and soils has been analyzed in accordance with the methodologies and information provided by the Safety element of the County of Los Angeles General Plan,[2] publications of the California Geological Society (formerly known as California Division of Mines and Geology), geotechnical reports,[3,4] and published maps.

3.4.1 Regulatory Framework

This regulatory framework identifies the state and local statutes and policies that relate to geology and soils and must be considered by the County during the decision-making process for projects that involve grading (excavation or fill), modification of existing structures, or construction of new structures.

State

State of California Geological Survey

The State of California Geological Survey (CGS; formerly CDMG, California Division of Mines and Geology) identifies several earth resource issues that should be taken into consideration when evaluating whether the proposed project would likely be subject to geologic hazards, particularly related to earthquake damage. These considerations include both the potential for existing geologic and soil conditions to pose a risk to the project and the potential for the proposed project to result in an impact to the existing geologic and soil conditions by creating or exacerbating a geologic hazard.

The CGS establishes regulations related to geologic hazards (e.g., faulting, liquefaction, seismically induced landslides, and ground shaking) as they impact people and structures. These regulations include the Alquist-Priolo Earthquake Fault Zone (APEFZ) Act and Seismic Hazards Mapping Program

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[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

[2] County of Los Angeles Department of Regional Planning. December 1990. *County of Los Angeles General Plan, Safety Element*. Los Angeles, CA.

[3] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[4] URS. 14 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed ED/Ancillary Building and Central Plant Expansion, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

(SHMP), described below. The CGS also issues guidelines for the evaluation of geologic and seismic factors that may impact a project or that may be impacted by a project. The guidelines that are most applicable are the following:

- CDMG Special Publication 42, Guidelines to Geologic/Seismic Reports[5]
- CDMG Special Publication 46, Guidelines for Geologic/Seismic Considerations in Environmental Impact Reports[6]
- CDMG Note 49, Guidelines for Evaluating the Hazard of Surface Fault Rupture[7]

Each guideline provides checklists and outlines to help ensure a comprehensive report of geologic and seismic conditions. Although not mandatory in all their detail, these guidelines provide assistance in assuring completeness of geologic and seismic studies conducted for a project.

Alquist-Priolo Earthquake Fault Zone Act of 1972

The CGS has delineated special study zones along known active or potentially active faults in California pursuant to the APEFZ Act of 1972.[8] The state delegates the authority to local government to regulate development within APEFZ. Construction of habitable structures is not permitted over potential rupture zones. The proposed project site is located approximately 1.8 miles northeast of the Newport-Inglewood Alquist-Priolo Fault Zone.[9] The proposed project site is roughly 42 miles south of the active San Andreas Fault.[10]

Alquist Hospital Seismic Safety Act of 1983

The Alquist Act establishes a seismic safety building standards program under the Office of Statewide Health Planning and Development's (OSHPD) jurisdiction for hospitals built on or after March 7, 1973.[11] The Alquist Act was initiated because of the loss of life incurred due to the collapse of hospitals during the Sylmar earthquake of 1971. The Alquist Act emphasizes that essential facilities such as hospitals should remain operational after an earthquake. Hospitals built in accordance with the standards of the Alquist Act resisted the January 1994 Northridge earthquake with minimal structural damage, while several facilities built prior to the act experienced major structural damage and had to be evacuated. The provisions and subsequent regulation language of the act were developed to address the issues of survivability of both nonstructural and structural components of hospital buildings after a seismic event. Therefore, the ultimate public safety benefit of the act is to have general acute

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[5] California Geological Survey. 1997 (Revised). *Fault-Rupture Hazard Zones in California*. Special Publication 42. Supplements 1 and 2 added 1999. Contact: 655 S. Hope Street, #700, Los Angeles, CA 90017.

[6] California Geological Survey, 1986. *Guidelines for Geologic/Seismic Considerations in Environmental Impact Reports. Special Publication No. 46*. Contact: 801 K Street, MS 14-33, Sacramento, CA 95814-3531.

[7] California Geological Survey. 1998. *Guidelines for Evaluating the Hazard of Surface Fault Rupture*. Note 49. Contact: 801 K Street, MS 14-33, Sacramento, CA 95814-3531.

[8] *California Public Resources Code*, § 2621 et. seq.: *Alquist-Priolo Earthquake Fault Zoning Act*.

[9] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[10] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[11] Office of Statewide Health Planning and Development. *Seismic Retrofit Program Overview*. Available at: http://www.oshpd.ca.gov/FDD/seismic_compliance/index.html

care hospital buildings that not only are capable of remaining intact after a seismic event, but also of continued operation and provision of acute care medical services.

OSHPD has requirements for building design and rates buildings on a number of categories according to the anticipated ability of a building to withstand seismic activity. These categories include structural performance category (SPC) ranks that are number SPC-1 through SPC-5, SPC-1 consists of buildings that pose a significant risk of collapse and pose a danger to the public; conversely, SPC-5 level buildings are in compliance with the structural provisions of the Alquist Hospital Facilities Seismic Safety Act, and are reasonable capable of providing services to the public following "strong ground motion". OSHPD provides permits to buildings. Nonstructural performance category (NPC) ranks are also provided for buildings and range from levels 1 through 5.[12]

Seismic Hazards Act of 1990

The CGS has also identified Seismic Hazard Zones that are delineated in accordance with the SHMP of the Seismic Hazards Act (Act) of 1990.[13] The Act is "to provide for a statewide seismic hazard mapping and technical advisory program to assist cities and counties in fulfilling their responsibilities for protecting the public health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and other seismic hazards caused by earthquakes." The proposed project site is depicted on the South Gate 7.5-minute Quadrangle Seismic Hazard Zone Map[14] within an area designated where the historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacement such that mitigation may be required.

State of California (Uniform) Building Code

The State of California Building Code (California Building Code) sets standards for investigation and mitigation of the site conditions related to fault movement, liquefaction, landslides, differential compaction/seismic settlement, ground rupture, ground shaking, tsunami, seiche, and seismically induced flooding.[15] Mitigation of geological (including earthquake) and soil (geotechnical) issues must be undertaken in compliance with the California Building Code (CBC). The California Building Code augments and supersedes the Uniform Building Code (UBC) with stricter requirements to reduce the risks associated with buildings in Seismic Zone 4 to the maximum extent practicable. The majority of the State of California, including the proposed project site, lies within Seismic Zone 4,[16] the highest level hazard zone designated by the current UBC.

Local

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[12] The Office of Statewide Health Planning and Development. 23 October 2008 (Accessed August 2010). *2007 California Buildings Standards Administrative Code*, Chapter 6 *Seismic Evaluation Procedures for Hospital Buildings*. Available at: http://www.oshpd.ca.gov/FDD/seismic_compliance/SB1953/2007%20Title%2024,%20Part%201,%20Ch.%206%20with%20S&E%20thru%20Er010110.pdf

[13] *California Public Resources Code*, § 2690 et. seq.: *Seismic Hazards Mapping Act*.

[14] California Geological Survey. 25 March 1999. Seismic Hazard Zone Map, South Gate Quadrangle. Also available at: California Department of Conservation. 2006. California Geological Survey Seismic Hazard Zonation Program (SHZP) Data Access Page. Available at: http://gmw.consrv.ca.gov/shmp/MapProcessor.asp?Action=Quad&Location=SoCal

[15] *California Code of Regulations*, 1 November 2002 (Effective Date). Title 24: California Building Standards Code. Sacramento, CA: California Building Standards Commission. Available at: www.bsc.ca.gov.

[16] *California Code of Regulations*, 1 November 2002 (Effective Date). Title 24: California Building Standards Code. Sacramento, CA: California Building Standards Commission. Available at: www.bsc.ca.gov.

County of Los Angeles General Plan

The Safety element of the County of Los Angeles General Plan includes additional regulations governing the proposed project related to geotechnical issues, particularly for new development.

Seismic Hazards

The overall goal in addressing seismic hazards is to minimize injury and loss of life, property damage, and the social, cultural, and economic impacts caused by earthquake hazards. The relevant policies established to attain this goal in the County of Los Angeles are as follows:

- Review projects proposing expansion of existing development and construction of new development, especially critical facilities, and encourage them to avoid localities exposed to high earthquake hazards through such techniques as cluster development and transfer of development rights.
- Continue enforcement of stringent site investigations (such as seismic, geologic, hydrologic, and soils investigations) and mitigation measures for development projects in areas of high earthquake hazard, especially those involving critical facilities. Do no approve proposals and projects that cannot mitigate safety hazards to the satisfaction of responsible agencies.
- Promote the development of seismically resistant major lifelines serving Los Angeles County and connecting it to surrounding regions and the rest of the nation.
- Promote strengthening or replacement of critical facilities; and the retrofitting or abatement of potentially hazardous buildings, highway structures, and dams and reservoirs that do not meet seismic safety standards.
- Encourage the preservation and sensitive reuse of historic buildings that need strengthening for protection from seismic hazards, in a manner that does not endanger public safety.
- Strengthen earthquake resistance standards for non-structural components, especially in critical facilities.

Geologic Hazards

The overall goal in addressing geologic hazards is to protect public safety and minimize the social and economic impacts from geologic hazards. The relevant policy established to attain this goal in the County of Los Angeles is as follows:

- Review proposals and projects proposing new development and expansion of existing development in areas susceptible to landsliding, debris flow, and rockfalls, and in areas where collapsible or expansive soils are a significant problem; and disapprove projects that cannot mitigate these hazards to the satisfaction of responsible agencies.

Los Angeles County Building Code

The County of Los Angeles has adopted the California Building Code, described above, as the means of evaluating the adequacy of geotechnical and engineering geology studies needed for design and construction in the County. Some jurisdictions have adopted local building codes that amplify the California Building Code to reflect geotechnical conditions in that area. These building codes would usually be available as a separate ordinance, such as a Zoning or Grading Ordinance.

3.4.2 Existing Conditions

3.4.2.1 Physiography and Topography

The proposed project site is located within the northern portion of the Peninsular Ranges Geomorphic Province, which is characterized by a series of generally northwest-trending mountain ranges and intervening valleys. The northern portion of the peninsular Ranges Province, generally referred to as the Los Angeles Basin, is a broad sediment filled trough.[17]

The site lies within the central portion of the Los Angeles Basin, which is underlain by over 1,000 feet of sediments that have been deposited within this down-warped basin since Pliocene time. Underlying these alluvial deposits is Pliocene age marine sediments deposited during a time when a shallow sea covered much of southern California.

The hills bordering this area of the Los Angeles Basin are characterized by a complex sequence of Cretaceous to Pleistocene age marine and nonmarine sedimentary rocks. Localized igneous intrusive rocks attest to the complex geologic history of the area. Erosion of the hills within the Santa Monica Mountains, located to the north of the site, is the source for the broad alluvial deposits forming much of the Los Angeles Basin to the south.

The existing ground of the proposed project site has elevations ranging from approximately 86 to 88[18] feet above mean sea level (MSL). The proposed project site has the highest elevation at the eastern edge of the site; the elevation then dips towards the south and west.

3.4.2.2 Surficial Geologic Units

The proposed project site is directly underlain by artificial fill and relatively younger alluvial deposits (Qya2), overlying more consolidated older alluvium. These deposits are representative of alluvial outwash associated with transport and deposition of the ancestral Los Angeles River. These soils generally consist of medium dense interbedded clayey silts, silty clays and sandy silts, and silty sands.[19]

3.4.2.3 Faulting and Seismicity

The Los Angeles Basin, as well as most of Southern California, is located within a complex zone of faults and folds resulting from compressional forces occurring along a bend within the boundary between the Pacific and North American tectonic plates. Numerous generally east-west to northwest trending faults have formed as a result of these north-south compressional forces acting within this area. The major faults within the vicinity of the Los Angeles Basin are characterized by a combination blind thrusting, which is a rupture that is located below the uppermost layers of rock and would not be present on the surface; right-lateral strike-slip, a displacement in a trend or bearing where the right

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[17] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California.* Los Angeles, CA.

[18] Sapphos Environmental, Inc. 2010. Geographic Information System. Pasadena, CA.

[19] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California.* Los Angeles, CA.

block moves toward you and the back block moves away; and reverse faulting, where the rock layer above the fault moves up.[20]

Most of the larger earthquakes in the region have been associated with larger faults that have been mapped at the ground surface. A number of moderate to large earthquakes in the region have also occurred on deep-seated buried thrust faults in this geological complex region of Southern California. The most recent significant (moderate to large) earthquake was the magnitude 6.7 (M) Northridge earthquake, which occurred on a shallowly south-dipping thrust fault that underlies much of the San Fernando Valley.

As previously noted, the closest active fault to site is the Newport-Inglewood fault, located approximately 1.8 miles to the southwest. The historically active San Andreas Fault is located approximately 42 miles to the north.[21]

The Richter Magnitude Scale (Richter Scale) was developed as a mathematical device to compare the size of earthquakes. The Richter Scale does not measure damage. The Richter magnitude is computed based on information gathered on seismograph instruments. Because the Richter Scale is based on a logarithmic scale, or base 10-scale, each whole number increase in magnitude represents a tenfold increase in measured amplitude, or height, of the earthquake wave. As an estimate of energy, each whole number step in the magnitude scale corresponds to the release of about 10 times more energy than the amount associated with the preceding whole number value.

3.4.2.4 Soils

Soils at the proposed project site include fill materials consisting of sandy silt and clay ranging from zero to 15 feet below grade surface (bgs) and alluvium consisting of stiff clay ranging from 15 to 20 feet bgs, medium dense clayey sand and stiff sandy clay from 20 to 35 bgs, medium dense silty sand and sandy silt from 35 to 45 feet bgs, and very stiff silt and clay or dense sand from 45 to 55 feet bgs.[22]

3.4.2.5 Hydrology

The depth to groundwater at the proposed project site has been encountered at 38 to 52 feet below ground surface.[23] The existing use of the proposed project site does not influence the local groundwater basin. The site also does not serve as a groundwater recharge site.

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[20] USGS. Accessed 12 May 2010. *Earthquake Hazards Program: Earthquake Glossary*. Available at: http://earthquake.usgs.gov/learn/glossary/

[21] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[22] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[23] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

3.4.3 Significance Thresholds

The potential for the proposed project to result in impacts related to geology and soils was analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines. The proposed project would normally be considered to have a significant impact to geology and soils when the potential for any one of the following four thresholds occurs:

- Expose people or structures to potential substantial adverse effects, including the risk for loss, injury, or death involving:
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault
  - Strong seismic ground shaking
  - Seismic-related ground failure, including liquefaction
  - Landslides
- Result in substantial soil erosion (greater than 10 percent) or the loss of topsoil
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property

3.4.4 Impact Analysis

3.4.4.1 Surface Fault Rupture

Tier I

Tier I of the proposed project would not be expected to result in significant impacts related to surface fault rupture. Faults are the planes along which earthquakes occur. Where earthquakes are large enough, or shallow enough, surface rupture can occur along the fault plane where it intersects the earth's surface. There are no known surface faults within the proposed project site, and the proposed project site does not lie within an APEFZ.[24] Therefore, Tier I of the proposed project would not be expected to result in significant impacts to geology and soils related to the risk of exposure to surface fault rupture.

Tier II

Tier II of the proposed project would not be expected to result in significant impacts related to surface fault rupture. Faults are the planes along which earthquakes occur. Where earthquakes are large enough, or shallow enough, surface rupture can occur along the fault plane where it intersects the earth's surface. There are no known surface faults within the proposed project site, and the proposed

[24] California Geological Survey. Revised 2007. *Fault-Rupture Hazard Zones in California*. Special Publication 42. Sacramento, CA. Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf

project site does not lie within an APEFZ.[25] Therefore, Tier II of the proposed project would not be expected to result in significant impacts to geology and soils related to the risk of exposure to surface fault rupture.

3.4.4.2 Seismic Ground Shaking

Tier I

Tier I of the proposed project would not be expected to result in significant impacts from strong seismic ground shaking. The proposed project would be expected to result in less than significant impacts with regard to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. As previously mentioned, the proposed project site is located approximately 1.8 miles to the northeast of the Newport-Inglewood Fault Zone and is situated within a seismically active region (Seismic Zone 4) that could potentially result in impacts from seismic shaking. However, conforming to applicable requirements under the CBC and UBC would reduce impacts from strong seismic ground shaking to the maximum extent possible under currently accepted engineering practices. Therefore, Tier I of the proposed project would be expected to result in less than significant impacts related to exposing people or structures to strong seismic ground shaking.

The inpatient care portions of the proposed project must also be in compliance with the Alquist Act of 1983, which establishes a seismic safety building standards program under the OSHPD's jurisdiction for hospitals built on or after March 7, 1973.[26] The Act states that essential facilities such as hospitals should remain operational after an earthquake. The provisions and subsequent regulation language of the Act were developed to address the issues of survivability of both nonstructural and structural components of hospital buildings after a seismic event. The benefit of the Act is to have general acute care hospital buildings that not only are capable of remaining intact after a seismic event, but also of continued operation and provision of acute care medical services.

Tier II

Tier II of the proposed project would not be expected to result in significant impacts from strong seismic ground shaking. The proposed project would be expected to result in less than significant impacts with regard to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. As previously mentioned the proposed project site is located approximately 1.8 miles to the northeast of the Newport-Inglewood Fault Zone and is situated within a seismically active region (Seismic Zone 4) that could potentially result in impacts from seismic shaking. However, conforming to applicable requirements under the CBC and UBC would reduce impacts from strong seismic ground shaking to the maximum extent possible under currently accepted engineering practices. Therefore, Tier II of the proposed project would be expected to result in less than significant impacts related to exposing people or structures to strong seismic ground shaking.

The inpatient care portions of the proposed project must also be in compliance with the Alquist Act of 1983, which establishes a seismic safety building standards program under the OSHPD's jurisdiction

[25] California Geological Survey. Revised 2007. *Fault-Rupture Hazard Zones in California*. Special Publication 42. Sacramento, CA. Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf

[26] Office of Statewide Health Planning and Development. *Seismic Retrofit Program Overview*. (Accessed July 2010). Available at: http://www.oshpd.ca.gov/FDD/seismic_compliance/index.html.

for hospitals built on or after March 7, 1973.[27] The Act states that essential facilities such as hospitals should remain operational after an earthquake. The provisions and subsequent regulation language of the Act were developed to address the issues of survivability of both nonstructural and structural components of hospital buildings after a seismic event. The benefit of the Act is to have general acute care hospital buildings that not only are capable of remaining intact after a seismic event, but also of continued operation and provision of acute care medical services.

3.4.4.3 Seismic-Related Ground Failure/Liquefaction

Tier I

Tier I of the proposed project would be expected to result in less than significant impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. According to the California Geological Survey,[28] the proposed project site is located within a Seismic Hazard Zone for liquefaction, which indicates a potential for permanent ground displacements such that methods, as defined in Public Resources Code Section 2693(c), would be required to be implemented into the proposed project.[29] However, the proposed project's compliance with the CBC, UBC, and OSHPD standards, which are designed to mitigate, reduce, or avoid significant seismic-related ground failure / liquefaction risks, would significantly reduce any potential for impacts resulting from liquefaction during a seismic event. Therefore, Tier I of the proposed project would be expected to result in less than significant impacts from exposing people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction.

Tier II

Tier II of the proposed project would be expected to result in less than significant impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. According to the California Geological Survey,[30] the proposed project site is located within a Seismic Hazard Zone for liquefaction, which indicates a potential for permanent ground displacements such that methods, as defined in Public Resources Code Section 2693(c), would be required to be implemented into the proposed project.[31] However, the proposed project's compliance with the CBC, UBC, and OSHPD standards, which are designed to mitigate, reduce, or avoid significant seismic-related ground failure / liquefaction risks, would significantly reduce any potential for impacts resulting from liquefaction during a seismic event. Therefore, Tier II of the proposed project would be expected to result in less than significant impacts from exposing people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction.

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[27] Office of Statewide Health Planning and Development. *Seismic Retrofit Program Overview*. (Accessed July 2010). Available at: http://www.oshpd.ca.gov/FDD/seismic_compliance/index.html.

[28] California Geological Survey. Revised February 2009. Seismic Hazards Zonation Program, Seismic Hazard Zone Map, South Gate. Available at: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sgate.pdf

[29] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[30] California Geological Survey. Revised February 2009. Seismic Hazards Zonation Program, Seismic Hazard Zone Map, South Gate. Available at: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sgate.pdf

[31] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

3.4.4.4 Landslides

Tier I

Tier I of the proposed project would not be expected to result in impacts related to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. The topography of the proposed project site and surrounding area can be characterized as flat, and therefore would pose no potential risk for natural landslides to occur. Should subterranean excavation be required, the proposed project development will conform to applicable requirements under the CBC and UBC (e.g., shoring), to reduce impacts from potential instability of any manmade excavations during construction to the maximum extent possible under currently accepted engineering practices. Moreover, no areas susceptible to seismic-induced landslides are shown in the proposed project vicinity on the USGS 7.5-minute series South Gate topographic quadrangle.[32] Therefore, due to the absence of steep slopes, and building code requirements for excavations, there would be no expected impacts from exposing people or structures to potentially substantial adverse effects involving landslides.

Tier II

Tier II of the proposed project would not be expected to result in impacts related to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. The topography of the proposed project site and surrounding area can be characterized as flat, and therefore would pose no potential risk for natural landslides to occur. Should subterranean excavation be required, the proposed project development will conform to applicable requirements under the CBC and UBC (e.g., shoring), to reduce impacts from potential instability of any manmade excavations during construction to the maximum extent possible under currently accepted engineering practices. Moreover, no areas susceptible to seismic-induced landslides are shown in the proposed project vicinity on the USGS 7.5-minute series South Gate topographic quadrangle.[33] Therefore, due to the absence of steep slopes, and building code requirements for excavations, there would be no expected impacts from exposing people or structures to potentially substantial adverse effects involving landslides.

3.4.4.5 Soil Erosion

Tier I

Tier I of the proposed project would be expected to result in potentially significant impacts related to substantial soil erosion or loss of topsoil that would be reduced to below the level of significance with the incorporation of mitigation measures. It is anticipated that there would be grading associated with the reuse or replacement of the existing Multi-Service Ambulatory Care Center (MACC) and construction of the new MACC, Ancillary Building, and other site improvements. It is anticipated that the construction contractor would incorporate best management practices (BMPs) consistent with the guidelines provided in the *California Storm Water Best Management Practice Handbooks:*

[32] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[33] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

Construction.[34] As discussed in the Geotechnical Engineering Investigation that was prepared for the proposed project site,[35] earthwork at the proposed project site should be performed in conformance with the Los Angeles County Building Code, and under the observation and testing of a geotechnical engineer, in order to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills.[36] However, mitigation would be required to ensure that these and other procedures applicable during construction of Tier I of the proposed project would be implemented where required. Therefore, impacts related to substantial soil erosion or the loss of topsoil would be reduced to below the level of significance by the incorporation of the specified mitigation measures.

Tier II

Tier II of the proposed project would be expected to result in potentially significant impacts related to substantial soil erosion or loss of topsoil that would be reduced to below the level of significance with the incorporation of mitigation measures. It is anticipated that there would be grading associated with the construction and development related to the campus-wide Master Plan. It is anticipated that the construction contractor would incorporate BMPs consistent with the guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction*.[37] As discussed in the Geotechnical Engineering Investigation that was prepared for the proposed project site,[38] earthwork at the proposed project site should be performed in conformance with the Los Angeles County Building Code, and under the observation and testing of a geotechnical engineer, in order to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills.[39] However, mitigation would be required to ensure that these and other procedures applicable during construction of Tier II of the proposed project would be implemented where required. Therefore, impacts related to substantial soil erosion or the loss of topsoil would be reduced to below the level of significance by the incorporation of the specified mitigation measures.

3.4.4.6 Stability of Geology and Soils

Tier I

Tier I of the proposed project would be expected to result in potentially significant impacts related to being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence,

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[34] California Stormwater Quality Association. 2003. *California Stormwater Best Management Practice Handbooks: Construction*. Menlo Park, CA. Available at: http://www.cabmphandbooks.com/Documents/Construction/Section_3.pdf

[35] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[36] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[37] California Stormwater Quality Association. 2003. *California Stormwater Best Management Practice Handbooks: Construction*. Menlo Park, CA. Available at: http://www.cabmphandbooks.com/Documents/Construction/Section_3.pdf

[38] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[39] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

liquefaction, or collapse, that would be reduced to below the level of significance with the incorporation of mitigation measures. According to the California Geological Survey,[40] the proposed project site is located within a Seismic Hazard Zone for liquefaction,[41] which indicates a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required. It is anticipated that due to seismic compliance standards established by the OSHPD, the proposed project would incorporate project design elements consistent with OSHPD standards, and that this, in addition to adherence to applicable requirements of the CBC, UBC, and the methods and specifications of the project geotechnical report(s), would further reduce any potential for impacts resulting from unstable geologic units and soils. However, the County's conformance with guidelines described in the geotechnical study would need to be verified to ensure compliance throughout the construction and development of the proposed project. Therefore, impacts related to being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse would be expected to be reduced to below the level of significance with the incorporation of mitigation measures.

Tier II

Tier II of the proposed project would be expected to result in potentially significant impacts related to being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, that would be reduced to below the level of significance with the incorporation of mitigation measures. According to the California Geological Survey,[42] the proposed project site is located within a Seismic Hazard Zone for liquefaction,[43] which indicates a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required. It is anticipated that due to seismic compliance standards established by the OSHPD, the proposed project would incorporate project design elements consistent with OSHPD standards, and that this, in addition to adherence to applicable requirements of the CBC, UBC, and the methods and specifications of the project geotechnical report(s), would further reduce any potential for impacts resulting from unstable geologic units and soils. However, the County's conformance with guidelines described in the geotechnical study would need to be verified to ensure compliance throughout the construction and development of the proposed project. Therefore, impacts related to being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse would be expected to be reduced to below the level of significance with the incorporation of mitigation measures.

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[40] California Geological Survey. Revised February 2009. Seismic Hazards Zonation Program, Seismic Hazard Zone Map, South Gate. Available at: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sgate.pdf

[41] URS. 14 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed ED/Ancillary Building and Central Plant Expansion, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California.* Los Angeles, CA.

[42] California Geological Survey. Revised February 2009. Seismic Hazards Zonation Program, Seismic Hazard Zone Map, South Gate. Available at: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sgate.pdf

[43] URS. 14 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed ED/Ancillary Building and Central Plant Expansion, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California.* Los Angeles, CA.

3.4.4.7 Expansive Soil

Tier I

Tier I of the proposed project would be expected to result in potentially significant impacts related to being located on expansive soil, creating substantial risks to life or property that would be reduced to below the level of significance with the incorporation of mitigation measures. It is anticipated that there would be grading and earthwork performed under construction, improvements, and renovations to Tier I the proposed project. Where any grading-related work is required, a geotechnical engineer should be available for observation of these tasks to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. Any unanticipated adverse conditions encountered would be evaluated by the proposed project engineering geologist and the soil engineer. Mitigation would be required to ensure that these and other methods and specifications of the project geotechnical report are implemented during construction of the proposed project. Therefore, impacts related to being located on expansive soil and thereby creating substantial risks to life or property would be reduced to below the level of significance by the incorporation of the specified mitigation measures.

Tier II

Tier II of the proposed project would be expected to result in potentially significant impacts related to being located on expansive soil, creating substantial risks to life or property that would be reduced to below the level of significance with the incorporation of mitigation measures. It is anticipated that there would be grading and earthwork performed under construction, improvements, and renovations to Tier II of the proposed project. Where any grading-related work is required, a geotechnical engineer should be available for observation of these tasks to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. Any unanticipated adverse conditions encountered would be evaluated by the proposed project engineering geologist and the soil engineer. Mitigation would be required to ensure that these and other methods and specifications of the project geotechnical report are implemented during construction of the proposed project. Therefore, impacts related to being located on expansive soil and thereby creating substantial risks to life or property would be reduced to below the level of significance by the incorporation of the specified mitigation measures.

3.4.4.8 Septic Tanks or Alternative Wastewater Disposal Systems

Tier I

Tier I of the proposed project would not be expected to result in impacts to geology and soils in relation to being located on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The proposed project would not require the use of septic tanks or alternative wastewater disposal systems. Sewers are available for wastewater disposal at the proposed project site. Furthermore, wastewater generated at the proposed project would be treated at the Hyperion Treatment Plant.[44] The Hyperion Treatment Plant currently supports wastewater leaving the proposed project site and would continue to do so following the development of the proposed project. The Hyperion Treatment Plant is anticipated to have the capacity to support the proposed project (see Section 3.16, *Utilities and Service*

[44] Sanitation Districts of Los Angeles County. Accessed 7 October 2009. Web site. *Joint Water Pollution Control Plant*. Available at: http://www.lacsd.org/about/wastewater_facilities/jwpcp/default.asp

Systems). Therefore, Tier I of the proposed project would not be expected to result in impacts to geology and soils related to the adequate use of septic tanks or alternative wastewater disposal systems.

Tier II

Tier II of the proposed project would not be expected to result in impacts to geology and soils in relation to being located on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The proposed project would not require the use of septic tanks or alternative wastewater disposal systems. Sewers are available for wastewater disposal at the proposed project site. Furthermore, wastewater generated at the proposed project would be treated at the Hyperion Treatment Plant.[45] The Hyperion Treatment Plant currently supports wastewater leaving the proposed project site and would continue to do so following the development of the proposed project. The Hyperion Treatment Plant is anticipated to have the capacity to support the proposed project (see Section 3.16). Therefore, Tier II of the proposed project would not be expected to result in impacts to geology and soils related to the adequate use of septic tanks or alternative wastewater disposal systems.

3.4.4.9 Cumulative Impacts

The incremental impacts of the proposed project to geology and soils, when added to the related past, present, or reasonably foreseeable, probable future projects listed in Section 2.0, *Project Description*, would not be expected to be significant. Because the geology and soils impacts expected from the implementation of the proposed project do not affect lands outside the boundaries of the proposed project site, these impacts do not create any cumulative impacts on the environment outside of the proposed project boundaries.

Tier I

It is anticipated that development of the proposed project would be completed in compliance with required guidelines. Additionally, the forty-two (42) cumulative related projects would be subject to comparable guidelines, designed to prevent, reduce, or minimize potential geology impacts at the proposed project site and within the surrounding community. As a hospital facility, the proposed project would be designed to provide medical services in the event of a geological event and as such would not adversely contribute cumulative impacts. Additionally, Tier I of the proposed project would be limited in its site disturbance to the proposed project site and the implementation of BMPs and sustainable design measures would ensure that Tier I would not contribute to cumulative impacts.

Tier II

It is anticipated that development of the proposed project would be completed in compliance with required guidelines. Additionally, the forty-two (42) cumulative related projects would be subject to comparable guidelines, designed to prevent, reduce, or minimize potential geology impacts at the proposed project site and within the surrounding community. As a hospital facility, the proposed project would be designed to provide medical services in the event of a geological event and as such would not adversely contribute cumulative impacts. Additionally, BMPs and sustainable design measures would be instituted into the proposed project that would further reduce the potential for the

[45] Sanitation Districts of Los Angeles County. Accessed 7 October 2009. Web site. *Joint Water Pollution Control Plant*. Available at: http://www.lacsd.org/about/wastewater_facilities/jwpcp/default.asp

proposed project to contribute to other impacts such as soil erosion and loss of topsoil at the proposed project site or the surrounding neighborhood. As such, Tier II of the proposed project would not contribute to cumulative impacts.

3.4.5 Mitigation Measures

Implementation of the following mitigation measures are recommended to avoid, reduce, or eliminate the potential impacts related to geology and soils. As described above, potential impacts to soil erosion or loss of topsoil, unstable geologic unit or soil, and expansive soil would be reduced to below the level of significance through the implementation of California Building Code and other standard design measures required for permit approval.

Tier I

Measure Geology-1

The construction contractor shall incorporate best management practices consistent with the guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction*.[46] As discussed in the Geotechnical Investigation that was prepared for the project site, earthwork at the project site should be performed in conformance with the Los Angeles County Building Code and other guidelines provided in the geotechnical study, and under the observation and testing of a geotechnical engineer, in order to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills.

Measure Geology-2

Due to seismic compliance standards established by the Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or as required, the construction contractor shall incorporate project design elements consistent with Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or required standards, and thus further reduce any potential for impacts resulting from unstable geologic units and soils. The County of Los Angeles shall conform to measures described in the project geotechnical study(ies) to ensure compliance throughout the construction and development of the project.

Measure Geology-3

A geotechnical engineer shall be present on site for observation of earth-moving activities (such as site preparation, excavation) to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. Any unanticipated adverse conditions encountered shall be evaluated by the project engineering geologist and the soil engineer.

[46] California Stormwater Quality Association. 2003. *California Stormwater Best Management Practice Handbooks: Construction*. Menlo Park, CA. Available at: http://www.cabmphandbooks.com/Documents/Construction/Section_3.pdf

Tier II

Measure Geology-1

The construction contractor shall incorporate best management practices consistent with the guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction*.[47] As discussed in the Geotechnical Investigation that was prepared for the project site, earthwork at the project site should be performed in conformance with the Los Angeles County Building Code and other guidelines provided in the geotechnical study, and under the observation and testing of a geotechnical engineer, in order to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills.

Measure Geology-2

Due to seismic compliance standards established by the Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code,, or as required, the construction contractor shall incorporate project design elements consistent with Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or required standards, and thus further reduce any potential for impacts resulting from unstable geologic units and soils. The County of Los Angeles shall conform to measures described in the project geotechnical study(ies) to ensure compliance throughout the construction and development of the project.

Measure Geology-3

A geotechnical engineer shall be present on site for observation of earth moving activities (such as site preparation, excavation) to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. Any unanticipated adverse conditions encountered shall be evaluated by the project engineering geologist and the soil engineer.

3.4.6 Level of Significance after Mitigation

Tier I

Implementation of mitigation measure Geology-1 would reduce significant impacts of Tier I related to soil erosion or loss of topsoil to below the level of significance.

Implementation of mitigation measure Geology-2 would reduce significant impacts of Tier I related to the proposed project being located on a geologic unit or soil that is unstable to below the level of significance.

Implementation of mitigation measure Geology-3 would reduce significant impacts of Tier I related to the proposed project being located on expansive soil to below the level of significance.

Tier II

Implementation of mitigation measure Geology-1 would reduce significant impacts of Tier II related to soil erosion or loss of topsoil to below the level of significance.

[47] California Stormwater Quality Association. 2003. *California Stormwater Best Management Practice Handbooks: Construction*. Menlo Park, CA. Available at: http://www.cabmphandbooks.com/Documents/Construction/Section_3.pdf

Implementation of mitigation measure Geology-2 would reduce significant impacts of Tier II related to the proposed project being located on a geologic unit or soil that is unstable to below the level of significance.

Implementation of mitigation measure Geology-3 would reduce significant impacts of Tier II related to the proposed project being located on expansive soil to below the level of significance.

3.5 GREENHOUSE GAS EMISSIONS

As a result of the Initial Study,[1] the County of Los Angeles (County) determined that the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in significant impacts to greenhouse gas (GHG) emissions. Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts from GHG emissions.

The analysis of GHG emissions consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential for impacts to GHG emissions has been analyzed in accordance with Appendix G of the State California Environmental Quality Act (CEQA) Guidelines[2] and the Air Quality Technical Impact Report prepared for the proposed project (Appendix C, *Air Quality and Greenhouse Gas Emissions Technical Impact Report*).[3] Methodologies and modeling tools used to assess the proposed project's GHG emissions impacts reflect guidance provided by regulatory publications from the California Air Pollution Control Officers Association (CAPCOA),[4] the State of California Attorney General,[5] CARB;[6] and the Governor's Office of Planning and Research (OPR).[7]

The GHG emissions assessment considers all phases of project design, construction, and operation. The analysis of construction impacts was based on the construction scenario, as described in Section 2.0, *Project Description*, of this EIR, as well as on a construction scenario for a project of comparable size and a construction schedule of comparable duration.

Greenhouse Gases and Effects

The six GHGs regulated by the Kyoto Protocol and AB 32 include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulphur hexafluoride (SF_6), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs). These gases trap the energy from the sun and help maintain the temperature of the Earth's surface, creating a process known as the greenhouse effect. The sun emits solar radiation and provides energy to the Earth. Six percent of the solar radiation emitted by the sun is reflected back by the atmosphere surrounding the Earth, 20 percent of the solar radiation

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[1] Sapphos Environmental, Inc. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared for: County of Los Angeles. Pasadena, CA.

[2] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[3] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[4] California Air Pollution Control Office Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Sacramento, CA.

[5] California Department of Justice Office of the Attorney General. Updated 9 December 2008. *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*. Sacramento, CA.

[6] California Air Resources Board. 24 October 2008. *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act*. Available at: http://www.opr.ca.gov/ceqa/pdfs/Prelim_Draft_Staff_Proposal_10-24-08.pdf

[7] California Governor's Office of Planning and Research. 19 June 2008. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. Technical Advisory. Sacramento, CA.

is scattered and reflected by clouds, 19 percent of the solar radiation is absorbed by the atmosphere and clouds, 4 percent of the solar radiation is reflected back to the atmosphere by the Earth's surface, and 51 percent of the solar energy is absorbed by the Earth. GHGs such as CO_2 and CH_4 are naturally present in the atmosphere. The presence of these gases prevents outgoing infrared radiation from escaping the Earth's surface and lower atmosphere, allowing incoming solar radiation to be absorbed by living organisms on Earth. Without these GHGs, the earth would be too cold to be habitable; however, an excess of GHGs in the atmosphere can cause global climate change by raising the Earth's temperature, resulting in environmental consequences related to snowpack losses, flood hazards, sea-level rises, and fire hazards.

Global climate change results from a combination of three factors: 1) natural factors such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun; 2) natural processes within the Earth's climate system, such as changes in ocean circulation; and 3) anthropogenic activities, such as fossil fuel combustion, deforestation, reforestation, urbanization, and desertification, that change the composition of atmospheric gases. In its 2007 climate change synthesis report to policymakers, the Intergovernmental Panel on Climate Change (IPCC) concluded, "global GHG emissions due to human activities have grown since pre-industrial times, with an increase of 70 percent between 1970 and 2004."[8] Therefore, significant attention is being given to the anthropogenic causes of the increased GHG emissions level. In the review of regulatory publications from CAPCOA,[9] CARB,[10] the California Attorney General,[11] and OPR,[12] there is a consensus on the closely associated relationship between fossil fuel combustion, in conjunction with other human activities, and GHG emissions. In California, GHG emissions are largely contributed by the transportation sector, which was responsible for 35 percent and 38 percent of statewide 1990 and 2004 GHG emissions, respectively; followed by the electricity generation sector, which was responsible for 25 percent of statewide emissions in both 1990 and 2004; the industrial sector, which was responsible for 24 percent and 20 percent of statewide 1990 and 2004 GHG emissions; and the commercial sector, which was responsible for 3 percent of statewide emissions in both 1990 and 2004.[13]

The characteristics and effects of three GHGs, including carbon dioxide, methane, and nitrous oxide, and a group of fluorinated GHGs, including SF_6, HFCs, and PFCs, are described to set the context for the analysis.

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[8] Intergovernmental Panel on Climate Change. Approved 12–17 November 2007. *Climate Change 2007: Synthesis Report, Summary for Policymakers*, p. 5. Valencia, Spain. Available at: http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr_spm.pdf

[9] California Air Pollution Control Officers Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Sacramento, CA.

[10] California Air Resources Board. 24 October 2008. *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act*. Available at: http://www.opr.ca.gov/ceqa/pdfs/Prelim_Draft_Staff_Proposal_10-24-08.pdf

[11] California Department of Justice, Office of the Attorney General. Updated 9 December 2008. *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*. Sacramento, CA.

[12] California Governor's Office of Planning and Research. 19 June 2008. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. Technical Advisory. Sacramento, CA.

[13] California Air Resources Board. 16 November 2007. *California 1990 Greenhouse Gas Emissions Level and 2020 Limit*. Sacramento, CA.

Carbon Dioxide (CO_2)

CO_2 is a colorless, odorless, and nonflammable gas that is the most abundant GHG in the Earth's atmosphere after water vapor. CO_2 enters the atmosphere through natural process such as respiration and forest fires, and through human activities such as the burning of fossil fuels (oils, natural gas, and coal) and solid waste, deforestation, and industrial processes. CO_2 absorbs terrestrial infrared radiation that would otherwise escape to space, and therefore plays an important role in warming the atmosphere. CO_2 has a long atmospheric lifetime of up to 200 years, and is therefore a more important GHG than water vapor, which has a residence time in the atmosphere of only a few days. CO_2 provides the reference point for the global warming potential (GWP) of other gases; thus, the GWP of CO_2 is equal to 1.

Methane (CH_4)

CH_4 is a principal component of natural gas and consists of a single carbon atom bonded to four hydrogen atoms. It is formed and released to the atmosphere by biological processes from livestock and other agricultural practices and by the decay of organic waste in anaerobic environments such as municipal solid waste landfills. CH_4 is also emitted during the production and transport of coal, natural gas, and oil. CH_4 is about 21 times more powerful at warming the atmosphere than CO_2 (a GWP of 21). Its chemical lifetime in the atmosphere is approximately 12 years. The relatively short atmospheric lifetime of CH_4, coupled with its potency as a GHG, makes it a candidate for mitigating global warming over the near-term. CH_4 can be removed from the atmosphere by a variety of processes such as the oxidation reaction with hydroxyl radicals (OH), microbial uptake in soils, and reaction with chlorine (Cl) atoms in the marine boundary layer.

Nitrous Oxide (N_2O)

N_2O is a clear and colorless gas with a slightly sweet odor. N_2O has a long atmospheric lifetime (approximately 120 years) and heat trapping effects about 310 times more powerful than carbon dioxide on a per molecule basis (a GWP of 310). N_2O is produced by both natural and human-related sources. The primary anthropogenic sources of N_2O are agricultural soil management such as soil cultivation practices, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, and production of adipic and nitric acids. The natural process of producing N_2O ranges from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests.

Fluorinated Gases

HFCs, PFCs, and SF_6 are synthetic, powerful GHGs that are emitted from a variety of industrial processes, including aluminum production, semiconductor manufacturing, electric power transmission, magnesium production and processing, and the production of HCFC-22. Fluorinated gases lifetimes vary. Fluorinated gases are being used as substitutes for ozone-depleting chlorofluorocarbons (CFCs). Fluorinated gases are typically emitted in small quantities; however, they have high global warming potentials of between 140 and 23,900.[14]

[14] California Climate Action Registry. January 2009. *California Climate Action Registry General Reporting Protocol, Version 3.1*. Los Angeles, CA.

3.5.1 Regulatory Framework

This regulatory framework identifies the federal, state, regional, and local laws that govern the regulation of GHG emissions and must be considered by the County when rendering decisions on projects that would have the potential to result in GHG emissions.

In October 2007, the CARB published a list of 44 early action measures to reduce GHG emissions in California.[15] This regulatory framework identifies State guidance on early GHG emissions reduction measures that warrants consideration by the County.

While the regulatory framework is discussed in detail below, it is important to note that the OPR has been tasked with developing CEQA guidelines with regard to GHG emissions. OPR has indicated that many significant questions must be answered before a consistent, effective, and workable process for completing climate change analyses can be created for use in CEQA documents. No federal or State agency (e.g. USEPA, CARB, or SCAQMD) responsible for managing air quality emissions has promulgated a global warming significance threshold that may be used in reviewing newly proposed projects. On a local level, the County has not adopted a climate change significance threshold. Neither the CEQA Statutes nor the CEQA Guidelines establish thresholds of significance or particular methodologies for performing an impact analysis. The determination of significance is left to the judgment and discretion of the lead agency.

Federal

Federal Clean Air Act

The federal CAA requires that federally supported activities must conform to the State Implementation Plan (SIP), whose purpose is that of attaining and maintaining the National Ambient Air Quality Standards (NAAQS). Section 176 (c) of the CAA as amended in 1990, established the criteria and procedures by which the Federal Highway Administration (United States Code, Title 23), the Federal Transit Administrations,[16] and metropolitan planning organizations (MPOs) determine the conformity of federally funded or approved highway and transit plans, programs, and projects to SIPs. The provisions of Code of Federal Regulations, Title 40, Parts 51 and 93,[17] apply in all non-attainment and maintenance areas for transportation-related criteria pollutants for which the area is designated non-attainment or has a maintenance plan.

The USEPA sets NAAQS. Primary standards are designed to protect public health, including sensitive individuals such as the children and the elderly, whereas secondary standards are designed to protect public welfare, such as visibility and crop or material damage. The CAA requires the USEPA to routinely review and update the NAAQS in accordance with the latest available scientific evidence. For example, the USEPA revoked the annual particulate matter (PM_{10}) standard in 2006 due to a lack of evidence linking health problems to long-term exposure to PM_{10}

[15] California Air Resources Board. October 2007. *Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration*. Available at: http://www.arb.ca.gov/cc/ccea/meetings/ea_final_report.pdf

[16] U.S. Environmental Protection Agency. 26 September 1996. "Approval and Promulgation of Implementation Plans and Redesignation of Puget Sound, Washington for Air Quality Planning Purposes: Ozone." In *Federal Register*, *61* (188). Available at: http://yosemite.epa.gov/r10/airpage.nsf/283d45bd5bb068e68825650f0064cdc2/e1f3db8b006eff1a88256dcf007885c6/$FILE/61%20FR%2050438%20Seattle%20Tacoma%20Ozone%20MP.pdf

[17] U.S. Environmental Protection Agency. 15 August 1997. "Transportation Conformity Rule Amendments: Flexibility and Streamlining." In *Federal Register, 62* (158). Available at: http://www.epa.gov/EPA-AIR/1997/August/Day-15/a20968.htm

emissions. The 1-hour standard for O_3 was revoked in 2005 in favor of a new 8-hour standard that is intended to be more protective of public health.

Areas designated as severe-17 for non-attainment of the federal 8-hour O_3 standard, such as the County, are required to reach attainment levels within 17 years after designation. Areas designated as "serious" for non-attainment of the federal PM_{10} air quality standard have a maximum of 10 years to reduce PM_{10} emissions to attainment levels. All non-attainment areas for $PM_{2.5}$ have 3 years after designation to meet the $PM_{2.5}$ standards. The SCAB has until 2021 to achieve the 8-hour O_3 standards and 2010 to achieve the $PM_{2.5}$ air quality standards.[18] Section 182(e)(5) of the federal CAA allows the USEPA administrator to approve provisions of an attainment strategy in an "extreme" area that anticipates development of new control techniques or improvement of existing control technologies if the State has submitted enforceable commitments to develop and adopt contingency measures to be implemented if the anticipated technologies do not achieve planned reductions.

Non-attainment areas that are classified as "serious" or "worse" are required to revise their air quality management plans to include specific emission reduction strategies in order to meet interim milestones in implementing emission controls and improving air quality. The USEPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the CAA. If a state fails to correct these planning deficiencies within two years of federal notification, the USEPA is required to develop a federal implementation plan for the identified non-attainment area or areas.

State

California Clean Air Act

The California CAA of 1988 requires all air-pollution control districts in the State to work to achieve and maintain State ambient air quality standards by the earliest practicable date and to develop plans and regulations specifying how they will meet this goal. On April 2, 2007, the Supreme Court ruled in *Massachusetts, et al. v. Environmental Protection Agency, et al.* (549 U.S. 1438; 127 S. Ct. 1438) that the CAA gives the USEPA the authority to regulate emissions of GHGs, including CO_2, CH_4, N_2O, and fluorinated gases, such as HFCs, PFCs, and SF_6,[19] thereby legitimizing GHGs as air pollutants under the CAA.

Executive Order S-3-05

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05. Recognizing that California is particularly vulnerable to the impacts of climate change, Executive Order S-3-05 establishes statewide climate change emission reduction targets to reduce $CO_{2equivalent}$ (CO_{2e}) to the 2000 level (473 million metric tons) by 2010, to the 1990 level (427 million metric tons of CO_{2e}) by 2020, and to 80 percent below the 1990 level (85 million metric tons of CO_{2e}) by 2050 (Table 3.5.1-1, *California Greenhouse Gas Business-as-Usual Emissions and Targets*).[20,21] The executive

[18] South Coast Air Quality Management District. June 2007. *2007 Air Quality Management Plan*. Diamond Bar, CA.

[19] U.S. Supreme Court. 2 April 2007. *Massachusetts, et al., v. Environmental Protection Agency, et al.* 549 U.S. 1438; 127 S. Ct. 1438. Washington, DC.

[20] California Governor. 2005. Executive Order S-3-05. Sacramento, CA.

[21] California Climate Action Team. 3 April 2006. *Climate Action Team Report to Governor Schwarzenegger and the California Legislature*. Sacramento, CA.

order directs the CAl/EPA Secretary to coordinate and oversee efforts from multiple agencies (i.e., Secretary of the Business, Transportation and Housing Agency; Secretary of the Department of Food and Agriculture; Secretary of the Resources Agency; Chairperson of the Air Resources Board; Chairperson of the Energy Commission; and President of the Public Utilities Commission), to reduce GHG emissions to achieve the target levels. In addition, the CAl/EPA Secretary is responsible for submitting biannual reports to the governor and state legislature that outline: (1) progress made toward reaching the emission targets, (2) impacts of global warming on California's resources, and (3) measures and adaptation plans to mitigate these impacts. To further ensure the accomplishment of the targets, the Secretary of CAl/EPA created a Climate Action Team made up of representatives from the agencies listed above to implement GHG emission reduction programs and report on the progress made toward meeting the statewide GHG targets established in this executive order. In 2006, the first report was released and identified that "the climate change emission reduction targets [could] be met without adversely affecting the California economy," and "when all [the] strategies are implemented, those underway and those needed to meet the Governor's targets, the economy will benefit."[22]

TABLE 3.5.1-1
CALIFORNIA GREENHOUSE GAS BUSINESS-AS-USUAL EMISSIONS AND TARGETS

California Greenhouse Gas Business-as-Usual Emissions and Targets (Million Metric Tons of $CO_{2Equivalent}$)					
Year	**1990**	**2000**	**2010**	**2020**	**2050**
Business-as-Usual Emissions[1]	427	473	532	596	762[2]
Target Emissions	—	—	473	427	85

NOTE:

1. The CARB has not yet projected 2050 emissions under a business-as-usual scenario; therefore, 2050 business-us-usual emissions were calculated assuming a linear increase of emissions from 1990 to 2050.

Assembly Bill 32: Global Warming Solutions Act of 2006

Signed by Governor Arnold Schwarzenegger in September 2006, Assembly Bill (AB) 32, Global Warming Solutions Act, requires a statewide commitment and effort to reduce GHG emissions to 1990 levels by 2020 (25 percent below business as usual).[23] This intended reduction in GHG emissions will be accomplished with an enforceable statewide cap on GHG emissions, which will be phased in 2012. To effectively implement the cap, AB 32 requires CARB to develop appropriate regulations and establish a mandatory reporting system to track and monitor GHG emissions levels from stationary sources.

This bill is the first statewide policy in the United States to mitigate GHG emissions and include penalties for non-compliance. Consistent with goals and targets set by other actions taking place at the regional and international levels, AB 32 sets precedence in inventorying and reducing GHG emissions. In passing AB 32, the State legislature has acknowledged that global warming and related effects of climate change are a significant environmental issue.

[22] California Climate Action Team. 12 January 2006. *Final Draft of Chapter 8 on Economic Assessment of the Draft Climate Action Team Report to the Governor and Legislature.* Sacramento, CA.

[23] California Air Resources Board. Assembly Bill 32 California Climate Solutions Act of 2006. Sacramento, CA. Available at: http://www.arb.ca.gov/cc/docs/ab32text.pdf

Executive Order S-20-06

On October 17, 2006, Governor Arnold Schwarzenegger signed Executive Order S-20-06, which calls for continued efforts and coordination among state agencies on the implementation of GHG emission reduction policies, AB 32, and Health and Safety Code (Division 25.5) through the design and development of a market-based compliance program.[24] In addition, Executive Order S-20-06 requires the development of GHG reporting and reduction protocols and a multi-state registry through joint efforts among CARB, CAl/EPA, and the California Climate Action Registry (CCAR). Executive Order S-20-06 directs the Secretary for Environmental Protection to coordinate with the Climate Action Team to develop a plan to create incentives for market-based mechanisms that have the potential of reducing GHG emissions.[25]

California Senate Bill 97

Approved by Governor Arnold Schwarzenegger on August 24, 2007, Senate Bill (SB) 97 is designed to work in conjunction with the State CEQA Guidelines and AB 32. Pursuant to the State CEQA Guidelines, the OPR is required to prepare for and develop proposed guidelines for implementation of CEQA by public agencies. Pursuant to AB 32, the CARB is required to monitor and regulate emission sources of GHGs that cause global warming in order to reduce GHG emissions. "SB 97 requires OPR, by July 1, 2009, to prepare, develop, and transmit to the [CARB] guidelines for the feasible mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions, as required by CEQA, including, but not limited to, effects associated with transportation or energy consumption."[26] On April 13, 2009, OPR submitted to the Secretary for Natural Resources its proposed amendments to the State CEQA Guidelines.[27] The amendments became effective on March 18, 2010. OPR and CARB are required to periodically update the guidelines to incorporate new information or criteria established by CARB pursuant to AB 32. Although SB 97 exempts transportation projects funded under the Highway Safety, Traffic Reduction, Air Quality and Port Security Bond Act of 2006, and projects funded under the Disaster Preparedness and Flood Prevention Bond Act of 2006, it would apply to any environmental documents, including an environmental impact report, a negative declaration, a mitigated negative declaration, or other documents required by CEQA that have not been certified or adopted by the CEQA lead agency by the date of the adoption of the regulations.

California Senate Bill 375

Approved by Governor Arnold Schwarzenegger in 2008, SB 375 directs CARB to set regional targets for reducing GHG emissions. SB 375 came about out of the recognition that the single largest source of GHGs in California is passenger vehicles emissions, and that in order to reduce those emissions, vehicle-miles traveled (VMTs) must be reduced. SB 375 requires metropolitan planning organizations (MPOs) to include "sustainable communities strategies" in their regional transportation plans (RTPs) for the purpose of complying with the goal of AB 32 to reduce GHG emissions down to 1990 levels by 2020.[28] SB 375 offers CEQA streamlining incentives to

[24] California Governor. 2006. Executive Order S-20-06. Sacramento, CA.

[25] California Governor. 2006. Executive Order S-20-06. Sacramento, CA.

[26] California Governor's Office of Planning and Research. 24 August 2007. Senate Bill No. 97, Chapter 185. Available at: http://www.opr.ca.gov/ceqa/pdfs/SB_97_bill_20070824_chaptered.pdf

[27] The Governor's Office of Planning and Research. April, 2009. *CEQA Guidelines Sections Proposed to be Added or Amended*. Available at: http://www.opr.ca.gov/ceqa/pdfs/PA_CEQA_Guidelines.pdf

[28] California Government Web site: http://gov.ca.gov/fact-sheet/10707/. October 1 2008. Viewed on August 19, 2010.

encourage projects that are consistent with a regional plan that achieves GHG emission reductions; and coordinates the regional housing needs allocation process with the regional transportation process while maintaining local authority over land use decisions.

State of California Office of the Attorney General Guidance Letter on California Environmental Quality Act, Addressing Global Warming Impacts at the Local Agency Level

In 2008, the California Office of the Attorney General provided guidance to public agencies on how to address global warming impacts in CEQA documents. In the publication entitled *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*, the Office of Attorney General directs public agencies to take a leadership role in integrating sustainability into public projects by providing 52 project-level mitigation measures for consideration in the development of projects.[29] In addition, the Office of Attorney General has negotiated four (4) settlement agreements under CEQA, all of which require the project proponents to consider sustainable design for projects and feasible mitigation measures and alternatives to substantially lessen global warming related effects.

State of California Office of Planning and Research Technical Advisory

On June 19, 2008, OPR provided guidance on how to address climate change in CEQA documents. In the technical advisory, *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, OPR issues technical guidance on how to perform GHG analyses in the interim before further state guidelines become available.[30]

California Climate Action Registry

Established in 2001, the CCAR is a private nonprofit organization originally formed by the State of California. The CCAR serves as a voluntary GHG registry and has taken a leadership role on climate change by developing credible, accurate, and consistent GHG reporting standards and tools for businesses, government agencies, and nonprofit organizations to measure, monitor, and reduce GHG emissions. For instance, the CCAR General Reporting Protocol, version 3.1, dated January 2009, provides the principles, approach, methodology, and procedures required for voluntary GHG emissions reporting by businesses, government agencies, and nonprofit organizations. In 2007, the County became a member of the CCAR and has committed its efforts to monitor, report, and reduce GHG emissions pursuant to its participation in the CCAR.

Regional

South Coast Air Quality Management District

On September 5, 2008, the SCAQMD Governing Board approved the SCAQMD Climate Change Policy, which directs SCAQMD to assist the state, cities, local governments, businesses, and residents in areas related to reducing emissions that contribute to global warming.[31]

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[29] California Department of Justice Office of the Attorney General. Updated 9 December 2008. *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*. Sacramento, CA.

[30] California Governor's Office of Planning and Research. 19 June 2008. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. Technical Advisory. Sacramento, CA.

[31] South Coast Air Quality Management District. 5 September 2008. *SCAQMD Climate Change Policy*. Available at: http://www.aqmd.gov/hb/2008/September/080940a.htm

Pursuant to the policy, the SCAQMD will:

a. Establish Climate Change Programs

b. Implement SCAQMD Command-and-Control and Market-Based Rules

c. Review and comment on future legislation related to climate change and GHGs

d. Prioritize projects that reduce both criteria and toxic pollutants and GHG emissions

e. Provide guidance on analyzing GHG emissions and identify mitigation measures to CEQA projects

f. Provide revisions to *SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*[32] that is consistent with the state guidance, to include information on GHG strategies as a resource for local governments

g. Update the SCAQMD's GHG inventory in conjunction with each Air Quality Management Plan and assist local governments in developing GHG inventories

h. Reduce SCAQMD climate change impacts

i. Inform the public on various aspects of climate change, including understanding impacts, technology advancement, public education, and other emerging aspects of climate change science. Therefore, the goals of the SCAQMD Climate Change Policy are to decrease SCAQMD's carbon footprint, assist businesses and local governments with implementation of climate change measures, and provide information regarding climate change to the public

Southern California Association of Governments

The proposed project site is located within the Southern California Association of Governments (SCAG) area, a six-County MPO including Los Angeles and surrounding Counties. Several planning-related efforts and responsibilities at the MPO level, while established for various purposes, work toward achieving the goals of state GHG legislation (AB 32 and SB 375). Under SB 375, the 18 MPOs in California must prepare a "sustainable communities strategy" to reduce the amount of VMT in their respective regions and demonstrate the ability for the region to attain ARB's targets.[33] In addition to SCAG's RHNA, RTP, and RCP, the Compass Growth Vision Report[34] (Compass Growth Vision), published in June 2004, presents a comprehensive growth vision for the SCAG region, which establishes the Compass Blueprint 2% Strategy. The 2% Strategy calls for modest changes to current land use and transportation trends on only two percent of the land area

[32] South Coast Air Quality Management District. 6 May 2005. *Guidance Document for Addressing Air QualityIssues in General Plans and Local Planning.* Diamond Bar, CA.

[33] California Government. Web site. Available at: http://gov.ca.gov/fact-sheet/10707/. October 1 2010. Accessed August 19, 2010.

[34] Southern California Association of Governments. Accessed 29 June 2010. *Compass Growth Vision Report*. Available at: http://www.compassblueprint.org/files/scag-growthvision2004.pdf

of the region, known as the 2% Strategy Opportunity Areas,[35] focusing future growth in urban centers and existing cities to reduce vehicle miles traveled and preserve rural and other natural areas.[36] The 2% Strategy Opportunity Areas are key areas of the SCAG region for targeting growth, and are primarily comprised of metro center, city centers, rail transit stops, bus rapid transit corridors, airports, ports and industrial center, priority residential in-fill area and Compass Blueprint priority communities.[37] The Martin Luther King Jr. Medical Center, including the proposed project's Tier I and Tier II components, is within the 2% Strategy Opportunities Area (City of Los Angeles South Map).

County of Los Angeles General Plan

The proposed project site is located within and owned by the County; therefore, development in the area is governed by the policies, procedures, and standards set forth in the County General Plan. The proposed project is considered as a capital facility for the County; therefore, pursuant to the OPR's guidelines for a general plan related to capital facilities, the proposed project must be consistent with the County General Plan.[38] In addition, the County is required to review the capital improvement programs to ensure their consistency with the General Plan.[39] The proposed project would be expected to be consistent with the objectives of the Air Quality element of the County General Plan, which includes objectives related to GHG emissions, and would not be expected to result in a change to the population growth assumption used by the SCAG for attainment planning. The County General Plan has developed goals and policies for improving air quality in the County. Many policies are transportation-based because of the direct link between air quality and the Circulation element. The objectives and policies relevant to the proposed project and capable of contributing toward avoiding and reducing the generation of air quality emissions, which also would have the potential to avoid and reduce the generation of GHG emissions, include the following:[40]

- **Objective:** To support local efforts to improve air quality.
- **Policy:** Actively support strict air quality regulations for mobile and stationary sources, and continued research to improve air quality. Promote vanpooling, carpooling, and improved public transportation.

- **Objective:** To conserve energy resources and develop alternative energy sources.
- **Policy:** Support the conservation of energy and encourage the development and utilization of new energy sources including geothermal, thermal waste, solar, wind, and ocean-related sources.

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[35] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, 2% Strategy." Available at: http://www.compassblueprint.org/about/strategy

[36] Southern California Association of Governments. Accessed 19 August 2010. "Compass Growth Vision." Web site. Available at: http://www.compassblueprint.org/about/principles

[37] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, Opportunities Areas Maps." Available at: http://www.compassblueprint.org/opportunityareas

[38] California Governor's Office of Planning and Research. October 2003. *General Plan Guidelines*. Available at: http://www.opr.ca.gov/planning/publications/General_Plan_Guidelines_2003.pdf

[39] California Governor's Office of Planning and Research. October 2003. *General Plan Guidelines*. Available at: http://www.opr.ca.gov/planning/publications/General_Plan_Guidelines_2003.pdf

[40] County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

The proposed project would be consistent with the above policies and objectives.

County of Los Angeles Energy and Environmental Policy

The County Board of Supervisors adopted a Countywide energy and environmental policy (Policy No. 3.045), which became effective on December 19, 2006.[41] The goal of this policy is to provide guidelines for development, implementation, and enhancement of energy conservation and environmental programs within the County. The policy established an Energy and Environmental Team to coordinate the efforts of various County departments, established a program to integrate sustainable technologies into its Capital Project Program, established an energy consumption reduction goal of 20 percent by the year 2015 in County facilities, and became a member of the California Climate Action Registry (CCAR) to assist the County in establishing goals for reducing GHG emissions. In addition, the policy included four program areas to promote green design and operation of County facilities and reduce the County's environmental footprint. Goals and initiatives for each program area are included as follows:

<u>Energy and Water Efficiency</u>

- Implementing and monitoring energy and water conservation practices
- Implementing energy and water efficiency projects
- Enhancing employee energy and water conservation awareness through education and promotions

<u>Environmental Stewardship</u>

- Investigating requirements and preferences for environmentally friendly packaging, greater emphasis on recycled products, and minimum energy efficiency standards for appliances
- Placing an emphasis on recycling and landfill volume reduction within County buildings
- Investigating the use of environmentally friendly products
- Supporting environmental initiatives through the investigation of existing resource utilization

<u>Public Outreach and Education</u>

- Implementing a program that provides County residents with energy-related information, including energy and water conservation practices, utility rates and rate changes, rotating power outage information, emergency power outage information, and energy efficiency incentives

[41] County of Los Angeles Board of Supervisors Policy Manual. 19 December 2006. *Policy No. 3.045, Energy and Environmental Policy*. Available at: http://countypolicy.co.la.ca.us/

- Seeking collaboration with local governments, public agencies, and County affiliates to strengthen regional, centralized energy and environmental management resources and identify and develop opportunities for information and cost sharing in energy management and environmental activities

Sustainable Design

- Enhancing building sustainability through the integration of green, sustainable principles into the planning, design, and construction of County capital projects, which complement the functional objectives of the project, extend the life cycle / useful life of buildings and sites, optimize energy and water use efficiency, improve indoor environmental quality and provide healthy work environments, reduce ongoing building maintenance requirements, and encourage use and reuse of environmentally friendly materials and resources

- Establishing a management approach that instills and reinforces the integration of sustainable design principles into the core competency skill set of the County's planner, architects, engineers, and project managers

- Establishing practical performance measures to determine the level of sustainability achieved relative to the objectives targeted for the individual project and overall capital program

Business-as-usual Emissions and Targets

In order to establish a reference point for future GHG emissions, CO_{2e} emissions have been projected based on an unregulated, business-as-usual, GHG emissions scenario that does not take into account the reductions in GHG emissions required by Executive Order S-3-05 or AB 32. CARB has stated that California contributed 427 million metric tons of GHG emission in CO_{2e} in 1990, and under a business-as-usual development scenario, will contribute approximately 596 million metric tons of CO_{2e} emissions in 2020, presenting a linear upward trend in California's total GHG emissions levels. To characterize the GHG emissions business-as-usual conditions for the County, information on County population has been collected from SCAG. It has been projected that the County would increase its population from approximately 10.6 million in 2010 to approximately 12.0 million in 2030.[42] Using the current CO_{2e} emissions factor of 14 metric tons per capita,[43] the County would be expected to be responsible for approximately 149 million metric tons of CO_{2e} emissions in 2010 under a business-as-usual emissions scenario and 168 million metric tons of CO_{2e} emissions in 2030. Each year, more GHGs would be expected to be emitted by the County than the previous year due to the increase in population (Table 3.5.1-2, *Characterization of Business-as-Usual and Target GHG Emissions for the County*). Using the target emissions necessary for compliance with AB 32 reduction goals,[44] the County would be responsible for approximately 141 million metric tons of CO_{2e} emissions in 2010 and 70 million metric tons of CO_{2e} emissions in 2030 (Table 3.5.1-2). Therefore, the County is responsible for reducing GHG emissions from

[42] Southern California Association of Governments. 2 June 2008. E-mail to William Meade, Sapphos Environmental, Inc. Pasadena, CA.

[43] California Air Resources Board. December 2008. *Climate Change Scoping Plan: A Framework for Change*. Available at: http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm

[44] California Air Resources Board. December 2008. *Climate Change Scoping Plan: A Framework for Change*, p. 118 Available at: http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm

business-as-usual by 8 million metric tons per year in 2010 and 98 million metric tons per year in 2030. The 2014 and 2020 data from Table 3.5.1-2 was used for the GHG analysis for the proposed project, because construction of Tier I is anticipated to be completed by 2014 and construction of Tier II is anticipated to be completed by 2020.

TABLE 3.5.1-2
CHARACTERIZATION OF BUSINESS-AS-USUAL AND TARGET GHG EMISSIONS FOR THE COUNTY

	Year					
	2010	**2014**	**2015**	**2020**	**2025**	**2030**
Population	10,615,700	10,900,885	10,971,589	11,329,802	11,678,528	12,015,892
CARB business-as-usual emission factor (metric tons of CO_{2e}/SP)	14	14	14	14	14	14
Total business-as-usual County GHG emissions (million metric tons of CO_{2e})	**149**	**153**	**154**	**159**	**163**	**168**
CARB target emission factors (metric tons of CO_{2e}/SP)	13.3	11.8	11.4	9.6	7.7	5.8
Total target County GHG emissions (million metric tons of CO_{2e})	**141**	**129**	**126**	**108**	**90**	**70**

SOURCES:

1. Southern California Association of Governments. 2 June 2008. E-mail to William Meade, Sapphos Environmental, Inc. Pasadena, CA.
2. California Air Resources Board. 2008. *Summary of Population, Employment, and GHG Emissions Projections Data*. Sacramento, CA.

The proposed project is not an industrial project and would not include major increases in stationary sources or significant refrigeration. Therefore, VMT and electricity consumption are the two major sources of GHG emissions for the proposed project. The other source of GHG emissions for the proposed project is area sources, such as gas appliances, wood stoves, fireplaces, and landscape maintenance equipment. In the absence of established guidelines for evaluating GHGs under CEQA, the County has decided to evaluate the efficacy of the proposed project to meet standards for CO_{2e} reduction by evaluating the forecasted electricity use of the proposed project and the number of anticipated vehicle miles travelled in both a qualitative and quantitative manner, as well as quantifying area sources.

3.5.2 Existing Conditions

The approximately 38-acre proposed project area currently contains buildings, structures, and other built features. GHG emissions are generated daily from the hospital facilities by landscape maintenance equipment, campus operations including but not limited to space and water heating, and vehicle trips to and from the proposed project site. The average daily emissions generated by the existing uses at the proposed project sight were estimated using URBEMIS 2007 and the CCAR General Reporting Protocol (Table 3.5.2-1, *Estimated Existing Daily Operational Emissions*),[45] assuming that there is currently 1.2 million square feet of potentially operational hospital space at the proposed project site. The current operational emissions of GHGs are estimated to be a maximum of over 180,000 pounds per day of CO_{2e}, which is equivalent to approximately 25,000 metric tons per year, which is mainly a result of the large number of vehicle trips (17,443 in total) generated by the hospital campus. These emission estimates are an overestimate due to the fact that the current campus is not fully utilized. For example, the Multi-service Ambulatory Care Center (MACC) and the Interns and Physicians Building are not fully operational. However, the calculated emissions provide an estimate of the worst-case scenario, should the current buildings become fully operational prior to completion of the proposed project.

TABLE 3.5.2-1
ESTIMATED EXISTING DAILY OPERATIONAL EMISSIONS

Emission Sources	CO_2 Emissions		
	Pounds/ Per Day	Metric Tons/ Per Year	Metric Tons/ Per Capita/ Per Year
Mobile Sources	143,940	23,831	0.0022
Area Sources	9,949	1,647	0.0002
Electricity Consumption	30,964	5,126	0.0005
Total Emissions	**184,853**	**25,478**	**0.0029**

NOTE:
1. Metric tons per capita were calculated using the 2010 population projection for the County.
2. Assuming full operational capacity.

3.5.3 Significance Thresholds

There are currently no established thresholds of significance for evaluating GHG emissions under CEQA in the County or the SCAQMD. As previously mentioned, no federal or State agency (e.g. USEPA, CARB, or SCAQMD) responsible for managing air quality emissions in the County has adopted a GHG emission significance threshold that may be used in reviewing newly proposed projects.

Although not mandatory for the proposed project, the Bay Area Air Quality Management District (BAAQMD) is the only regional agency to have adopted operational GHG emission thresholds. On June 2, 2010, CEQA projects within the BAAQMD area must take the following significance thresholds into consideration:

[45] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

Stationary sources:

- 10,000 metric tons CO_{2e}/year

Projects other than stationary sources:

- Compliance with Qualified Greenhouse Gas Reduction Strategy; or
- 1,100 metric tons of CO_{2e}/year; or
- 4.6 metric tons CO_{2e} per year per capita service population (residents plus employees).

Plan-level emissions:

- Compliance with Qualified Greenhouse Gas Reduction Strategy; or
- 6.6 metric tons CO_{2e} per year per capita service population (residents plus employees).

CAPCOA has provided several approaches to consider potential cumulative significance of projects with respect to GHGs.[46] GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. A zero threshold approach can be considered based on the concept that climate change is a global phenomenon and all GHG emissions generated throughout the earth contribute to climate change. However, State CEQA Guidelines also recognizes that there may be a point where a project's contribution, although above zero, would not be a considerable contribution to the cumulative impact (CEQA Guidelines, Section 15130 (a)). Therefore, a threshold of greater than zero is considered more appropriate for the analysis of GHG emissions under CEQA. CAPCOA's summary of suggested thresholds for GHG emissions includes efficiency-based thresholds, quantitative emission limits, and limits on the size of projects (Table 3.5.3-1, *CAPCOA-Suggested Thresholds for Greenhouse Gases*).

TABLE 3.5.3-1
CAPCOA-SUGGESTED THRESHOLDS FOR GREENHOUSE GASES

	CAPCOA Suggested Threshold
Quantitative (900 metric tons)	~900 metric tons CO_{2e}/year for residential, office, and non-office commercial projects
Quantitative CARB Reporting Threshold/Cap and Trade	Report: 25,000 metric tons CO_{2e}/year Cap and Trade: 10,000 metric tons CO_{2e}/year
Quantitative Regulated Inventory Capture	~40,000 - 50,000 metric tons CO_{2e}/year
Unit-Based Threshold Based on Market Capture	Commercial space > 50,000 square feet
Projects of Statewide, Regional or Areawide Significance	Residential development > 500 units Shopping center/business establishment > 500,000 square feet Commercial office space > 250,000 square feet Industrial park > 600,000 square feet

SOURCE: California Air Pollution Control Office Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act.* Sacramento, CA.

[46] California Air Pollution Control Office Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act.* Sacramento, CA.

The proposed project was considered in relation to the CAPCOA's recommended quantitative threshold of ~900 metric tons per year, as that is the most conservative non-zero threshold suggested. Also, the CAPCOA threshold of ~900 metric tons per year can apply to non-office commercial projects, which is a category that is applicable to the proposed project. In addition, the County considered the significance of the proposed project in relation to the adopted BAAQMD threshold of 1,100 metric tons per year, which applies to projects other than stationary sources.

Based on Appendix G of the State CEQA Guidelines, the project would be expected to have the potential to result in significant impacts related to global climate change if the project does one of the following:

- Generates greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

- Conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

3.5.4 Impact Analysis

This section analyzes the potential for significant impacts due to GHG emissions that would occur from implementation of the proposed project. GHG emission impacts of a project generally fall into three major categories:

1. *Construction Impacts*: temporary impacts, including emissions from heavy equipment, delivery and dirt hauling trucks, and employee vehicles.

   Construction emissions vary substantially from day to day, depending on the level of construction phase and weather conditions.

2. *Operational Regional Impacts*: primarily emissions from natural gas and electricity usage and vehicles traveling to and from a project site.

3. *Cumulative Impacts*: GHG emission impacts resulting from the incremental impact of the project when added to other projects in the vicinity

Assessment Methods and Models

Methodology to assess the proposed project's impacts on global climate change has not been developed by SCAQMD, state, or federal agencies. No significance thresholds have been established to determine the project's construction and operational impacts on global climate change. Given the absence of methodology and thresholds to evaluate global climate change impacts of the proposed project and the challenges associated with determining criteria for the proposed project-specific significance in regards to GHG emissions, the proposed project's global climate change impacts were analyzed qualitatively according to its operational scenario, size, and location. In order to quantify the amount of GHG emissions contributed by construction and operation of the proposed project, the URBEMIS 2007 emissions model, the EMFAC 2007 model, and the CCAR General Reporting Protocol were used. Typically, the more energy used during operation of the proposed project, the more GHG emissions would be contributed by the proposed project. Therefore, the quantitative analysis on the proposed project's potential impacts to global

climate change also includes the analysis on energy consumption that would be required during its operational phase. Due to the absence of adopted significance criteria and thresholds for GHG emissions by SCAQMD or a state or federal agency with jurisdiction over the County, the level of significance of the proposed project's potential impacts to global climate change would be determined by comparing the GHG emissions per capita to the GHG emissions per capita required to reduce California's GHG emissions to 1990 levels (10 metric tons per capita) by 2020 as required by AB 32, as well as the suggested thresholds by CAPCOA and the adopted thresholds by the BAAQMD.

URBEMIS Model

The methodology used to analyze construction and operational GHG emission impacts is consistent with the methods described in the 1993 *CEQA Air Quality Handbook*.[47] The CARB URBEMIS 2007, version 9.2.4, was used to estimate construction emissions from the demolition of 506,485 square feet of buildings, the construction of 156,700 square feet of new buildings in Tier I, and the construction of up to approximately 1,814,696 square feet of new buildings in Tier II. The analysis of construction impacts to GHG emissions is based on the construction scenario described as an element of Section 2.0, *Project Description*, of this EIR and includes demolition and building construction impacts.

URBEMIS is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, and office buildings; area sources such as gas appliances, wood stoves, fireplaces, and landscape maintenance equipment; and construction projects. The URBEMIS 2007 model directly calculates CO_2 emissions. However, the URBEMIS 2007 model does not calculate CH_4 and N_2O emissions; therefore, the GHG emissions calculated by URBEMIS are reported as CO_2 emissions, not CO_{2e} emissions. CO_2 emissions reported from URBEMIS in this EIR are essentially the same as CO_{2e} emissions because CH_4 and N_2O emissions from mobile sources are negligible in comparison to CO_2 emissions. URBEMIS 2007, version 9.2.4, was also used to analyze the proposed project's operational emissions, which would likely result from the vehicle trips to and from the proposed project site, and area source emissions, which would likely result from natural gas combustion and landscaping activities within the vicinity of the proposed project site.

EMFAC 2007 Model

[47] South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

The CARB Emissions Factors (EMFAC) 2007 model, version 2.3, was used to evaluate the proposed project's GHG emission level contributed by mobile sources, such passenger cars, based on the expected vehicle fleet mix, vehicle speeds, commute distances, and temperature conditions for the estimated start date of the proposed project. The EMFAC 2007, version 2.3, which is embedded within the URBEMIS 2007 model, includes emission factors for CO_2. The transportation-related GHG emissions impacts generated by implementation of the proposed project were analyzed using the EMFAC 2007 model. The EMFAC 2007 model within URBEMIS 2007 does not calculate CH_4 and N_2O emissions for mobile sources, and therefore the GHG emissions of mobile sources calculated by EMFAC are reported as CO_2 emissions, not CO_{2e} emissions. In this analysis, fleet mix, vehicle speeds, commute distances, and temperature conditions were based on the default values in the URBEMIS 2007 and EMFAC 2007 models.[48]

CCAR General Reporting Protocol

Another method used to estimate the GHG emissions of the proposed project was CCAR's General Reporting Protocol, Version 3.1. The CCAR General Reporting Protocol outlines the GHG emissions reporting rules, emission calculation methodologies, and standardized recommended reporting mechanism. The CCAR General Reporting Protocol provides information on emission factors for CO_2, CH_4, N_2O, and CFCs and methodologies on how to calculate GHG emissions from annual electricity and natural gas consumption.

The methodology to quantify electricity consumption at the proposed project using the CCAR General Reporting Protocol consists of quantification of the annual electricity use required by the proposed project facilities.

Qualitative Analysis on Proposed Project's Impacts on Global Climate Change

Construction Activities

The proposed project's incremental impact on GHG emission would be significant if the size, the nature, or the duration of the construction phase would generate a substantial amount of GHG emissions.

Tier I. Tier I project construction is anticipated to take up to 37 months with build-out anticipated in 2014. During construction, standard heavy-duty construction equipment would be operated. The relatively small size of the area under construction (approximately 5 acres) and the relatively short duration of construction activities (up to 37 months) would not be expected to result in substantial emissions of GHGs. Therefore, GHG emission impacts due to Tier I of the proposed project's construction phase would be expected to be below the level of significance. In addition, it is anticipated that mitigation measures recommended in the Air Quality Subsection 3.2.5, Mitigation Measures, of this EIR for reducing PM_{10} emissions and NO_x emissions and compliance with Leadership in Energy and Environmental Design (LEED) criteria would reduce the proposed project's GHG emission impacts during construction.

Tier II. Tier II is anticipated to be completed within a 10-year period from 2010 to 2020. The construction phase of Tier II of the proposed project would cover an area of approximately 38 acres in size. During construction, standard heavy-duty construction equipment would be

[48] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

operated. The relatively large area under construction and long duration of construction activities would be expected to result in substantial GHG emissions. Therefore, GHG emissions due to Tier II of the proposed project's construction phase would result in significant impacts.

Operation and Maintenance

Tier I. Tier I of the proposed project's operational phase would not be expected to result in substantial increases in GHG emissions. Due to the fact that Tier I would incorporate green building design principles and would result in a decrease in square footage compared to existing conditions, the electricity consumption and mobile source emissions during operation of Tier I would be expected to be below the level of significance. Energy efficiency, reduction in materials and resources, and attainment of the indoor environmental quality would be integrated into the design features of Tier I to reduce or prevent GHG emissions associated with the proposed project's operation. Attainment of LEED credits and the utilization of energy-efficient equipment would be expected to be consistent with the County Energy and Environmental Policy, particularly with the Energy and Water Efficiency Program, the Environmental Stewardship Program, and the Sustainable Design Program set forth in the policy. Therefore, there would be no anticipated significant GHG emission impacts due to operation of Tier I of the proposed project.

Tier II. Incorporation of green building design principles, attainment of LEED credits and the utilization of energy-efficient equipment would be expected to reduce the operational GHG impacts of Tier II to the maximum extent feasible. In addition, the chosen location for the proposed project in a SCAG 2% Strategy Opportunity Area, supports attainment of regional sustainable development patterns that are designed to reduce GHG emissions over business as usual. However, due to the large extent of the Tier II development of the proposed project, and the large number of daily vehicle trips (19,549) expected to occur during operation of the proposed project upon full build-out, the proposed project's operational phase would be expected to result in significant and unavoidable impacts related to GHG emissions.

Quantitative Analysis on Proposed Project's Impacts on Global Climate Change

Construction Activities

The analysis of construction-related GHG emissions was based on the construction scenario described in Section 2.0, *Project Description*, of this EIR. GHG emissions during the construction phase can be attributed to emissions from demolition, excavation and construction equipment and mobile emissions from worker and vendor trips.

Tier I. Based on the methods and modeling tools previously described, Tier I construction activities would result in up to a maximum of 12,740 pounds per day of CO_2 emissions, or approximately 3,840 metric tons for the total 37-month duration of the Tier I construction phase, which is equivalent to approximately 0.0004 metric tons per capita (Table 3.5.4.1-1, *Tier I: Unmitigated Estimated Daily Regional Construction Emissions*).[49] The annual emissions due to construction of Tier I of the proposed project, which would be approximately 1,408 metric tons per year during the highest emitting year, would be expected to be below the level of significance when compared to California's GHG emissions target for 2020, 427 million metric tons per year, and the County's GHG emissions target for 2020, 108 million metric tons per year (approximately 9.6 metric tons

[49] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

per capita). In addition, when compared with the suggested thresholds for GHG emissions provided by CAPCOA (Table 3.5.3-1), construction of Tier I of the proposed project would not exceed the suggested cap and trade threshold of 10,000 metric tons CO_{2e} per year. However, construction of Tier I may be considered to be above the level of significance upon application of CAPCOA's suggested quantitative threshold of 900 metric tons of CO_{2e} per year or the BAAQMD's adopted quantitative threshold of 1,100 metric tons per year. On this basis, specific to this proposed project only, and because the County is attempting to evaluate the impacts of the proposed project from a conservative worst-case scenario, it can be conservatively determined that the GHG emission impacts due to construction of Tier I of the proposed project may be above the level of significance.

TABLE 3.5.4.1-1
TIER I: UNMITIGATED ESTIMATED DAILY REGIONAL CONSTRUCTION EMISSIONS

Construction Phase	CO_2 Emissions (Pounds/ Day)	Duration of Construction Phase (days)	CO_2 Emissions (Metric tons)	CO_2 Emissions (Metric tons per capita)
Demolition	1,915	22	19	0.0000
Mass Site Grading	9,743	23	25	0.0000
Trenching	3,150	64	91	0.0000
Building Construction[1]	11,890	609	3,284	0.0003
Paving	1,565	43	31	0.0000
Architectural Coating	107	44	2	0.0000
90 worker trips	850	805	310	0.0000
Maximum Total	**12,740**	**805**	**3,840**	**0.0004**

NOTE: Metric tons per capita were calculated using the 2014 population projection for the County.

Tier II. Tier II construction activities would result in up to a maximum of 37,088 pounds per day of CO_2 emissions, or approximately 37,804 metric tons for the total 10-year duration of the Tier II construction phase, which is equivalent to approximately 0.0033 metric tons per capita (Table 3.5.4.1-2, *Tier II: Unmitigated Estimated Daily Regional Construction Emissions*).[50] The annual emissions during construction of Tier II would be a maximum of 4,206 metric tons per year, or 0.0004 metric tons per capita per year. The annual emissions due to construction of Tier II of the proposed project would be expected to be below the level of significance when compared to California's GHG emissions target for 2020, 427 million metric tons per year, and the County's GHG emissions target for 2020, 108 million metric tons per year (approximately 9.6 metric tons per capita). In addition, when compared with the suggested thresholds for GHG emissions provided by CAPCOA (Table 3.5.4-1), construction of Tier II of the proposed project would not exceed the suggested cap and trade threshold of 10,000 metric tons CO_{2e} per year. However, construction of the Tier II may be considered to be above the level of significance upon application of CAPCOA's suggested quantitative threshold of 900 metric tons of CO_{2e} per year or the BAAQMD's adopted quantitative threshold of 1,100 metric tons per year. On this basis, specific to this proposed project only, and because the County is attempting to evaluate the impacts of the proposed project from a conservative worst-case scenario, it can be conservatively determined that the GHG emission impacts due to construction of Tier II of the proposed project may be above the level of significance.

[50] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

TABLE 3.5.4.1-2
TIER II: UNMITIGATED ESTIMATED DAILY REGIONAL CONSTRUCTION EMISSIONS

Year	CO_2 Emissions (Pounds/Day)	Duration of Construction Phase (days)	CO_2 Emissions (Metric tons)[3]	CO_2 Emissions (Metric tons per capita)[1]
2010	9,743	45	199	0.0000
2011	21,968	260	2,591	0.0002
2012	33,857	260	3,993	0.0004
2013	35,668	260	4,206	0.0004
2014	35,668	260	4,206	0.0004
2015	35,668	260	4,206	0.0004
2016	35,667	260	4,206	0.0004
2017	35,667	260	4,206	0.0004
2018	35,667	260	4,206	0.0004
2019	23,778	260	2,804	0.0002
2020	11,889	239	1,289	0.0001
150 worker trips	1,420	2,624	1,690	0.0001
Maximum Total	**37,088[2]**	**2,624**	**37,804[4]**	**0.0033[4]**

NOTES:
1. Metric tons per capita were calculated using the 2020 population projection for the County.
2. Maximum daily emissions are equal to the highest daily construction emissions plus emissions due to 150 worker trips (35,668 + 1,420)
3. Metric tons per year, apart from worker trips, which are reported as total emissions for the entire 10 year construction duration.
4. Total emissions were calculated by summing the total annual emissions for each year of construction and the total emissions due to worker trips for the entire 10 year construction duration.

Operation and Maintenance

Over 50 percent of the electricity generated in California is derived from fossil fuels, such as natural gas and coal.[51] The combustion of fossil fuels for electricity production results in emissions of GHGs. Therefore, an analysis of projected electricity consumption of the proposed project is required in order to quantify the potential amount of GHGs emitted by the proposed project.

Two GHG emissions estimation tools, the URBEMIS 2007 model and the CCAR General Reporting Protocol, were used in evaluating the proposed project's potential GHG emission levels due to operation and maintenance. The URBEMIS 2007 model was used to estimate CO_2 emissions from on-road vehicle trips, and the CCAR General Reporting Protocol was used to estimate the CO_{2e} emissions from electricity use (Table 3.5.4.1-3, *Estimated Daily Increase in Operational Emissions Due to the Proposed Project)*.

[51] U.S. Environmental Protection Agency. Accessed 21 May 2009. "How Clean is the Electricity I Use – Power Profiler." Available at: http://www.epa.gov/cleanenergy/energy-and-you/how-clean.html

TABLE 3.5.4.1-3
ESTIMATED DAILY INCREASE IN OPERATIONAL EMISSIONS DUE TO THE PROPOSED PROJECT

Emission Sources	CO_2 Emissions		
	Pounds/Day	Metric Tons/Year	Metric Tons/Per Capita/Per Year
Tier I Mobile Source Emissions	-40,594	-6,721	-0.0006
Tier II Mobile Source Emissions	204,009	33,776	0.0030
Net Mobile Source Emissions	**163,415**	**27,055**	**0.0024**
Tier I Electricity Consumption	-8,739	-1,447	-0.0001
Tier II Electricity Consumption	46,825	7,752	0.0007
Net Electricity Consumption	**38,085**	**6,305**	**0.0006**
Total Area Sources	**11,811**	**1,955**	**0.0002**
TOTAL EMISSIONS	**213,311**	**35,315**	**0.0032**

NOTE:
1. Metric tons per capita for Tier I and Tier II were calculated using the 2014 and 2020 population projections for the County, respectively.
2. Negative numbers indicate a decrease in emissions in comparison with existing conditions.

Tier I. Due to the fact that Tier I would reduce the existing square footage of available building space on site, Tier I would result in a decrease in emissions due to electricity consumption and mobile sources compared to existing conditions (Table 3.5.4.1-3*)*. Based on a build-out year of 2014, results from the URBEMIS 2007 model suggest that CO_2 emissions associated with on-road vehicle use would be reduced by a maximum of approximately 40,594 pounds per day or 6,721 metric tons per year in comparison with existing conditions (Table 3.5.2-1*)*.[52] Results from the CCAR General Reporting Protocol calculations suggest that CO_{2e} emissions associated with electricity consumption would be reduced by a maximum of approximately 8,739 pounds per day or 1,447 metric tons per year in comparison with existing conditions (Table 3.5.4.1-3*)*.[53] The net CO_{2e} emissions associated with the Martin Luther King, Jr. Medical Center Campus (existing conditions minus the emission reductions caused by implementation of Tier I) would be 17,110 metric tons per year due to mobile sources and 3,679 due to electricity use, which is a reduction from the existing conditions (Table 3.5.2-1*)*. Therefore, there would be no expected GHG emission impacts associated with operation of Tier I.

Tier II. Based on a build-out year of 2020, results from the URBEMIS 2007 model suggest that CO_2 emissions associated with on-road vehicle use would be a maximum of approximately 204,009 pounds per day or 33,776 metric tons per year upon completion of Tier II (Table 3.5.4.1-3*)*.[54] Tier II would also result in approximately 46,825 pounds per day or 7,752 metric tons of CO_{2e} emissions per year as a result of electricity consumption (Table 3.5.4.1-3). Using the projected

[52] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[53] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[54] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

2020 population for the County, Tier II of the proposed project would be expected to contribute up to 0.004 metric tons of CO_2 per capita per year (Table 3.5.4.1-3).[55]

The calculations presented do not account for the energy efficiency measures that would be incorporated into the proposed project design. For example, development of the new MACC and the Ancillary Building are currently registered with the U.S. Green Building Council under Leadership in Energy and Environmental Design for New Construction (LEED-NC).[56] The County will seek LEED Silver certification for the new MACC and the Ancillary Building.[57] The LEED program recognizes and promotes a project's success in five areas: (1) sustainable sites, (2) water efficiency, (3) energy and atmosphere efficiencies, (4) materials and resources, and (5) indoor environmental quality. In addition, the federal government has a program titled "Green Guide for Healthcare Construction" (GGHC), which is designed to help hospitals navigate through the LEED program. The proposed project would incorporate energy efficient and sustainable strategies throughout the construction, development, and operation of the proposed project. LEED requires that new construction or renovation projects achieve at least two Optimize Energy Performance points. The projects can achieve two points in this credit either by following a prescriptive compliance path or by demonstrating a percentage improvement in the proposed building performance rating compared to the baseline building performance rating of 14 percent or higher for new buildings or 7 percent or higher for existing building renovations;[58] therefore, the actual CO_{2e} emissions due to electricity consumption will be at least 14 percent less than that predicted for any buildings designed and constructed by the County.

When the worst-case scenario analysis of Tier II is compared with the suggested thresholds for GHG emissions provided by CAPCOA, operation of Tier II of the proposed project would exceed the suggested cap and trade threshold of 10,000 metric tons CO_{2e} per year as well as the suggested unit-based threshold of 50,000 square feet of commercial building space, CAPCOA's suggested quantitative threshold of 900 metric tons of CO_{2e} per year, and the BAAQMD's adopted quantitative threshold of 1,100 metric tons per year. On this basis, specific to this proposed project only, and because the County is attempting to evaluate the impacts of the proposed project from a conservative worst-case scenario, it can be conservatively determined that the GHG emission impacts due to operation of the proposed project may be above the level of significance.

Cumulative Impacts

Tier I

It was determined that there are forty-two (42) projects that are anticipated to be implemented within the construction period for both tiers of the proposed project occurring within an approximate 3-mile radius of the proposed project site (Section 2.0, *Project Description*, Table 2.6-1, *List of Related Projects*), but for the purposes of GHG analysis, there are many more projects in the County, the State, and worldwide that would contribute to cumulative global GHG emissions.

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[55] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Air Quality and Greenhouse Gas Emissions Technical Impact Report*. Pasadena, CA.

[56] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

[57] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

[58] U.S. Green Building Council, Leadership in Energy and Environmental Design Green Building Rating System. October 2007. *New Construction and Major Renovations*. Washington, DC.

Due to the fact that GHG emissions from construction of Tier I of the proposed project as analyzed in this EIR may have the potential to be above the level of significance, implementation of the proposed project would be expected to result in cumulative impacts when considered with construction and operation of the related past, present, or reasonably foreseeable, probable future projects. However the operation of Tier I when cumulatively considered, would not have considerable operational impacts and would not be expected to contribute to cumulative operational impacts.

Tier II

It was determined that there are forty-two (42) projects that are anticipated to be implemented within the construction period for both tiers of the proposed project occurring within an approximate 3-mile radius of the proposed project site (Section 2.0, *Project Description*, Table 2.6-1), but for the purposes of GHG analysis, there are many more projects in the County, the State, and worldwide that would contribute to cumulative global GHG emissions. Due to the fact that GHG emissions from construction of Tier II and operation of Tier II of the proposed project as analyzed in this EIR may have the potential to be above the level of significance, implementation of the proposed project would be expected to result in cumulative impacts when considered with construction and operation of the related past, present, or reasonably foreseeable, probable future projects.

3.5.5 Mitigation Measures

The incorporation of GHG emission mitigation measure GHG-1 would ensure a full implementation of sustainable building design for the proposed project to assist the County in attaining the goal of reducing GHG emissions to 1990 levels by the year 2020 as required by AB 32.

The California Office of Attorney General's guidance to local agencies for addressing GHG emission impacts is recommended for consideration by the County to increase sustainability and reduce GHG emission impacts associated with operation of the proposed project.[59] Among the 52 general applicable project-level measures that can be applied to a diverse range of projects, seven (7) measures have been incorporated into the design of Tier I of the proposed project. It is anticipated that these measures would also be incorporated in the design for Tier II of the proposed project.

The CARB's guidance on 44 early action measures to reduce GHG emissions has been considered by the County in order to reduce GHG emission impacts associated with implementation of the proposed project. In developing mitigation measures for the proposed project, only the feasible GHG emission reduction early action measures provided by the CARB that are also applicable to the proposed project have been recommended for incorporation.

[59] California Department of Justice Office of the Attorney General. Updated 9 December 2008. *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*. Sacramento, CA.

Tier I

Measure GHG-1

Prior to construction of the proposed project, the final design plan and schemes for Tier I shall be reviewed to ensure that the County of Los Angeles conforms to its commitments pursuant to the California Climate Action Registry and the greenhouse gas emissions reduction targets established in Assembly Bill 32 are dependent on the incorporation of this mitigation measure, which is based on seven (7) of the sustainable design strategies or comparable measures recommended by the California Office of Attorney General to reduce carbon dioxide (CO_2) emissions per capita:

- Design buildings to be energy efficient. Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use
- Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings
- Create water-efficient landscapes
- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on site can drastically reduce the need for energy-intensive imported water at the site.)
- Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods
- Incorporate provisions for future public transit into project design
- Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio

The review shall further ensure that all applicable sustainable design measures or comparable measures have been incorporated into the final project design.

Tier II

Measure GHG-1

Prior to construction of the proposed project, the final design plan and schemes for Tier II shall be reviewed to ensure that the County of Los Angeles conforms to its commitments pursuant to the California Climate Action Registry and the greenhouse gas emissions reduction targets established in Assembly Bill 32 are dependent on the incorporation of this mitigation measure, which is based on seven (7) of the sustainable design strategies or comparable measures recommended by the California Office of Attorney General to reduce carbon dioxide (CO_2) emissions per capita:

- Design buildings to be energy efficient. Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use

- Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings

- Create water-efficient landscapes

- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on site can drastically reduce the need for energy-intensive imported water at the site.)

- Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods

- Incorporate provisions for future public transit into project design

- Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio

The review shall further ensure that all applicable sustainable design measures or comparable measures have been incorporated into the final project design.

3.5.6 Level of Significance after Mitigation

Tier I

Mitigation measure GHG-1 would reduce CO_2 emissions contributed by operation of Tier I of the proposed project, thereby assisting compliance with the goals of AB 32 to reduce CO_{2e} emissions to 1990 levels by the year 2020. Mitigation measure GHG-1 would ensure that indirect and cumulative GHG emission impacts would be reduced to the maximum extent feasible. After implementation of mitigation measure GHG-1, potential GHG emission impacts associated with operation of Tier I would remain at below the level of significance under a qualitative or quantitative analysis. Mitigation measure GHG-1 would not affect construction emissions. Therefore, construction of Tier I of the proposed project would be expected to remain above the level of significance assuming application of CAPCOA's suggested quantitative threshold of 900 metric tons of CO_{2e} per year or the BAAQMD's adopted threshold of 1,100 metric tons per year.

Tier II

Mitigation measure GHG-1 would reduce CO_2 emissions contributed by operation of Tier II of the proposed project, thereby assisting compliance with the goals of AB 32 to reduce CO_{2e} emissions to 1990 levels by the year 2020. Mitigation measure GHG-1 would ensure that indirect and cumulative GHG emission impacts would be reduced to the maximum extent feasible. However, potential GHG emission impacts associated with construction and operation of Tier II would remain as significant and unavoidable assuming application of CAPCOA's suggested quantitative threshold of 900 metric tons of CO_{2e} per year or the BAAQMD's adopted threshold of 1,100 metric tons per year, which the County is using in order to evaluate the proposed project from a conservative, worst-case scenario.

3.6 HAZARDS AND HAZARDOUS MATERIALS

As a result of the Initial Study, the County of Los Angeles (County) determined that the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in impacts related to hazards and hazardous materials.[1] Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts from hazards and hazardous materials.

The analysis of hazards and hazardous materials consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the proposed project site, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential hazards and hazardous materials that could be associated with the proposed project site were evaluated with regard to the Limited Environmental Subsurface Investigation prepared by URS in June 2009,[2] as well as published and unpublished literature. The potential for impacts from hazards and hazardous materials have been analyzed in accordance with the data compiled by Environmental Data Resources, Inc.[3,4,5]

3.6.1 Regulatory Framework

Federal

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, also known as the Superfund, outlines the potential liability related to the cleanup of hazardous substances, available defenses to such liability, appropriate inquiry into site status under Superfund, which is the federal government's program to clean up the nation's uncontrolled hazardous waste sites, statutory definitions of hazardous substances and petroleum products, and the petroleum product exclusion under CERCLA.[6]

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[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

[2] County of Los Angeles Department of Public Works. 10 June 2009. *Limited Environmental Subsurface Investigation, Proposed MACC Building and ED/Ancillary Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center, 12021 South Wilmington Avenue, Los Angeles, CA*.

[3] Environmental Data Resources, Inc. 29 December 2008. *The EDR Aerial Photo Decade Package, Martin Luther King Medical Center, 12021 South Wilmington Avenue, Los Angeles, CA 90059*. Inquiry Number: 2388899.5.

[4] Environmental Data Resources, Inc. 23 December 2008. *The EDR Radius Map Report with GeoCheck, Martin Luther King Medical Center, 12021 South Wilmington Avenue, Los Angeles, CA 90059*. Inquiry Number: 2388899.2s.

[5] Environmental Data Resources, Inc. 23 December 2008. *The EDR Historical Topographic Map Report, Martin Luther King Medical Center, 12021 South Wilmington Avenue, Los Angeles, CA 90059*. Inquiry Number: 2388899.4.

[6] *United States Code*, Title 42, Chapter 103, Subchapter I: "Hazardous Substances Releases, Liability, Compensation." Available at: http://www.law.cornell.edu/uscode/html/uscode42/usc_sup_01_42_10_103.html

Superfund Amendment and Reauthorization Act, Title III

The Superfund Amendment and Reauthorization Act (SARA), Title III of 1986 is the Emergency Planning and Community Right-to-Know Act.[7] Facilities are required to report the following items on U.S. Environmental Protection Agency (USEPA) Form R, the Toxic Chemical Release Inventory Reporting Form: facility identification, off-site locations where toxic chemicals are transferred in wastes, chemical-specific information, and supplemental information.

Form R requires a facility to list the hazardous substances that are handled on site and to account for the total aggregate releases of listed toxic chemicals for the calendar year. Releases to the environment include emissions to the air, discharges to surface water, and on-site releases to land and underground injection wells.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 was the first major federal act regulating the potential health and environmental problems associated with hazardous and non-hazardous solid waste.[8] RCRA and the implementation regulations developed by the U.S. Environmental Protection Agency (EPA) provide the general framework for the national hazardous and non-hazardous waste management systems. This framework includes the determination of whether hazardous wastes are being generated, techniques for tracking wastes to eventual disposal, and the design and permitting of hazardous waste management facilities.

RCRA amendments enacted in 1984 and 1986 began the process of eliminating land disposal as the principal hazardous waste disposal method. Hazardous waste regulations promulgated in 1991 address site selection, design, construction, operation, monitoring, corrective action, and closure of disposal facilities. Additional regulations addressing solid waste issues are contained in 40 Code of Federal Regulations (CFR), Part 258.

Federal Aviation Administration

The Federal Aviation Administration (FAA) requires review of any construction plans and specifications for development proximate to airports that exceed certain height criteria.[9] These minimum height requirements include any construction or alteration more than 200 feet in height above ground level and/or at a greater height than that of an imaginary surface extending outward and upward at a slope of 100 to 1 for a horizontal distance of 20,000 feet from the nearest point of the nearest runway.[10]

This review is initiated using FAA Form 7460, Notice of Proposed Construction or Alteration, if necessary. The FAA determines whether there is an obstruction to the safe and efficient use of airspace

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[7] *United States Code*, Title 42, Chapter 116 et. seq: "Emergency Planning and Community Right-to-Know Act." Available at: http://www.law.cornell.edu/uscode/html/uscode42/usc_sup_01_42_10_116.html

[8] *United States Code*, Title 42, Chapter 82, Subchapter I, §§ 6901 et. seq.: "Solid Waste Disposal Act, Resource Conservation and Recovery Act of 1986." Available at: http://www.law.cornell.edu/uscode/html/uscode42/usc_sup_01_42_10_82.html

[9] *Code of Federal Regulations*, Title 14, Part 77. 5. May 2003. "Aeronautics and Space, Objects Affecting Navigable Airspace." Available at: http://www.access.gpo.gov/nara/cfr/waisidx_05/14cfr77_05.html

[10] *Federal Aviation Regulations*, Part 77, "Objects Affecting Navigable Airspace." Available at: http://www.pctpa.org/library/aluc/aluc_appB.PDF.

over part or all of a proposed land use change under Federal Aviation Regulations Part 77, Objects Affecting Navigable Airspace, during this review.

State

Hazardous Waste Control Law of 1972

The Hazardous Waste Control Law of 1972 is the original hazardous waste control law in California. This law initiated programs that track hazardous waste generators, their hazardous waste streams, and their hazardous waste handling practices.

Title 22 and Title 23 of the California Code of Regulations

In California, Titles 22 and 23 of the California Code of Regulations (CCR) address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes. Title 23 identifies public health and safety issues related to hazardous materials and wastes and specifies disposal options.

Hazardous Materials Release Response Plans and Inventory Law of 1986

The Hazardous Materials Release Response Plans and Inventory Law of 1986 (Business Plan Act)[11] governs hazardous materials handling, reporting requirements, and local agency surveillance programs.

Hazardous Substances Account Act (State Superfund)

Chapter 6.8 of the California Health and Safety Code requires DTSC to include "the largest manageable number" of potentially responsible parties ("PRP") in any cleanup order that applies to a multiple PRP site after considering certain factors, including the adequacy of the evidence of each PRP's liability, the financial viability of each PRP, and the degree to which each PRP contributed to the release of hazardous substances at the site.

Medical Waste Management Act (California Health and Safety Code Sections 117600-118360)

The Department of Public Health shall adopt regulations that will establish statewide standards for uniformity in the implementation and administration of this act and will promote waste minimization and source reduction.

Local

Los Angeles County General Plan

The Safety element of the County of Los Angeles General Plan assesses threats to public health and safety from a variety of hazards and recommends strategies to reduce these threats. There are four policies in the Safety element that apply to projects within the County, including the unincorporated territory of the County of Los Angeles:[12]

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[11] *California Health and Safety Code*, Chapter 6.8, §25500 et seq. (1985, as amended). Available at: http://www.aroundthecapitol.com/code/code.html?sec=hsc&codesection=25404-25404.9

[12] County of Los Angeles Department of Regional Planning. December 1990. *County of Los Angeles General Plan, Safety*

- Maintain and strengthen the review of projects and development proposals and upgrade Los Angeles County Fire Department prevention standards and mitigation measures in areas of urban fire hazard
- Review proposed development projects involving the use or storage of hazardous materials
- Disapprove proposals that cannot properly mitigate unacceptable threats to public health and safety to the satisfaction of responsible agencies
- Strengthen the capability of County agencies to effectively respond to emergencies

3.6.2 Existing Conditions

3.6.2.1 Routine Transport, Use, or Disposal of Hazardous Materials

The existing Martin Luther King, Jr. Medical Center is a hospital registered as a small- and large-quantity generator of hazardous materials such as waste oil and mixed oil; oxygenated solvents including acetone, butanol, and ethyl acetate; spent halogenated solvents; and other hazardous materials including batteries, lamps, pesticides, thermostats, mercury, silver and polychlorinated biphenyls. The existing Martin Luther King, Jr. Medical Center also deals with biomedical and radiological wastes. However, there are specific government regulations restricting the transport, use, and disposal of these hazardous materials, and the existing hospital does not entail the use of such materials beyond the regulated parameters.[13]

The existing Martin Luther King, Jr. Medical Center is listed on the registered underground storage tanks (UST) and Historical UST databases due to the existence of 11 USTs at the power plant on the campus. These USTs consist of one unleaded gasoline tank and one waste tank installed in 1970 and nine diesel tanks installed between 1970 and 1980. No leaks have been reported to originate from these USTs.[14] All USTs have to be registered with the California Environmental Protection Agency to account for the presence of USTs at the site.[15] There are no other County requirements or commitments associated with having the UST listed. The County will remain on this list as long as long as there are registered USTs at the site.

3.6.2.2 Release of Hazardous Materials Into the Environment

A leaking underground storage tank (LUST) containing gasoline was discovered at the existing Martin Luther King, Jr. Medical Center during the closure of the UST in 1988. The unauthorized release of gasoline only affected soil. The impacted soil was remediated and the case was closed in 1996.[16] This unauthorized release of gasoline into the soil also resulted in the hospital being listed on the California Hazardous Materials Incident Report System (CHMIRS). The hospital is also identified as a CHMIRS site due to the unauthorized release of approximately 14,000 gallons of oily water that originated from

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Element. Los Angeles, CA.

[13] Environmental Data Resources, Inc. 23 December 2008. *The EDR Radius Map Report with GeoCheck, Martin Luther King Medical Center, 12021 South Wilmington Avenue, Los Angeles, CA 90059*. Inquiry Number: 2388899.2s.

[14] Environmental data Resources, Inc. 23 December 2008. *The EDR Radius Map Report with GeoCheck, Martin Luther King Medical Center, 12021 South Wilmington Avenue, Los Angeles, CA 90059*. Inquiry Number: 2388899.2s.

[15] United States Environmental Protection Agency. Office of Underground Storage Tanks. Accessed August 2010. Available at: http://www.epa.gov/oust/

[16] Environmental data Resources, Inc. 23 December 2008. *The EDR Radius Map Report with GeoCheck, Martin Luther King Medical Center, 12021 South Wilmington Avenue, Los Angeles, CA 90059*. Inquiry Number: 2388899.2s.

a ruptured pipe in the hospital power plant. The oily water was pumped up into tanker trucks for off-site disposal.[17]

The existing Martin Luther King, Jr. Medical Center is identified on the Emissions Inventory Database, maintained by the South Coast Air Quality Management District (SCAQMD), for the release of total organic hydrocarbon gases, reactive gases, carbon monoxide, oxides of nitrogen, oxides of sulfur, and particulate matter.[18]

3.6.2.3 Existing or Proposed Schools

The existing Martin Luther King, Jr. Medical Center is located within one quarter mile of the following schools: King-Drew Medical Magnet High School located at 1601 East 120thth Street adjacent to the proposed project site to the north; Lincoln Drew Elementary School located at 1667 East 118th Street approximately 0.1 mile to the north; Carver Elementary School located at 1425 East 120th Street approximately 0.21 mile to the west; and Harriet Tubman High School, Compton Community Day School, and Cesar Chavez Alternative School, which are all located at 12501 South Wilmington Avenue approximately 0.25 mile to the south of the proposed project site.

3.6.2.4 Hazardous Materials Sites Pursuant to Government Code Section 65962.5

The existing Martin Luther King, Jr. Medical Center is not identified in the most recent version of the Hazardous Materials and Substance Sites List maintained by the California Environmental Protection Agency, DTSC.[19]

3.6.2.5 Proposed Project Site Located in an Airport Land Use Plan, within 2 Miles of a Public Airport or Public Use Airport

There are no public airports or public airports within 2 miles of the proposed project site. The nearest airports to the proposed project site are the Compton/Woodley Airport located at 901 West Alondra Boulevard in the City of Compton approximately 2.1 miles south; the Saint Francis Medical Center Helistop located in the City of Lynwood approximately 2.7 miles east; the Gardena Valley Airport located in the City of Gardena approximately 4 miles southeast; and the Hawthorne Municipal Airport located in the City of Hawthorne approximately 4.6 miles west. According to the Los Angeles County General Plan,[20] the proposed project is not within or near an airport land use plan.

3.6.2.6 Proposed Project Site Located in the Vicinity of a Private Airstrip

The nearest private airstrip to the existing Martin Luther king, Jr. Medical Center is located in Playa Vista at 5510 Lincoln Boulevard approximately 11.5 miles northwest of the proposed project site.[21] However, a helipad is located at the proposed project site, on the roof of the Inpatient Tower.

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[17] Environmental Data Resources, Inc. 23 December 2008. *The EDR Radius Map Report with GeoCheck, Martin Luther King Medical Center, 12021 South Wilmington Avenue, Los Angeles, CA 90059*. Inquiry Number: 2388899.2s.

[18] Environmental Data Resources, Inc. 23 December 2008. *The EDR Radius Map Report with GeoCheck, Martin Luther King Medical Center, 12021 South Wilmington Avenue, Los Angeles, CA 90059*. Inquiry Number: 2388899.2s.

[19] California Environmental Protection Agency, Department of Toxic Substances Control. 2 February 2010. "Hazardous Waste and Substances Site List."

[20] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[21] Airport IQ Data Center. Accessed on 10 April 2008. Web site. Available at: http://www.gcr1.com/5010web/

3.6.2.7 Emergency Response Plan or Emergency Evacuation Plan

Consistent with the Safety element of the County of Los Angeles General Plan,[22] the purpose of the existing Martin Luther King, Jr. Medical Center is to improve conditions related to healthcare services. No part of the existing hospital interferes with any existing emergency response plan or evacuation plan.

3.6.2.8 Wildland Fires

The existing Martin Luther King, Jr. Medical Center is located in an urban environment without adjacent or nearby wildlands. In addition, the existing Martin Luther King, Jr. Medical Center location is not considered to be in a fire hazard severity zone.[23] The nearest fire hazard zone is well over 10 miles from the proposed project site. Therefore, the existing Martin Luther king, Jr. Medical Center would not be expected to result in significant impacts from hazards and hazardous materials related to exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

3.6.3 Significance Thresholds

The potential for the proposed project to result in impacts related to hazards and hazardous materials was analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines. The project would normally be considered to have a significant impact to hazards and hazardous materials when the potential for any one of the following eight thresholds occurs:

- Creates a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
- Creates a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment
- Emits hazardous emissions or handles hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school
- Is located on a site which is included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment
- Is located within in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and results in a safety hazard for people residing or working in the project area

[22] County of Los Angeles Department of Regional Planning. December 1990. *County of Los Angeles General Plan, Safety Element*. Los Angeles, CA.

[23] California Department of Forestry and Fire Protection, 1997. Los Angeles Fire Hazard Severity Zoning (FHSZ) Map. Sacramento, CA. Available at: http://www.fire.ca.gov/fire_prevention/fhsz_maps/fhsz_maps_losangeles.php

- Is within the vicinity of a private airstrip, and would result in a safety hazard for people residing or working in the project area

- Impairs implementation of or physically interferes with an adopted emergency response plan or emergency evacuation plan

- Exposes people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands

3.6.4 Impact Analysis

3.6.4.1 Routine Transport, Use, or Disposal of Hazardous Materials

Tier I

Tier I of the proposed project would not create a significant hazard that could affect the public or the environment through the routine transport, use, or disposal of hazardous materials. The proposed project is a hospital registered as a small- and large-quantity generator of hazardous materials. These hazardous materials include waste oil and mixed oil; oxygenated solvents including acetone, butanol, and ethyl acetate; spent halogenated solvents; and other hazardous materials including batteries, lamps, pesticides, thermostats, mercury, silver and polychlorinated biphenyls. The proposed project would also continue to generate biomedical and radiological wastes. However, the amount of these wastes would not be increased as a result of Tier I and there are specific government regulations restricting the transport, use, and disposal of these hazardous materials. The proposed project does not entail the use of such materials beyond regulated parameters. Any hazardous materials, substances, or wastes that are stored, used, or generated at the proposed project site shall be handled or disposed of in compliance with all existing regulations. Therefore, there are no expected impacts to the public or the environment related to the routine transport, use, or disposal of hazardous materials.

Tier II

Tier II of the proposed project would not create a significant hazard that could affect the public or the environment through the routine transport, use, or disposal of hazardous materials. The proposed project is a hospital registered as a small- and large-quantity generator of hazardous materials such as small medical wastes such as needles to waste oil and mixed oil; oxygenated solvents including acetone, butanol, and ethyl acetate; spent halogenated solvents; and other hazardous materials including batteries, lamps, pesticides, thermostats, mercury, silver and polychlorinated biphenyls. The proposed project will also generate biomedical and radiological wastes. However, there are specific government regulations restricting the transport, use, and disposal of these hazardous materials, and the proposed project does not entail the use of such materials beyond regulated parameters. Any hazardous materials, substances, or wastes that are stored, used, or generated at the proposed project site shall be handled or disposed of in compliance with all existing regulations. Therefore, there are no expected impacts to the public or the environment related to the routine transport, use, or disposal of hazardous materials.

3.6.4.2 Release of Hazardous Materials into the Environment

Tier I

Tier I of the proposed project would create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The removal of asbestos-containing materials (ACMs) or lead-based paints (LBPs) at the proposed project site creates the potential for a release of asbestos and lead into the environment. In addition, fuels and lubricants used for construction vehicles may impact the site due to leakage, spillage, or accidents. Therefore, implementation of the proposed project has the potential to result in significant impacts to the environment related to the accidental release of ACMs and LBPs, and will require the consideration of mitigation measures.

The proposed project would be expected to result in less than significant impacts from hazards and hazardous materials in relation to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials with the incorporation of mitigation measures. The proposed project site is the location of documented past releases of gasoline and oil from a LUST, which occurred prior to existing underground storage tank LUST regulations. Cleanup of the site has been completed for the release of oil and gasoline, and no further action is warranted.[24] Because the proposed project site is both a small- and a large-quantity generator of hazardous materials, the potential exists for a hazardous materials release to occur. The proposed project tiers do not directly address hospital operations that require the use or transport of hazardous materials and the proposed project would not entail use of such materials beyond regulated parameters. However, as part of the proposed project, it is anticipated that some emergency generators and USTs may have to be relocated. To prevent impacts, tank relocation would be conducted according to the following applicable federal and state regulations related to tank management: Code of Federal Regulations (CFR) 40, Part 112; 40 CFR, Part 280; CFR 281; 40 CFR, Part 282; and the California Code of Regulations (CCR) Title 22 and Title 23 Regulations. It is unlikely that the proposed project would result in accidental leaks and spills that would affect the public or the environment. However, mitigation has been proposed to ensure that the impact remains less than significant during construction-related activities. Therefore, the proposed project would be expected to result in less than significant impacts from hazards and hazardous materials related to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials with the incorporation of mitigation measures.

Tier II

In the event that the County decides to demolish the existing MACC building, emergency room, storage building or the cooling towers, construction of the proposed project may result in the accidental release of ACMs or LBPs into the environment, given the prevalent use of ACMs and LBPs in the building industry at the time period these buildings were constructed. Construction equipment–related fuels and lubricants also have the potential for accidental release into the environment if proper care is not utilized.

Tier II of the proposed project would create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into

[24] Environmental Data Resources, Inc. 23 December 2008. *The EDR Radius Map Report with GeoCheck, Martin Luther King Medical Center, 12021 South Wilmington Avenue, Los Angeles, CA 90059*. Inquiry Number: 2388899.2s.

the environment. The removal of ACMs and LBPs at the proposed project site creates the potential for a release of asbestos and lead into the environment. In addition, fuels and lubricants used for construction vehicles may impact the site due to leakage, spillage, or accidents. Therefore, implementation of the proposed project has the potential to result in significant impacts to the environment related to the accidental release of ACMs and LBPs, and will require the consideration of mitigation measures.

The proposed project would be expected to result in less than significant impacts from hazards and hazardous materials in relation to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials with the incorporation of mitigation measures. The proposed project site is the location of documented past releases of gasoline and oil from a LUST, which occurred prior to existing underground storage tank LUST regulations. Cleanup of the site has been completed for the release of oil and gasoline, and no further action is warranted.[25] Because the proposed project site is both a small- and a large-quantity generator of hazardous materials, the potential exists for a hazardous materials release to occur. The proposed project tiers do not directly address hospital operations that require the use or transport of hazardous materials and the proposed project would not entail use of such materials beyond regulated parameters. However, as part of the proposed project, it is anticipated that some emergency generators and USTs may have to be relocated. To prevent impacts, tank relocation would be conducted according to the following applicable federal and state regulations related to tank management: Code of Federal Regulations (CFR) 40, Part 112; 40 CFR, Part 280; CFR 281; 40 CFR, Part 282; and the California Code of Regulations (CCR) Title 22 and Title 23 Regulations. It is unlikely that the proposed project would result in accidental leaks and spills that would affect the public or the environment. However, mitigation has been proposed to ensure that the impact remains less than significant during construction-related activities. Therefore, the proposed project would be expected to result in less than significant impacts from hazards and hazardous materials related to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials with the incorporation of mitigation measures.

3.6.4.3 Existing or Proposed Schools

Tier I

Tier I of the proposed project would have the potential to result in significant impacts related to creating a significant hazard that would be reduced to below the level of significance with the incorporation of mitigation measures, from hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste, to existing or proposed schools located within one-quarter mile of the project site. There are six schools located within one-quarter mile of the proposed project. These schools are: Lincoln Drew Elementary School and Headstart located 0.10 mile to the north; Carver Elementary located 0.21 mile to the west; Harriet Tubman High School located 0.25 mile south; Cesar Chavez Alternative School located 0.25 mile south; Compton Community Day Middle School located 0.25 mile south; and King Drew Magnet High School located adjacent to the proposed project campus on East 120th Street. The proposed project is a hospital that routinely handles and transports hazardous materials for disposal. While the volume of hazardous materials would likely increase, from the current operational amounts with completion of the proposed project, the use of such materials is controlled by existing government regulations and the proposed project

[25] Environmental Data Resources, Inc. 23 December 2008. *The EDR Radius Map Report with GeoCheck, Martin Luther King Medical Center, 12021 South Wilmington Avenue, Los Angeles, CA 90059*. Inquiry Number: 2388899.2s.

would not entail use of hazardous materials beyond regulated parameters. Therefore, there would be no expected impacts with the incorporation of mitigation measures from hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste, to existing or proposed schools located within one-quarter mile of the project site.

Tier II

Tier II of the proposed project would have the potential to result in significant impacts related to creating a significant hazard that would be reduced to below the level of significance with the incorporation of mitigation measures, from hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste, to existing or proposed schools located within one-quarter mile of the project site. There are six schools located within one-quarter mile of the proposed project. These schools are: Lincoln Drew Elementary School and Headstart located 0.10 mile to the north; Carver Elementary located 0.21 mile to the west; Harriet Tubman High School located 0.25 mile south; Cesar Chavez Alternative School located 0.25 mile south; Compton Community Day Middle School located 0.25 mile south; and King Drew Magnet High School located adjacent to the proposed project campus on East 120th Street. The proposed project is a hospital that routinely handles and transports hazardous materials for disposal. While the volume of hazardous materials would likely increase, from the current operational amounts with completion of the proposed project, the use of such materials is controlled by existing government regulations and the proposed project would not entail use of hazardous materials beyond regulated parameters. Therefore, there would be no expected impacts with the incorporation of mitigation measures from hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste, to existing or proposed schools located within one-quarter mile of the project site.

3.6.4.4 Hazardous Waste Sites

Tier I

Tier I of the proposed project would not be located on a hazardous waste site that would result in creating a significant hazard to the public or the environment. The existing Martin Luther King, Jr. Medical Center is not identified in the most recent version of the Hazardous Materials and Substance Sites List maintained by the California Environmental Protection Agency, Department of Toxic Substances Control.[26] Therefore, the proposed project would not be expected to impact the public or the environment.

Tier II

Tier II of the proposed project would not be located on a hazardous waste site that would result in creating a significant hazard to the public or the environment. The existing Martin Luther King, Jr. Medical Center is not identified in the most recent version of the Hazardous Materials and Substance Sites List maintained by the California Environmental Protection Agency, Department of Toxic Substances Control.[27] Therefore, the proposed project would not be expected to impact the public or the environment.

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[26] California Environmental Protection Agency, Department of Toxic Substances Control. 10 February 2010. "Hazardous Waste and Substances Site List."

[27] California Environmental Protection Agency, Department of Toxic Substances Control. 10 February 2010. "Hazardous Waste and Substances Site List."

3.6.4.5 Proposed Project Located near Airport

Tier I

Tier I of the proposed project would not result in a significant impact from hazards and hazardous materials in relation to proximity to a public airport and the creation of safety hazards to people residing or working in the proposed project area. The nearest airports are the Compton/Woodley Airport, located at 901 West Alondra Boulevard in the City of Compton, approximately 2.1 miles south; the Saint Francis Medical Center Helistop in the City of Lynwood, approximately 2.7 miles east; the Gardena Valley Airport in the City of Gardena, approximately 4 miles southeast; and the Hawthorne Municipal Airport in the City of Hawthorne, approximately 4.6 miles west of the proposed project site. Therefore, implementation of the proposed project would not result in significant impacts from safety hazards and hazardous materials in relation to proximity to a public airport to the people residing or working within the proposed project boundaries.

Tier II

Tier II of the proposed project would not result in a significant impact from hazards and hazardous materials in relation to proximity to a public airport and the creation of safety hazards to people residing or working in the proposed project area. The nearest airports are the Compton/Woodley Airport, located at 901 West Alondra Boulevard in the City of Compton, approximately 2.1 miles south; the Saint Francis Medical Center Helistop in the City of Lynwood, approximately 2.7 miles east; the Gardena Valley Airport in the City of Gardena, approximately 4 miles southeast; and the Hawthorne Municipal Airport in the City of Hawthorne, approximately 4.6 miles west of the proposed project site. Therefore, implementation of the proposed project would not result in significant impacts from safety hazards and hazardous materials in relation to proximity to a public airport to the people residing or working within the proposed project boundaries.

3.6.4.6 Proposed Project Located near Private Airstrip

Tier I

Tier I of the proposed project would not result in a significant impact to people residing or working within the project area due to project's proposed location in the vicinity of a private airstrip. The nearest private airstrip is located in Playa Vista at 5510 Lincoln Boulevard, approximately 11.5 miles northwest of the proposed project site.[28] A heliport is currently located on site at the proposed project site. The heliport is currently not in use at the existing Martin Luther King, Jr. Medical Center Campus (existing campus), as it is associated with the emergency functions that are not currently in operation at the existing campus. The heliport would not be altered or impacted by the proposed project. As such, implementation of the proposed project would not be expected to result in significant impacts from safety hazards and hazardous materials in relation to proximity to a private airport to the people residing or working within the proposed project boundaries.

Tier II

Tier II of the proposed project would not result in a significant impact to people residing or working within the project area due to project's proposed location in the vicinity of a private airstrip. The nearest private airstrip is located in Playa Vista at 5510 Lincoln Boulevard, approximately 11.5 miles

[28] Airport IQ Data Center. Accessed on 10 April 2008. Web site. Available at: http://www.gcr1.com/5010web/

northwest of the proposed project site.[29] A heliport is currently located on site at the proposed project site. The heliport is currently not in use at the existing Martin Luther King, Jr. Medical Center Campus (existing campus), as it is associated with the emergency functions that are not currently in operation at the existing campus. The heliport would not be altered or impacted by the proposed project. As such, implementation of the proposed project would not be expected to result in significant impacts from safety hazards and hazardous materials in relation to proximity to a private airport to the people residing or working within the proposed project boundaries.

3.6.4.7 Emergency Response Plan or Emergency Evacuation Plan

Tier I

Tier I of the proposed project would not be expected to impair implementation of, or physically interfere with an adopted emergency response plan or an emergency evacuation plan. Currently, the existing campus is not fully operational. However, the existing campus provides various outpatient and administrative support services. Tier I of the proposed project is anticipated to interfere with an emergency response plan or evacuation plan; however, it is anticipated that the site Emergency Response and Evacuation plans will be updated as appropriate, addressing all campus development, as each building is completed. Further, the proposed improvements at the campus will result in additional medical facilities to address medical needs related to emergencies in the community of Willowbrook and surrounding areas. This will result in the availability of enhanced health care accessibility, and will provide community support facilities and uses, and thus a beneficial impact would occur. The proposed project would therefore not be expected to interfere with the emergency response plan or the emergency evacuation plan. Therefore, Tier I of the proposed project would not be expected to result in significant impacts to hazards and hazardous resources related to emergency response plan or emergency evacuation plan.

Tier II

Tier II of the proposed project would not be expected to impair implementation of, or physically interfere with an adopted emergency response plan or an emergency evacuation plan. Currently, the existing campus is not fully operational. However, the existing campus provides various outpatient and administrative support services. Tier II of the proposed project is anticipated to interfere with an emergency response plan or evacuation plan; however, it is anticipated that the site Emergency Response and Evacuation plans will be updated as appropriate, addressing all campus development, as each building is completed. Further, the proposed improvements at the campus will result in additional medical facilities to address medical needs related to emergencies in the community of Willowbrook and surrounding areas. This will result in the availability of enhanced health care accessibility, and will provide community support facilities and uses, and thus a beneficial impact would occur. The proposed project would therefore not be expected to interfere with the emergency response plan or the emergency evacuation plan. Therefore, Tier II of the proposed project would not be expected to result in significant impacts to hazards and hazardous resources related to emergency response plan or emergency evacuation plan.

[29] Airport IQ Data Center. Accessed on 10 April 2008. Web site. Available at: http://www.gcr1.com/5010web/

3.6.4.8 Wildland Fires

Tier I

Tier I of the proposed project would not be expected to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. There are no wildlands that would be subject to fire on or near the proposed project site.[30] The proposed project site is located in an urban environment served by fire hydrants and local fire stations, and without adjacent or nearby wildlands. In addition, the proposed project location is not considered to be in a fire hazard severity zone.[31] Therefore, Tier II of the proposed project would not be expected to increase the impact or to result in significant impacts related to wildland fires.

Tier II

Tier II of the proposed project would not be expected to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. There are no wildlands that would be subject to fire on or near the proposed project site.[32] The proposed project site is located in an urban environment served by fire hydrants and local fire stations, and without adjacent or nearby wildlands. In addition, the proposed project location is not considered to be in a fire hazard severity zone.[33] Therefore, Tier II of the proposed project would not be expected to increase the impact or to result in significant impacts related to wildland fires.

3.6.4.9 Cumulative Impacts

The incremental impact of the proposed project, when added to the related past, present, or reasonably foreseeable, probable future projects listed in Section 2.0, *Project Description*, would not result in cumulative impacts related to hazards and hazardous materials.

Tier I

Because the hazards and hazardous materials impacts expected from the implementation of the proposed project do not affect lands outside the boundaries of the proposed project site, these impacts do not create any cumulative impacts on the environment outside of the proposed project boundaries. Additionally, as previously mentioned, there are specific government regulations restricting the transport, use, and disposal of these hazardous materials, and the proposed project would does not entail the use of such materials beyond regulated parameters. Although there are schools and residences that are proposed to be developed located on near the proposed project site, these related projects would be no more at risk of cumulative impacts related to hazards and hazardous materials than the existing sensitive receptors on and surrounding the proposed project site. The use and transport of hazardous materials would comply with the established regulations and would ensure that cumulative impacts are below the level of significance.

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[30] California Department of Forestry and Fire Protection. 1997. Los Angeles Fire Hazard Severity Zoning (FHSZ) Map. Sacramento, CA. Available at: http://www.fire.ca.gov/fire_prevention/fhsz_maps/fhsz_maps_losangeles.php

[31] California Department of Forestry and Fire Protection. 1997. Los Angeles Fire Hazard Severity Zoning (FHSZ) Map. Sacramento, CA. Available at: http://www.fire.ca.gov/fire_prevention/fhsz_maps/fhsz_maps_losangeles.php

[32] California Department of Forestry and Fire Protection. 1997. Los Angeles Fire Hazard Severity Zoning (FHSZ) Map. Sacramento, CA. Available at: http://www.fire.ca.gov/fire_prevention/fhsz_maps/fhsz_maps_losangeles.php

[33] California Department of Forestry and Fire Protection. 1997. Los Angeles Fire Hazard Severity Zoning (FHSZ) Map. Sacramento, CA. Available at: http://www.fire.ca.gov/fire_prevention/fhsz_maps/fhsz_maps_losangeles.php

Tier II

Because the hazards and hazardous materials impacts expected from the implementation of the proposed project do not affect lands outside the boundaries of the proposed project site, these impacts do not create any cumulative impacts on the environment outside of the proposed project boundaries. Additionally, as previously mentioned, there are specific government regulations restricting the transport, use, and disposal of these hazardous materials, and the proposed project would does not entail the use of such materials beyond regulated parameters. Although there are schools and residences that are proposed to be developed located on near the proposed project site, these related projects would be no more at risk of cumulative impacts related to hazards and hazardous materials than the existing sensitive receptors on and surrounding the proposed project site. The use and transport of hazardous materials would comply with the established regulations and would ensure that cumulative impacts are below the level of significance.

3.6.5 Mitigation Measures

Tier I

Measure Hazards-1

To reduce surface water quality impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. A Spill Prevention Control and Countermeasures Plan shall be developed as a part of these requirements to address the handling of petroleum or other hazardous materials during refueling, operations and maintenance and other construction-related activities. The agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Measure Hazards-2

To avoid exposure to asbestos-containing materials and lead-based paints during demolition, construction, and remediation activities, the County of Los Angeles and the Office of Statewide Health Planning and Development shall require that all such materials and wastes be identified and an Operations and Maintenance Plan developed prior to the issuance of demolition permits for each structure constructed prior to 1979. The Operations and Maintenance Plan shall ensure compliance with all applicable federal, state, and local requirements and specify all work to be done, including lead and asbestos surveys of structures to be demolished, proper handling and storage of lubricants and fuels for construction equipment, and methods for remediation of asbestos-containing materials and lead-based paints, if necessary. The Operations and Maintenance Plan shall be submitted to the County of Los Angeles Department of Health Services for review and approval prior to initiation of construction and demolition activities for the Multi-Service Ambulatory Care Center building, emergency room, storage building, and cooling towers. The Operations and Maintenance Plan shall, as appropriate and necessary, conform to the requirements of the Los Angeles County Department of Health Services (Local Enforcement Agency), South Coast Air Quality Management District, the Los Angeles Regional Water Quality Control Board, and the Department of Toxic Substances Control.

Compliance with the Operations and Maintenance Plan shall be monitored by the County of Los Angeles Regional Planning Department throughout construction and demolition.

To reduce impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. These agencies shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Measure Hazards-3

Prior to the issuance of grading permits for development, the County of Los Angeles shall ensure that a Soil Management Plan is prepared for the project site and that the Office of Statewide Health Planning and Development reviews the grading plans to ensure that the construction contractor is required to stop work and notify the Certified Unified Program Agency of the unanticipated encounter of underground storage tanks during grading activities. In the event that any leaking underground storage tanks are located or encountered, the County of Los Angeles Department of Public Works shall be notified and the underground storage tank shall be remediated in accordance with County of Los Angeles guidelines and consistent with specifications of the Department of Toxic Substances Control and other relevant standards. The County of Los Angeles Fire Department Health Hazardous Materials Division shall be notified of all other contaminated soils encountered during construction related site activities.

Measure Hazards-4

To avoid exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon–contaminated soils during routine transport and disposal for both the construction phase and operational phase of the proposed project, the County of Los Angeles shall require that the construction contractor store, use, and transport all hazardous materials in compliance with all relevant regulations and guidelines. The routine transport of hazardous materials to and from the Martin Luther King, Jr. Medical Center Campus during construction and operation of the elements of the project shall be accomplished via Wilmington Avenue, Compton Avenue, and 119th Street. Compliance shall be determined by monitoring by regulatory agencies. Transport, storage, and handling of construction-related hazardous materials shall be consistent with the guidelines provided by the California Department of Transportation, Los Angeles Regional Water Quality Control Board, the South Coast Air Quality Management District, and the Certified Unified Program Agency. Each agency shall regulate and enforce, through permitting and record keeping, the monitoring and enforcement of this mitigation measure.

Measure Hazards-5

At least 30 days prior to approval of Tier I final plans and specifications for development, the Office of Statewide Health Planning and Development shall review and provide comments on the plans and specifications to ensure compliance with all requirements of the Department of Toxic Substances Control and to verify that the site remains unlisted on the Hazardous Materials and Substance Sites List

maintained by the California Environmental Protection Agency, Department of Toxic Substances Control.

Tier II

Measure Hazards-1

To reduce surface water quality impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. A Spill Prevention Control and Countermeasures Plan shall be developed as a part of these requirements to address the handling of petroleum or other hazardous materials during refueling, operations and maintenance and other construction related activities. The agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Measure Hazards-2

To avoid exposure to asbestos-containing materials and lead-based paints during demolition, construction, and remediation activities, the County of Los Angeles and the Office of Statewide Health Planning and Development shall require that all such materials and wastes be identified and an Operations and Maintenance Plan developed prior to the issuance of demolition permits for each structure constructed prior to 1979. The Operations and Maintenance Plan shall ensure compliance with all applicable federal, state, and local requirements and specify all work to be done, including lead and asbestos surveys of structures to be demolished, proper handling and storage of lubricants and fuels for construction equipment, and methods for remediation of asbestos-containing materials and lead-based paints, if necessary. The Operations and Maintenance Plan shall be submitted to the County of Los Angeles Department of Health Services for review and approval prior to initiation of construction and demolition activities for the Multi-Service Ambulatory Care Center building, emergency room, storage building , and the cooling towers. The Operations and Maintenance Plan shall, as appropriate and necessary, conform to the requirements of the Los Angeles County Department of Health Services (Local Enforcement Agency), South Coast Air Quality Management District, the Los Angeles Regional Water Quality Control Board, and the Department of Toxic Substances Control. Compliance with the Operations and Maintenance Plan shall be monitored by the County of Los Angeles Regional Planning Department throughout construction and demolition.

To reduce impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. These agencies shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Measure Hazards-3

Prior to the issuance of grading permits for development, the County of Los Angeles shall ensure that a Soil Management Plan is prepared for the proposed project site and that the Office of Statewide Health Planning and Development reviews the grading plans to ensure that the construction contractor is required to stop work and notify the Certified Unified Program Agency of the unanticipated encounter of underground storage tanks during grading activities. In the event that any leaking underground storage tanks are located or encountered, the County of Los Angeles Department of Public Works shall be notified and the underground storage tank shall be remediated in accordance with County of Los Angeles guidelines and consistent with specifications of the Department of Toxic Substances Control and other relevant standards. The County of Los Angeles Fire Department Health Hazardous Materials Division shall be notified of all other contaminated soils encountered during construction-related site activities.

Measure Hazards-4

To avoid exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon–contaminated soils during routine transport and disposal for both the construction phase and operational phase of the project, the County of Los Angeles shall require that the construction contractor store, use, and transport all hazardous materials in compliance with all relevant regulations and guidelines. The routine transport of hazardous materials to and from the Martin Luther King, Jr. Medical Center Campus during construction and operation of the elements of the project shall be accomplished via Wilmington Avenue, Compton Avenue, and 119th Street. Compliance shall be determined by monitoring by regulatory agencies. Transport, storage, and handling of construction-related hazardous materials shall be consistent with the guidelines provided by the California Department of Transportation, Los Angeles Regional Water Quality Control Board, the South Coast Air Quality Management District, and the Certified Unified Program Agency. Each agency shall regulate and enforce, through permitting and record keeping, the monitoring and enforcement of this mitigation measure.

Measure Hazards-5

At least 30 days prior to approval of Tier II final plans and specifications for development, the Office of Statewide Health Planning and Development shall review and provide comments on the plans and specifications to ensure compliance with all requirements of the Department of Toxic Substances Control and in order to verify that the site remains unlisted on the Hazardous Materials and Substance Sites List maintained by the California Environmental Protection Agency, Department of Toxic Substances Control.

3.6.6 Level of Significance after Mitigation

Tier I

Implementation of mitigation measure Hazards-1 and Hazards-2 for Tier I would reduce significant impacts related to the exposure of hazards and hazardous materials to below the level of significance.

Implementation of mitigation measure Hazards-3 for Tier I would reduce significant impacts related to USTs below the level of significance.

Implementation of mitigation measure Hazards-4 for Tier I would reduce significant impacts related to exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon–contaminated soils during routine transport and disposal for both the construction phase and operational phase of the proposed project to below the level of significance.

Implementation of mitigation measure Hazards-5 for Tier I would reduce significant impacts related to hazards and hazardous materials below the level of significance.

Tier II

Implementation of mitigation measure Hazards-1 and Hazards-2 for Tier II would reduce significant impacts related to the exposure of hazards and hazardous materials to below the level of significance.

Implementation of mitigation measure Hazards-3 for Tier II would reduce significant impacts related to UST below the level of significance.

Implementation of mitigation measure Hazards-4 for Tier II would reduce significant impacts related to exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon–contaminated soils during routine transport and disposal for both the construction phase and operational phase of the proposed project to below the level of significance.

Implementation of mitigation measure Hazards-5 for Tier II would reduce significant impacts related to hazards and hazardous materials below the level of significance.

3.7 HYDROLOGY AND WATER QUALITY

As a result of the Initial Study, the County of Los Angeles determined that the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in impacts to hydrology and water quality.[1] Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts to hydrology and water quality.

The analysis of hydrology and water quality consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the proposed project area, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential for impacts to hydrology and water quality are subject to the methodologies and information provided by the County of Los Angeles (County) General Plan;[2] the County Department of Public Works Hydrology Manual;[3] Section 15063 of the State of California Environmental Quality Act Guidelines;[4] the National Pollution Discharge Elimination System (NPDES);[5] National Flood Insurance Program Flood Insurance Rate Maps for the County;[6] the California Storm Water Best Management Practice Handbook;[7] the U.S. Geological Survey (USGS) 7.5-minute series South Gate, California topographic quadrangle;[8] the State of California Regional Water Quality Control Plan; and the Los Angeles Regional Water Quality Control Board (LA-RWQCB).[9]

3.7.1 Regulatory Framework

This regulatory framework identifies the federal, state, and local statutes and policies that relate to hydrology and water quality and that must be considered by the County during the decision-making process for projects that involve the potential to result in significant impacts related to hydrology and water quality.

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[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

[2] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[3] County of Los Angeles Department of Public Works. *2006 Hydrology Manual*. Available at: http://ladpw.org/wrd/publications

[4] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[5] U.S. Environmental Protection Agency. 2009. National Pollution Discharge Elimination System. Available at: http://cfpub.epa.gov/npdes/

[6] Federal Emergency Management Agency. Flood Maps. Available at: http://www.fema.gov/hazard/map/index.shtm

[7] California Stormwater Quality Association. 1993. *California Stormwater Best Management Practice Handbook*. Available at: http://www.cabmphandbooks.com

[8] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[9] California Regional Water Quality Control Board, Los Angeles Regional Water Quality Control Board. 2007. *Water Quality Control Plan (Basin Plan) for the Los Angeles Regional Water Quality Control Board (4)*. Los Angeles, CA.

Federal

Section 401 of the Clean Water Act of 1972

The federal Clean Water Act (CWA) of 1972 sets national goals and policies to eliminate discharge of water pollutants into navigable waters and to achieve a water-quality level that will protect fish, shellfish, and wildlife while providing for recreation in and on the water whenever possible.[10] The CWA regulates point-source and non-point-source discharges to receiving waters with the National Pollutant Discharge Elimination System (NPDES) program. The CWA provides for delegating certain responsibilities for water-quality control and planning to the states. The State of California (State) has been authorized by the U.S. Environmental Protection Agency (USEPA) to administer and enforce portions of the CWA, including the NPDES program. The State issues NPDES permits through the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs). The proposed project is regulated by the Los Angeles RWQCB.

In 1987, the CWA was amended to state that the discharge of pollutants to waters of the United States from storm water is effectively prohibited, unless the discharge is in compliance with an NPDES permit. The 1987 amendments to the CWA added Section 402(p) and established a framework for regulating industrial, municipal, and construction storm water discharges under the NPDES program. The 1987 amendment was developed from the awareness that storm water runoff, a non-point-source discharge, is a significant source of water pollution. In 1990, the USEPA published final regulations that established application requirements to determine when industrial, municipal, and construction activities require an NPDES permit.

On December 13, 2001, the Los Angeles RWQCB, adopted Order No. 01-182. This order is the NPDES permit (NPDES CAS004001) for municipal storm water and urban runoff discharges within the County of Los Angeles.

As adopted in December 2001, the requirements of Order No. 01-182 (the "permit") covers 84 cities and the unincorporated areas of the County of Los Angeles. Under the permit, the Los Angeles County Flood Control District is designated as the principal permittee; the County of Los Angeles along with the 84 incorporated cities are designated as co-permittees. The principal permittee coordinates and facilitates activities necessary to comply with the requirements of the permit, but is not responsible for ensuring compliance of any of the permittees.

In compliance with the permit, the permittees have implemented a Storm Water Quality Management Plan (SQMP), with the ultimate goal of accomplishing the requirements of the permit and reducing the amount of pollutants in storm water and urban runoff. The SQMP is divided into six separate programs, as outlined in the permit. These programs are Public Information and Participation, Industrial/Commercial Facilities, Development Planning, Development Construction, Public Agency Activities, and Illicit Connection / Illicit Discharge. Each permittee is required by the permit to have implemented these programs by February 1, 2002.

General Construction Activity Storm Water Discharges

Storm water discharges that are composed entirely of runoff from qualifying construction activities may be eligible to be regulated under the General Construction Activity Storm Water Permit issued by the SWRCB rather than an individual NPDES permit issued by the appropriate RWQCB. Construction

[10] *United States Code*. Title 33, Section 1341: "Certification."

activities that qualify include clearing, grading, excavation, reconstruction, and dredge-and-fill activities that result in the disturbance of greater than 1 acre of total land area. The proposed project would be required to conform to the Standard Urban Stormwater Management Plan (SUSMP) as part of compliance with the NPDES General Construction Activity Storm Water Permit (amended on September 2, 2009, Order No. 2009-0009-DWQ) to reduce water quality impacts to the maximum extent practicable. A Stormwater Pollution Prevention Plan (SWPPP) is required by the construction general permit and describes the construction site operators activities to prevent stormwater contamination, control sedimentation and erosion, and comply with the requirements of the Clean Water Act. A SUSMP is a report that includes one or more site maps, an identification of post-construction activities that could cause pollutants to enter the storm water and a description of measures or best management practices (BMPs) to control these pollutants to the maximum extent practicable. A BMP is defined by the California Stormwater Quality Association (CASQA) formerly known as the Storm Water Quality Task Force, as any program, technology, process, citing criteria, operating method, measure, or device that controls, prevents, removes, or reduces storm water pollution.

Executive Order 11988

The objective of Executive Order 11988, dated May 24, 1977, is the avoidance of, to the extent possible, long- and short-term adverse impacts associated with the occupancy and modification of the base floodplain (100-year floodplain) and the avoidance of direct and indirect support of development in the base floodplain wherever there is a practicable alternative. Under the Executive Order, the U.S. Army Corps of Engineers (Corps) must provide leadership and take action to:

- Avoid development in the base floodplain unless it is the only practicable alternative
- Reduce the hazard and risk associated with floods
- Minimize the impact of floods to human safety, health, and welfare
- Restore and preserve the natural and beneficial values of the base floodplain

The proposed project would be subject to Executive Order 11988 if it would result in adverse impacts to the 100-year floodplain.

Regional

Water Quality Control Plan for the Los Angeles Region

The federal Clean Water Act is administered and enforced by the State Water Resources Control Board, which develops regulations to implement water-quality control programs mandated at the federal and state levels.

The Los Angeles RWQCB has prepared a Water Quality Control Plan for the Los Angeles Region (Basin Plan), which includes the Coastal Watersheds of Los Angeles and Ventura Counties. The first essentially complete Basin Plan, which was established under the requirements of California's 1969 Porter-Cologne Water Quality Control Act [Section 13000 (Water Quality) et seq. of the California Water Code], was adopted in 1975 and revised in 1984. The most recent version of the Basin Plan was adopted in 1994.[11]

[11] Regional Water Quality Board, Los Angeles Region. 13 June 1994 (Triennial Review completed 2008-2010). *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*. Monterey Park, CA.

The Basin Plan assigned beneficial uses to surface and groundwater such as municipal water supply and water-contact recreation to all waters in the basin. It also set water-quality objectives, subject to approval by the EPA, intended to protect designated beneficial uses. These objectives apply to specific parameters (numeric objectives) and general characteristics of the water body (narrative objectives). An example of a narrative objective is the requirement that all waters must remain free of toxic substances in concentrations producing detrimental effects on aquatic organisms. Numeric objectives specify concentrations of pollutants that are not to be exceeded in ambient waters of the basin.

Local

County of Los Angeles General Plan

The County of Los Angeles Board of Supervisors adopted the Conservation, Open Space and Recreation element as a component of the County of Los Angeles General Plan;[12] the provisions of the element were updated, revised, combined, and included in the Streamlined County of Los Angeles General Plan (General Plan).[13] The Conservation, Open Space and Recreation element addresses policies directed for open space-related resources of Los Angeles County.

The General Plan includes goals to conserve water and protect water quality. There are two policies supporting this goal relevant to the proposed project:[14]

1. Protect groundwater recharge and watershed areas, conserve storm and reclaimed water, and promote water conservation programs
2. Encourage the maintenance of landscaped areas and pollution-tolerant plants in urban areas. Integrate landscape and open space into housing, commercial, and industrial developments, especially in urban revitalization areas. Use drought-resistant vegetation.

The General Plan includes a hazards goal to reduce the risk of life and property from seismic occurrence, flooding, erosion, wildland fires, and landslides. There is one policy supporting this goal relevant to the proposed project:[15]

- Restrict urban development on flood prone areas, and thus avoid major new flood control works.

The "Flood Protection Policy Map" of the County of Los Angeles General Plan must be taken into consideration in the project planning process.[16,17]

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[12] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

[13] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA. and County of Los Angeles Department of Regional Planning. January 1993. *Streamlined County of Los Angeles General Plan*. Los Angeles, CA.

[14] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA. and County of Los Angeles Department of Regional Planning. January 1993. *Streamlined County of Los Angeles General Plan*. Los Angeles, CA.

[15] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA. and County of Los Angeles Department of Regional Planning. January 1993. *Streamlined County of Los Angeles General Plan*. Los Angeles, CA.

[16] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

Los Angeles County Hydrology Manual

The County of Los Angeles Hydrology Manual provides information relevant to conducting hydrologic study within the County of Los Angeles.[18] This manual provides examples and methods to explain the steps involved in converting rainfall to runoff flow rates and volumes using Los Angeles County Department of Public Works' standards.

Additionally, this manual contains procedures and standards developed and revised by the Water Resources Division of the County Department of Public Works based on historic rainfall and runoff data collected within the County.[19] The techniques in this manual apply to the design of local storm drains, retention and detention basins, pump stations, and major channel projects. The techniques also apply to storm drain deficiency and flood hazard evaluations. Low flow hydrology methods related to water quality standards are also discussed.[20]

Municipal Code

On December 13, 2001, the LA-RWQCB, adopted Order No. 01-182. This order is the NPDES permit (NPDES CAS00400, amended September 14, 2006, August 9, 2007, and December 10, 2009) for municipal storm water and urban runoff discharges within the County of Los Angeles.

As adopted in December 2001, the requirements of Order No. 01-182 (the "permit") covers 84 cities and the unincorporated areas of the County of Los Angeles (with the exception of the portion of County of Los Angeles in the Antelope Valley), covered areas include the cities of Lancaster and Palmdale, as well as the cites of Long Beach and Avalon. Under the permit, the County of Los Angeles Flood Control District is designated as the principal permittee; the County of Los Angeles along with the 84 incorporated cities are designated as permittees. The principal permittee coordinates and facilitates activities necessary to comply with the requirements of the permit, but is not responsible for ensuring compliance of any of the permittees.

The County Stormwater Ordinance addresses provisions that apply to the discharge, deposit, or disposal of any stormwater and/or runoff to the storm drain system and/or receiving waters within any unincorporated area covered by the NPDES municipal stormwater permit. The County Municipal Stormwater NPDES Permit contains a requirement for permittees to develop and implement programs for stormwater management within the County.

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[17] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA. and County of Los Angeles Department of Regional Planning. January 1993. *Streamlined County of Los Angeles General Plan*. Los Angeles, CA.

[18] County of Los Angeles, Department of Public Works. January 2006. *County of Los Angeles Hydrology Manual*. Available at: http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf

[19] County of Los Angeles, Department of Public Works. January 2006. *County of Los Angeles Hydrology Manual*. Available at: http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf

[20] County of Los Angeles, Department of Public Works. January 2006. *County of Los Angeles Hydrology Manual*. Available at: http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf

In compliance with the permit, the permittees have implemented a storm water quality management plan (SWQMP), with the ultimate goals of accomplishing the requirements of the permit and reducing the amount of pollutants in storm water and urban runoff. The SWQMP is divided into six separate programs, as outlined in the permit. These programs are 1) Public Information and Participation, 2) Industrial/Commercial Facilities, 3) Development Planning, 4) Development Construction, 5) Public Agency Activities, and 6) Illicit Connection/Illicit Discharge. Each permittee is required by the permit to have implemented these programs by February 1, 2002.

General Construction Activity Storm Water Discharges

Storm water discharges that are composed entirely of runoff from qualifying construction activities may be eligible to be regulated under the General Construction Activity Storm Water Permit issued by the SWRCB rather than an individual NPDES permit issued by the appropriate RWQCB. Construction activities that qualify include clearing, grading, excavation, reconstruction, and dredge-and-fill activities that result in the disturbance of greater than one acre of total land area. The proposed project would be required to conform to the Stormwater Pollution Prevention Plan (SWPPP) and Standard Urban Stormwater Management Plan (SUSMP) as part of compliance with the NPDES General Construction Activity Storm Water Permit to reduce both the construction and operational water quality impacts to the maximum extent practicable. The SWPPP and SUSMP are construction and operational plans, respectively that include one or more site maps, an identification of construction activities that could cause pollutants to enter the storm water, and a description of measures or best management practices (BMPs) to prevent, mitigated, or control these pollutants to the maximum extent practicable. A BMP is defined by the Stormwater Quality Task Force as any program, technology, process, siting criteria, operating method, measure, or device that controls, prevents, removes, or reduces storm water pollution.

3.7.2 Existing Conditions

The proposed project is located within the Los Angeles Regional Water Quality Control Board authority. Therefore, the proposed project area's existing conditions were verified under the State of California RWQCB Basin Plans for the Los Angeles region.

The implementation of the proposed project would affect the existing 38-acre Martin Luther King, Jr. Medical Center Campus located at 12021 Wilmington Avenue in the unincorporated area of Willowbrook in the County of Los Angeles, California. The proposed project is located within the Central Basin Municipal Water District, and the proposed project site and surrounding urbanized area are served by storm drain collection infrastructure that is a part of the Los Angeles storm drain system.

The proposed project site appears on the USGS 7.5-minute series South Gate topographic quadrangle.[21] The elevations at the proposed project site range from 86 feet about mean sea level (MSL) to 88 feet above MSL. The topography of the site can be generally characterized as flat. There are no significant topographic features at the project site.

[21] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

3.7.2.1 Drainage

The Los Angeles Region includes all coastal drainage flow of five coastal islands in addition to the flow into the Pacific Ocean between Rincon Point and the eastern Los Angeles County line. Compton Creek, which flows into the Los Angeles River just south of the 91 Freeway, is the nearest hydrologic feature and is located approximately 500 yards (0.3 mile) southwest of the MLK Campus.

The proposed project is a part the existing Los Angeles storm drain system. The Los Angeles County Department of Public Works has implemented measures to initiate storm water pollution reduction programs throughout the County.[22] The proposed project is located on a previously disturbed site

3.7.2.2 Surface Water Quality

The proposed project is located on an existing and previously disturbed site. The existing site consists largely of impervious surfaces, including buildings, parking lots, and other paved surfaces. There are some landscaped areas and other open spaces on the campus that serve as pervious surfaces. There are no natural drainage features on the proposed project site, although it is a part of the existing Los Angeles storm drain system.

3.7.2.3 Groundwater

The proposed project site area is located within the Central Coast Groundwater Basin (Central Basin) which has a storage capacity of 13,800,000 acre-feet. The Park Water Company, Central Division (PWC) provides potable water supplies for the Compton West service area that includes the proposed project area. Groundwater currently comprises approximately 11 percent of PWC's water supply and of its three groundwater supply wells located in its Compton West service area, one is active and two are on standby.[23]

The groundwater at the existing site has been encountered at 38 to 52 feet below ground surface.[24] The existing use of the proposed project site does not serve as or influence the local groundwater basin. The site also does not serve as a groundwater recharge site. Screening level analytical data from a preliminary investigation of subsurface soil borings at the proposed project site indicated that there were no contaminants of concern in samples collected of both soil and groundwater that resulted from the proposed project site.[25]

3.7.2.4 Floodways and 100-Year Flood Zone

The proposed project site is located on the existing 38-acre Martin Luther King, Jr. Medical Center Campus in Los Angeles County, which is not located within a 100-year or 500-year flood zone.[26] The existing campus does not have structures that are located within a 100-year flood hazard area.

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[22] County of Los Angeles Department of Public Works. Accessed 2 October 2009. "Stormwater Pollution Prevention Home." Available at: http://ladpw.org/PRG/StormWater/Page_03.cfm

[23] RMT. 2010. *Preliminary Water Supply Assessment, Martin Luther King Medical Center Campus, Redevelopment Project, 2010*. Los Angeles, CA.

[24] URS Corporation. 14 May 2009. *Geotechnical Investigation*. Los Angeles, CA.

[25] URS Corporation. 10 June 2009. *Report Limited Environmental Subsurface Investigation for the Proposed MACC Building and ED/Ancillary Building Martin Luther King, Jr. Multi-Service Ambulatory Care Center*. Los Angeles, CA.

[26] Federal Emergency Management Agency. Flood Maps. Available at: http://www.fema.gov/hazard/map/index.shtm

The Los Angeles River Watershed currently redirects flood water to reduce the impacts of major flood events in the region. The watershed encompasses and is shaped by the path of the Los Angeles River and ultimately follows into San Pedro Bay.[27] The Los Angeles River is channelized to control the runoff and reduce flood-related impacts in the region. Each of the major flood control channels offer the proposed project site protection from flooding during a significant rain event, specifically during potential flood activity.

3.7.2.5 Seiche, Tsunamis, and Mudflows

Seiches and tsunamis are the result of tectonic activity, such as an earthquake. A seiche is an oscillation of the surface of a landlocked body of water that can create a hazard to persons and structures on and in the vicinity of the water. A tsunami is a long-period, high-velocity tidal surge that can result in a series of very low (trough) and high (peak) sea levels with the potential to inundate areas up to several miles from the coast, creating hazards to people or structures from loss, injury, or death. Most of the hazards created by a tsunami come when a trough follows the peak resulting in a rush of sea water back into the ocean. A mudflow is a moving mass of soil made fluid by a loss of shear strength, generally as a result of saturation from rain or melting snow.

The proposed project site is located approximately 10 miles east from the Pacific Ocean, at elevations between approximately 86 and 88 feet above MSL. There are no slopes on-site or in the surrounding vicinity.

3.7.3 Significance Thresholds

The potential for the proposed project to result in impacts to hydrology and water quality was analyzed in relation to the questions contained in Appendix G of the State California Environmental Quality Act (CEQA) Guidelines. The proposed project would normally be considered to have a significant impact to hydrology and water quality if the proposed project would:

- Violate any water quality standards or waste discharge requirements
- Substantially deplete groundwater supplies or interfere with groundwater recharge leading to a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of preexisting nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)
- Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation either on site or off site
- Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or substantial increase in the rate or amount of surface runoff in a manner that would result in flooding either on site or off site

[27] County of Los Angeles Department of Public Works. 2008. *Los Angeles River Watershed.* Available at: http://ladpw.org/wmd/watershed/LA/

- Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff

- Otherwise substantially degrade water quality

- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map

- Place structures within a 100-year flood hazard area that would impede or redirect flood flows

- Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam

- Result in inundation by seiche, tsunami, or mudflow

3.7.4 Impact Analysis

3.7.4.1 Water Quality Standards

Tier I

Tier I of the proposed project would be expected to result in less than significant impacts to hydrology and water quality in relation to violating any water quality standards or waste discharge requirements. The proposed project would entail both construction and operational elements in Tier I, would be expected to involve ground-disturbing activities. The construction of the proposed project may contribute to erosion, sediment-laden runoff, discharge of non-storm water runoff from the proposed project site, or other water quality–related events that could violate water quality standards or waste discharge requirements. In addition, Tier I of the proposed project would include construction-related activities and operational activities that would be expected to result in changes from current hydrology-related activities at the proposed project site.

Tier I of the proposed project would implement sustainable measures, Leadership in Energy and Environmental Design (LEED) elements, and best management practices (BMPs) to reduce or eliminate non-storm discharges to the storm water system. These requirements meet the water quality standards set forth by the responsible agencies, and address storm water runoff quantity and flow rate, suspended solids (primarily from erosion), and contaminants such as phosphorus and hydrocarbons. BMPs would be incorporated in accordance with the NPDES permit issued to the County by the LA-RWQCB, the LADPW SUSMP, and the County General Plan. Therefore, Tier I would be expected to result in less than significant impacts to hydrology and water quality in relation to violating any water quality standards or waste discharge requirements.

Tier II

Tier II of the proposed project would be expected to result in less than significant impacts to hydrology and water quality in relation to violating any water quality standards or waste discharge requirements. The proposed project would entail both construction and operational elements in Tier II, which would be expected to involve ground-disturbing activities. As in Tier I, the construction of the Tier II may contribute to erosion, sediment-laden runoff, discharge of non-storm water runoff from the proposed

project site, or other water quality–related events that could violate water quality standards or waste discharge requirements. In addition, Tier II of the proposed project would include construction-related activities and operational activities that would be expected to result in changes from current hydrology-related activities at the proposed project site.

Tier II of the proposed project would implement sustainable measures, LEED elements, and BMPs to reduce or eliminate non-storm discharges to the storm water system. These requirements meet the water quality standards set forth by the responsible agencies, and address storm water runoff quantity and flow rate, suspended solids (primarily from erosion), and contaminants such as phosphorus and hydrocarbons. BMPs would be incorporated in accordance with the NPDES permit issued to the County by the LA-RWQCB, the LADPW SUSMP, and the County General Plan. Therefore, Tier II would be expected to result in less than significant impacts to hydrology and water quality in relation to violating any water quality standards or waste discharge requirements.

3.7.4.2 Surface Water Quality

Direct and Indirect Impacts

Tier I

Tier I of the proposed project would have the potential to result in significant impacts to hydrology and water quality in relation to surface water quality, therefore requiring the consideration of mitigation measures. Tier I of the proposed project would be expected to generate wastewater from kitchen uses, restrooms, landscape, irrigation, and would entail ground-disturbing activities during construction elements. The proposed project would have the potential to violate water quality standards due to indirect impacts from the runoff of sediment-laden polluted stormwater or wastewater into the Los Angeles County storm drain system, subsequently causing discharges of pollutants of concern into receiving waters of the storm drain system. It is anticipated that Tier I of the proposed project would result in an approximately 14-percent increase in impervious surfaces, which would be expected to increase runoff from the proposed project site (Appendix G, *Stormwater Analysis for Tier I Development*).[28] This increase in stormwater runoff would be reduced at the proposed project site by project design features such as a combination of on-site storage detention and infiltration by constructing subsurface stormwater collection chambers under the parking lots in the areas designated in a soil infiltration report as the best infiltration locations (Appendix G).[29]

As with most projects that contain construction-related activities, the construction phase of Tier I would also require the use of gasoline, diesel fuel, and lubricants for fueling project vehicles and paints, adhesives, and solvents. Accidental spills of petroleum products and other hazardous substances during project construction, refueling and operation and maintenance activities could potentially enter the storm drain system if not properly cleaned up and removed from the spill site. Additionally, other construction-related activities have the potential to result in the release of wastewater, and other pollutants that could impact the surface water at the proposed Tier I project site. However, the plans and specifications for the proposed Tier I project would include a requirement for the construction contractor to comply with all provisions of the NPDES permit issued by the LA-RWQCB, to the County of Los Angeles, as they relate to avoiding impacts from stormwater runoff during construction; the County would be responsible for ensuring that these practices are enforced. Tier I of the proposed project would be required to incorporate BMPs during construction and operation. BMPs are

[28] Moffatt and Nichol. July 2010. *Stormwater Analysis for Tier I Development*. Long Beach, CA.

[29] Moffatt and Nichol. July 2010. *Stormwater Analysis for Tier I Development*. Long Beach, CA.

consistent with guidelines provided in the *California Storm Water Best Management Practices Handbook for Construction Activities* and in the Los Angeles County Storm Water Management Program for substantiated erosion or siltation.

Mitigation measures to ensure the implementation of BMPs, SWQMP, LEED and sustainable measures to reduce potentially significant construction-related impacts related to water quality will reduce this impact to below the level of significance.

It is not anticipated that operation of Tier I would result in impacts related to water quality, as the proposed project would be designed in compliance with County standards and BMPs, LEED, and sustainable measures such as appropriate design of parking lot catch basins and biofiltration of stormwater runoff. Ongoing maintenance of project landscaping may require occasional use of pesticides and herbicides, which would be utilized in accordance with state regulations and usage instructions, thereby avoiding any substantive adverse impact. Operation of Tier I would, therefore, not result in significant impacts to hydrology and water quality.

Tier II

Tier II would have the potential to result in significant impacts to hydrology and water quality in relation to surface water quality, therefore requiring the consideration of mitigation measures. As in Tier I, the proposed Tier II project would be expected to generate wastewater from kitchen uses, restrooms, landscape, irrigation and would entail ground-disturbing activities during construction elements that would have the potential to violate water quality standards due to indirect impacts from the runoff of sediment-laden polluted stormwater into the Los Angeles County storm drain system, subsequently causing discharges of pollutants of concern into receiving waters of the storm drain system.

As with most projects that contain construction-related activities, the construction phase of Tier II would also require the use of gasoline, diesel fuel, and lubricants for fueling project vehicles and paints, adhesives, and solvents. Accidental spills of petroleum products and other hazardous substances during project construction, refueling and operation and maintenance activities could potentially enter the storm drain system if not properly cleaned up and removed from the spill site. Additionally, other construction-related activities have the potential to result in the release of wastewater, and other pollutants that could impact the surface water at the proposed Tier II project site.

The plans and specifications for Tier II would include a requirement for the construction contractor to comply with all provisions of the NPDES permit issued by the LA-RWQCB, to the County of Los Angeles, as they relate to avoiding impacts from stormwater runoff during construction; the County would be responsible for ensuring that these practices are enforced. Tier II of the proposed project would be required to incorporate BMPs during construction and operation. BMPs are consistent with guidelines provided in the *California Storm Water Best Management Practices Handbook for Construction Activities* and in the Los Angeles County Storm Water Management Program for substantiated erosion or siltation.

Mitigation measures to ensure the implementation of BMPs, SWQMP, LEED, and sustainable measures to reduce potentially significant construction-related impacts related to water quality would reduce this impact to below the level of significance.

It is anticipated that operation of Tier II would result in impacts related to water quality. It is anticipated that Tier II of the proposed project has the potential to result in a significant increase in impervious

surfaces, which would be expected to increase runoff from the proposed project site (Appendix G).[30] This increase in storm water runoff would be reduced at the proposed project site by project design features. These features include items such as a combination of on-site storage detention and infiltration facilities, in the form of subsurface stormwater collection chambers under the parking lots in designated areas in a soil infiltration report as the best infiltration locations (Appendix G).[31] However, Tier II of the proposed project has the potential to result in significant impacts related to surface water quality during operation due to the size of the anticipated development and the various uses that might contribute to additional runoff or that may indirectly result from the additional development on the campus, therefore requiring implementation of mitigation measures. The proposed project would be designed in compliance with County standards and BMPs, LEED (for all County buildings greater than 10,000 square feet), and sustainable measures such as appropriate design of parking lot catch basins and biofiltration of storm water runoff to help reduce surface water quality. Ongoing maintenance of project landscaping may require occasional use of pesticides and herbicides, which would be utilized in accordance with state regulations and usage instructions, thereby avoiding any substantive adverse impact. Operation of Tier II of the proposed project would result in significant impacts to hydrology and water quality that would be reduced to below the level of significance with the incorporation of mitigation measures.

3.7.4.3 Groundwater

Tier I

Tier I of the proposed project would be expected to result in significant impacts to hydrology and water quality in relation to groundwater that would be reduced to below the level of significance with the incorporation of mitigation measures. The proposed project site does not serve as a designated groundwater recharge area; however, project design elements would be expected to reduce the potential for polluted materials to infiltrate into groundwater. The proposed project is located within the Central Coast Groundwater Basin and groundwater has been determined to occur at approximately 38 to 52 feet below ground surface.[32] The construction phase of the project has the potential to encounter groundwater during excavation activities, which are expected to include excavation to approximately 45 feet below the surface. Where groundwater is encountered, dewatering will be required. However, this effect on groundwater would occur only during the proposed project construction and would have a minimal effect on local groundwater levels in the area.

Tier I of the proposed project development would be consistent with the existing uses at the site. Although development of the new buildings and site improvements on the campus would be expected to slightly increase the impervious surface area of the proposed project site, resulting in a site predominantly covered in impervious surfaces, which may decrease the amount of groundwater recharge; the proposed project site would be anticipated to maintain at least 10 percent of the campus in open space. Additionally, the proposed project site for Tier I is not designated as a current recharge facility for a groundwater basin by the Metropolitan Water District of Southern California.[33] Tier I would not deplete ground water supplies, interfere with groundwater recharge, or utilize groundwater

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[30] Moffatt and Nichol. July 2010. *Stormwater Analysis for Tier I Development*. Long Beach, CA.

[31] Moffatt and Nichol. July 2010. *Stormwater Analysis for Tier I Development*. Long Beach, CA.

[32] URS. 14 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed ED/Ancillary Building and Central Plant Expansion, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[33] Metropolitan Water District of Southern California. November 2005. *Regional Urban Water Management Plan*. Los Angeles, CA.

supplies. While the impervious surfaces on the campus would prevent some water infiltration at the campus, the proposed project would include sustainable LEED elements to ensure that the proposed project does not significantly impact the groundwater supplies or recharge at the proposed project site. Therefore, implementation of Tier I has the potential to result in significant impacts to hydrology and water quality in relation to groundwater, therefore requiring the consideration of mitigation measures.

Tier II

Tier II of the proposed project would be expected to result in significant impacts to hydrology and water quality in relation to groundwater that would be reduced to below the level of significance with the incorporation of mitigation measures. The proposed project site does not serve as a designated groundwater recharge area; however, project design elements would be expected to reduce the potential for polluted materials to infiltrate into groundwater. The proposed project is located within the Central Coast Groundwater Basin and groundwater has been determined to occur at approximately 38 to 52 feet below ground surface.[34] As in Tier I, the construction phase of Tier II of the project has the potential to encounter groundwater during excavation activities, which are expected to include excavation to approximately 45 feet below the surface where excavation depths exceed the depth of groundwater. Where this occurs, dewatering would be required. However, this effect on groundwater would occur only during the proposed project construction and would have a minimal effect on local groundwater levels in the area.

The proposed Tier II project development would be consistent with the existing uses at the site. As with Tier I, Tier II would increase the impervious surface area of the proposed project site, resulting in a site predominantly covered in impervious surfaces, which may decrease the amount of ground water recharge; the proposed project site would be anticipated to maintain at least 10 percent of the campus in open space. Additionally, the proposed project site is not designated as a current recharge facility for a groundwater basin by the Metropolitan Water District of Southern California.[35] Tier II would not deplete ground water supplies, interfere with groundwater recharge, or utilize groundwater supplies. While the impervious surfaces on the campus would prevent some water infiltration at the campus, the proposed project will include sustainable Leadership in Energy and Environmental Design (LEED) elements to ensure that the Tier II does not significantly impact the groundwater supplies or recharge at the proposed project site. Therefore, implementation of Tier II has the potential to result in significant impacts to hydrology and water quality in relation to groundwater, therefore requiring the consideration of mitigation measures

3.7.4.4 Drainage

Tier I

Tier I of the proposed project would result in less than significant impacts to hydrology and water quality in relation to drainage. The proposed project would not substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation either on or off site. The materials most susceptible to erosion are artificial fill, soil, and younger alluvium; all three may exist beneath the surface of the

[34] URS. 14 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed ED/Ancillary Building and Central Plant Expansion, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

[35] Metropolitan Water District of Southern California. November 2005. *Regional Urban Water Management Plan*. Los Angeles, CA.

proposed project area. However, most susceptible areas are typically steeper slopes and along drainage courses. Due to the urban conditions and relatively flat nature of the proposed project area, severe site erosion is not anticipated. Construction of the proposed project may create impacts associated with erosion due to potential uncontrolled drainage. However, drainage and erosion issues for the overall site would be addressed in the proposed project in accordance with the building code requirements and storm water BMPs. Therefore, erosion-related impacts associated with the alteration of the existing drainage pattern of the site or area during construction of Tier I would be less than significant.

Tier I of the proposed project requires the redevelopment of a previously disturbed site. The proposed project site does not contain existing drainage patterns nor are there existing drainage patterns within the vicinity that would change due to the proposed project. Upon review of the USGS 7.5-minute series South Gate topographic quadrangle, there are no potential impacts to existing drainage patterns that would result in flooding on site or off site.[36] Impervious surfaces that would result from development of Tier I of the proposed project would be located on areas that are currently impervious (including a surface parking lot comprised of asphalt), as such the Tier I development would not substantially interfere with groundwater infiltration (as discussed above) that could also result in an increase in runoff at the proposed project site in a manner that would adversely impact drainage. Therefore, Tier I would be expected to result in less than significant impacts to hydrology and water quality related to drainage.

Tier II

Tier II of the proposed project would result in less than significant impacts to hydrology and water quality in relation to drainage. Tier II would not substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation either on or off site. The materials most susceptible to erosion are artificial fill, soil, and younger alluvium; all three may exist beneath the surface of the proposed project area. However, most susceptible areas are typically steeper slopes and along drainage courses. Due to the urban conditions and relatively flat nature of the proposed project area, severe site erosion is not anticipated. Construction of Tier II may create impacts associated with erosion due to potential uncontrolled drainage. Drainage and erosion issues for the overall site would be addressed in the proposed project in accordance with the building code requirements and storm water BMPs. Therefore, erosion-related impacts associated with the alteration of the existing drainage pattern of the site or area during construction would be less than significant with the proposed project elements.

Tier II of the proposed project requires the redevelopment of a previously disturbed site. Although development of Tier II of the proposed project would be expected to increase the amount of impervious surfaces, it is anticipated that a substantial portion of that development would occur on currently impervious locations (including a surface parking lot comprised of asphalt). Additionally, Tier II of the proposed project would be expected to implement measure that would substantially reduce the potential impacts of the proposed project to result in altering or in an increase in runoff at the proposed project site in a manner that would adversely impact drainage. The proposed project site does not contain existing drainage patterns nor are there existing drainage patterns within the vicinity that would change due to the construction of Tier II. Upon review of the USGS 7.5-minute series South Gate topographic quadrangle, there are no potential impacts to existing drainage patterns that would

[36] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

result in flooding on site or off site.[37] Therefore, Tier II would result in less than significant impacts to hydrology and water quality related to drainage.

3.7.4.5 100-Year Flood Zone

Tier I

Tier I of the proposed project would result in less than significant impacts to hydrology and water quality in relation to the 100-year flood zone. As discussed under the Existing Conditions in this section, the proposed project is not within a 100- or 500-year flood hazard area or within a designated flood plain management area. Therefore, implementation of Tier I of the proposed project would not result in direct or indirect impacts related to placing housing or other structures within the 100-year flood hazard area or flood plain management area, or expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

Tier I of the proposed project is the development and redevelopment of the existing Martin Luther King, Jr. Medical Center campus which is not located in a 100-year or 500-year flood hazard area based on the information provided by the FEMA maps.[38] Tier I would not involve the development of structures within a 100-year or 500-year flood hazard area. Therefore, the Tier I of the proposed project is not expected to result in significant impacts to hydrology and water quality related to the 100-year flood zone.

Tier II

Tier II of the proposed project would result in less than significant impacts to hydrology and water quality in relation to the 100-year flood zone. As discussed under the Existing Conditions in this section, the proposed project is not within a 100- or 500-year flood hazard area or within a designated flood plain management area. Therefore, implementation of Tier II would not result in direct or indirect impacts related to placing housing or other structures within the 100-year flood hazard area or flood plain management area, or expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

Tier II of the proposed project is the development and redevelopment of the existing Martin Luther King, Jr. Medical Center campus which is not located in a 100-year or 500-year flood hazard area based on the information provided by the FEMA maps.[39] Tier II of the proposed project would not involve the development of structures within a 100-year or 500-year flood hazard area. Therefore, Tier II is not expected to result in significant impacts to hydrology and water quality related to the 100-year flood zone.

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[37] U.S. Geological Survey. [1965] Photo revised 1981. 7.5-Minute Series, South Gate, California, Topographic Quadrangle. Reston, VA.

[38] Federal Emergency Management Agency. Flood Maps. Available at: http://www.fema.gov/hazard/map/index.shtm

[39] Federal Emergency Management Agency. Flood Maps. Available at: http://www.fema.gov/hazard/map/index.shtm

3.7.4.6 Seiche, Tsunamis, and Mudflows

Tier I

Tier I of the proposed project would result in less than significant impacts to hydrology and water quality in relation to seiche, tsunamis, and mudflows. The proposed project site is 10 miles east of the Pacific Ocean and the elevation ranges from 86 feet above MSL to 88 feet above MSL. Due to the distance of the proposed project site from the Pacific Ocean, there is no potential for an impact resulting from a tsunami to occur. The proposed project is not located adjacent to or near an enclosed body of water that would be impacted by a seiche. Tier I is not located or adjacent to steep slopes that would be impacted by mudflows. Due to the sufficient elevation of the proposed project area and the distance from the ocean and other bodies of water, there would be no direct or indirect impacts related to seiches or tsunamis. The low relief of the proposed project area and relatively flat surface significantly reduce the risk for earthquake-related ground failures that would result in mudflows; therefore, there would be no direct or indirect impacts. Therefore, Tier I of the proposed project would not be expected to result in significant impacts to hydrology and water quality related to seiche, tsunamis, and mudflows.

Tier II

Tier II of the proposed project would result in less than significant impacts to hydrology and water quality in relation to seiche, tsunamis, and mudflows. The proposed project site is 10 miles east of the Pacific Ocean and the elevation ranges from 86 feet above MSL to 88 feet above MSL. Due to the distance of the proposed project site from the Pacific Ocean, there is no potential for an impact resulting from a tsunami to occur. The proposed project is not located adjacent to or near an enclosed body of water that would be impacted by a seiche. Tier II is not located or adjacent to steep slopes that would be impacted by mudflows. Due to the sufficient elevation of the proposed project area and the distance from the ocean and other bodies of water, there would be no direct or indirect impacts related to seiches or tsunamis. The low relief of the proposed project area and relatively flat surface significantly reduce the risk for earthquake-related ground failures that would result in mudflows; therefore, there would be no direct or indirect impacts. Therefore, Tier II would not be expected to result in significant impacts to hydrology and water quality related to seiche, tsunamis, and mudflows.

3.7.4.7 Cumulative Impacts

Tier I

The incremental impact of Tier I of the proposed project, when considered with the related past, present, or reasonably foreseeable, probable future projects listed in Section 2, Project Description, would not cause a significant impact to hydrology and water quality. The less than significant impacts after mitigation that are associated with the proposed project would be localized and would not cumulatively impact groundwater levels and quality when analyzed with the other projects in the area. Tier I would include the incorporation of BMPs for sediment and erosion control during construction and therefore would not contribute to or cause a significant cumulative impact on surface water quality and erosion. Therefore, implementation of Tier I would not cause an incremental impact when considered with the related past, present, or reasonably foreseeable, probable future project.

Tier II

The incremental impact of Tier II of the proposed project, when considered with the related past, present, or reasonably foreseeable, probable future projects listed in Section 2, Project Description, would not cause a significant impact to hydrology and water quality. The less than significant impacts after mitigation that are associated with Tier II would be localized and would not cumulatively impact groundwater levels and quality when analyzed with the other projects in the area. Tier II would include the incorporation of BMPs for sediment and erosion control during construction and therefore would not contribute to or cause a significant cumulative impact on surface water quality and erosion. Therefore, implementation of Tier II of the proposed project would not cause an incremental impact when considered with the related past, present, or reasonably foreseeable, probable future project.

3.7.5 Mitigation Measures

Implementation of the following mitigation measures is recommended to avoid, reduce, or eliminate the potential impacts related to hydrology and water quality.

Tier I

Measure Hydrology-1

The County shall ensure that the construction, landscape features, and site grading for Tier I of the project comply with standard best management practices set forth by the Regional Water Quality Control Board. Prior to final plans and specifications for all elements of the project, the County of Los Angeles shall review the plans and specifications for all elements to ensure that the plans and specifications require the construction contractor to prepare a Standard Urban Stormwater Mitigation Plan for construction activities and implement best management practices for construction, materials, and waste handling activities, which will include, but not be limited to:

- Scheduling excavation, grading, and paving activities for dry weather periods.
- Controlling the amount of runoff crossing the construction site by means of berms and drainage ditches to divert water flow around the site.
- Identifying potential pollution sources from materials and wastes that will be used, stored, or disposed of on the site.
- Informing contractors and subcontractors about the clean storm water requirements and enforce their responsibilities in pollution prevention through a contractual agreement
- Sweeping the streets surrounding the proposed project site daily and trash removal throughout the construction of the project to avoid degradation of water quality.

Measure Hydrology-2

The construction contractor shall incorporate Standard Urban Stormwater Mitigation Plan requirements and best management practices to mitigate storm water runoff, which include the following:

- The incorporation of bio-retention facilities located within the project area
- The incorporation of catch basin filtration systems
- The use of porous pavements to reduce runoff volume

Measure Hydrology-3

In the event that groundwater is encountered during Tier I construction, the County of Los Angeles shall require the construction contractor complete the dewatering operations in accordance with the established National Pollution Discharge Elimination System permit requirements.

Measure Hazards-1

To reduce surface water quality impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. A Spill Prevention Control and Countermeasures Plan shall be developed as a part of these requirements to address the handling of petroleum or other hazardous materials during refueling, operations and maintenance and other construction related activities. The agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Tier II

Measure Hydrology-1

The County shall ensure that the construction, landscape features, and site grading for Tier II of the project comply with standard best management practices set forth by the Regional Water Quality Control Board. Prior to final plans and specifications for all elements of the project, the County of Los Angeles shall review the plans and specifications for all elements to ensure that the plans and specifications require the construction contractor to prepare a Standard Urban Stormwater Mitigation Plan for construction activities and implement best management practices for construction, materials, and waste handling activities, which will include, but not be limited to:

- Scheduling excavation, grading, and paving activities for dry weather periods.
- Controlling the amount of runoff crossing the construction site by means of berms and drainage ditches to divert water flow around the site.
- Identifying potential pollution sources from materials and wastes that will be used, stored, or disposed of on the site.
- Informing contractors and subcontractors about the clean storm water requirements and enforce their responsibilities in pollution prevention through a contractual agreement
- Sweeping the streets surrounding the proposed project site daily and trash removal throughout the construction of the project to avoid degradation of water quality.

Measure Hydrology-2

The construction contractor shall incorporate Standard Urban Stormwater Mitigation Plan requirements and best management practices to mitigate storm water runoff, which include the following:

- The incorporation of bio-retention facilities located within the project area

- The incorporation of catch basin filtration systems
- The use of porous pavements to reduce runoff volume

Measure Hydrology-3

In the event that groundwater is encountered during Tier I construction, the County of Los Angeles shall require the construction contractor to complete the dewatering operations in accordance with the established National Pollution Discharge Elimination System permit requirements.

Measure Hydrology-4

To ensure that operational impacts associated with Tier II remain below the level of significance, the County shall require that best management practices and sustainable practices, such as regularly removing vegetation and debris from curbs, catch basins, and outlets; limiting the amount of pesticides and fertilizers used in landscaping, and other best management practice as recommended by the Environmental Protection Agency or in the California Stormwater Best Management Practice Handbooks as ongoing maintenance measures, are implemented into a maintenance plan for the campus.

Measure Hazards-1

To reduce surface water quality impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. A Spill Prevention Control and Countermeasures Plan shall be developed as a part of these requirements to address the handling of petroleum or other hazardous materials during refueling, operations and maintenance and other construction related activities. The agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

3.6.6 Level of Significance after Mitigation

Tier I

Implementation of mitigation measures Hydrology-1 through Hydrology-4, in addition to Hazards-1, would reduce significant hydrology and water quality impacts related to construction-related water quality to below the level of significance.

Tier II

Implementation of mitigation measures Hydrology-1 through Hydrology-4, in addition to Hazards-1, would reduce significant hydrology and water quality impacts related to construction- and operation-related water quality to below the level of significance.

3.8 NOISE

As a result of the Initial Study, the County of Los Angeles determined that the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in noise impacts.[1] Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts from noise.

The analysis of noise consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions in the proposed project area, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation.

The potential for impacts from noise has been analyzed utilizing the findings of the Noise Impact Analysis (Appendix F, *Noise Technical Report*)[2] in accordance with the methodologies provided by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines,[3] the County of Los Angeles (County) General Plan,[4] and the County Noise Ordinance.[5]

The definitions for noise and ground-borne vibration are discussed in this section to provide context for the evaluation of noise as it relates to the proposed project.

Definitions

Noise

Noise is defined as unwanted sound. The human response to environmental noise is subjective and varies considerably from individual to individual. Sensitive receptors, such as residential areas, convalescent homes, schools, auditoriums, and other similar land uses, may be affected to a greater degree by increased noise levels than industrial, manufacturing, or commercial facilities. The effects of noise can range from interference with sleep, concentration, and communication, to the causation of physiological and psychological stress, and, at the highest intensity levels, hearing loss.

The method commonly used to quantify environmental noise involves evaluation of all frequencies of sound, with an adjustment to reflect the constraints of human hearing. Since the human ear is less sensitive to low and high frequencies than to midrange frequencies, noise measurements are weighted more heavily within those frequencies of maximum human sensitivity in a process called "A-weighting," written as dBA (decibels in A-weighted sound levels). In practice, environmental

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[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

[2] Sapphos Environmental, Inc. August 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Noise Impact Analysis*. Pasadena, CA.

[3] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[4] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[5] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Ordinance 11778, Section 2 (Article 1, Section 101); Ordinance 11773, Section 2 (Article 1, Section 101). Chapter 12.08. Available at: http://ordlink.com/codes/lacounty/index.htm

noise is measured using a sound level meter that includes an electronic filter corresponding to the A-weighted (Table 3.8-1, *A-weighted Sound Levels).*

TABLE 3.8-1
A-WEIGHTED SOUND LEVELS

Noise Source	A-weighted Sound Level (in dBA)	Subjective Loudness	Effect of Noise
Near jet engine	130	Intolerable or deafening	Hearing loss
Loud auto horn	100	Very noisy	Hearing loss
Normal conversation at 5–10 feet	60	Loud	Speech interference
Bird calls	40	Moderate	Sleep disturbance
Whisper	30	Faint	No effect
Rustling leaves	10	Very faint	No effect

NOTE: dBA = decibels in A-weighted sound levels

There are several statistical tools used to evaluate and compare noise level measurements. To account for the fluctuation in noise levels over time, noise impacts are commonly evaluated using time-averaged noise levels. Equivalent Levels (Leq) are used to represent the noise level experienced over a stated period of time averaged as a single noise level. Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, an artificial decibel increment is added to quiet-time noise levels to create a 24-hour noise descriptor, or a 24-hour Leq, called the Community Noise Equivalent Level (CNEL). This equivalent level is also known as the Day-Night Level (Ldn).

Another measure used to characterize noise exposure is the variation in sound levels over time, measured by the percentage exceedance level. L_{10} is the A-weighted sound level that is exceeded for 10 percent of the measurement period, and L_{90} is the level that is exceeded for 90 percent of the measurement period. L_{50} is the median sound level. Additional statistical measures include L_{min} and L_{max}, the minimum and maximum sound levels, respectively, measured during a stated measurement period.

These descriptions of noise are based on the sound level at the point of measurement. When determining potential impacts to the environment, the noise level at the receptor is considered. Noise is attenuated as it propagates from the source to the receiver. Attenuation is the reduction in the level of sound resulting from absorption by the topography, the atmosphere, distance, barriers, and other factors. Attenuation is also logarithmic, rather than linear, so that noise levels decrease approximately 6 dBA for every doubling of distance.

Ground-Borne Vibration Definition

Vibration is an oscillatory motion, which can be described in terms of displacement, velocity, or acceleration. Because motion is oscillatory and there is no net movement of the vibrating element, the average of any of the motion descriptors is zero. Displacement is the easiest descriptor to understand. For a vibrating floor, the displacement is simply the distance that a point on the floor moves away from its static position. The velocity represents the instantaneous speed of the movement, and the acceleration represents the rate of change in the speed.

Although displacement is easier to understand than velocity and acceleration, it is rarely used for describing ground-borne vibration. This is because most transducers used to measure ground-borne vibration use either velocity or acceleration. Even more important, the response of humans, buildings, and equipment to vibration is more accurately described using velocity or acceleration. Therefore, ground-borne vibration is measured as a velocity level in 10^{-6} inches per second.

The effects of ground-borne vibration include striking movements of the building floors, rattling of windows, or shaking of items on shelves or hangings on walls. The rumble is the noise radiated from the motion and contact of room surfaces. In essence, the room surfaces act like a loudspeaker. This is called ground-borne noise. In extreme cases, vibrations can cause damage to buildings. Ground vibrations from construction activities rarely reach levels that can damage structures, but can achieve the audible and perceptible ranges in buildings close to a construction site. Peak Particle Velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. PPV is an appropriate measure for evaluating potential building damage during construction. Construction vibration impacts are assessed in terms of PPV.

3.8.1 Regulatory Framework

State

California Senate Bill 860, which became effective January 1, 1976, directed the California Office of Noise Control within the State Department of Health Services to prepare "Guidelines for the Preparation and Content of Noise Elements of the General Plan."[6] One purpose of these guidelines was to provide sufficient information concerning the noise environment in the community so that noise could be considered in the land use planning process. As part of this publication, Land Use Compatibility Standards were developed in four categories: Normally Acceptable, Conditionally Acceptable, Normally Unacceptable, and Clearly Unacceptable. These categories were based on earlier work done by the U.S. Department of Housing and Urban Development (HUD). The interpretation of the four categories is as follows:

- Normally Acceptable: Specified land use is satisfactory without special insulation.
- Conditionally Acceptable: New development requires detailed analysis of noise insulation requirements.
- Normally Unacceptable: New development is discouraged and requires a detailed analysis of insulation features.
- Clearly Unacceptable: New development should not be undertaken.

The State of California has developed a Land Use Compatibility Matrix for community noise environments that further defines four categories of acceptance and assigns CNEL values to them. In addition, the State Building Code (Title 24, California Code of Regulations [CCR], Part 2) establishes uniform minimum noise insulation performance standards to protect persons within new hotels, motels, dormitories, long-term care facilities, apartment houses, and residential units other than detached single-family residences from the effects of excessive noise, including, but not limited to, hearing loss or impairment and interference with speech and sleep. Residential structures to be located where the CNEL or L_{dn} is 60 dBA or greater are required to provide sound insulation to limit the interior CNEL to a maximum of 45 dBA. An acoustic, or noise, analysis

[6] California Department of Health Services, Office of Noise Control. February 1976. *Guidelines for the Preparation and Content of Noise Elements of the General Plan*. Contact: California Department of Health Services, Office of Noise Control, P.O. Box 942732 Sacramento, CA 94234-7320.

report prepared by an experienced acoustic engineer is required for the issuance of a building permit for these structures. Conversely, land use changes that result in increased noise levels at residences of 60 dBA or greater must be considered in the evaluation of impacts to ambient noise levels.

Local

County of Los Angeles

The County Noise Control Ordinance[7] provides for the designation of noise-sensitive zones but does not define specific land uses for these zones. Instead, Section 12.08.260 defines a "noise-sensitive zone" as any area designated, pursuant to Part 4 of the chapter, for the purpose of ensuring a state of exceptional quiet. Section 12.08.470 refers to the use of these zones at individual institutions or facilities that have been designated by the local health officer. These must be indicated by the display of conspicuous signs in at least three separate locations within 164 meters (0.1 mile) of the institution or facility.

Operational Noise

The County does not set land use standards for noise in the Noise element of the General Plan. However, the County has adopted the Noise Control Ordinance of the County,[8] which specifies exterior noise standards as shown in Table 3.8.1-2, *County of Los Angeles Exterior Noise Standards*. The exterior noise levels presented in the final column of Table 3.8.1-2 indicate the average hourly dBA to be maintained for designated noise zone level use.

TABLE 3.8.1-2
COUNTY OF LOS ANGELES EXTERIOR NOISE STANDARDS

Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level[1]
I	Noise-Sensitive Area[2]	Anytime	45 dBA
II	Residential Area	10:00 p.m. – 7:00 a.m. (Nighttime) 7:00 a.m. – 10:00 p.m. (Daytime)	45 dBA 50 dBA
III	Commercial Area	10:00 p.m. – 7:00 a.m. (Nighttime) 7:00 a.m. – 10:00 p.m. (Daytime)	55 dBA 60 dBA
IV	Industrial Area	Anytime	70 dBA

NOTES:
1. Required average hourly noise standard.
2. Noise-sensitive area is designated to ensure exceptional quiet.

[7] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Available at: http://ordlink.com/codes/lacounty/index.htm

[8] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Available at: http://ordlink.com/codes/lacounty/index.htm

SOURCE: County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Ord. 11778, Section 2 (Art.1, Section 101), and Ord.11773, Section 2 (Art. 1, Section 101). Available at: http://ordlink.com/codes/lacounty/index.htm

The County Ordinance includes five standards for governing exterior noise levels:[9]

> **Standard No. 1:** shall be the exterior noise level that may not be exceeded for a cumulative period of more than 30 minutes in any hour. Standard No. 1 shall be the applicable noise level stated above, or if the ambient L_{50} exceeds the foregoing level, then the ambient L_{50} becomes the exterior noise level for Standard No. 1.
>
> **Standard No. 2:** shall be the exterior noise level that may not be exceeded for a cumulative period of more than 15 minutes in any hour. Standard No. 2 shall be the applicable noise level stated above, plus 5 dB, or if the ambient L_{25} exceeds the foregoing level, then the ambient L_{25} becomes the exterior noise level for Standard No. 2.
>
> **Standard No. 3:** shall be the exterior noise level that may not be exceeded for a cumulative period of more than 5 minutes in any hour. Standard No. 3 shall be the applicable noise level stated above, plus 20 dB, or if the ambient $L_{8.3}$ exceeds the foregoing level, then the ambient $L_{8.3}$ becomes the exterior noise level for Standard No. 3.
>
> **Standard No. 4:** shall be the exterior noise level that may not be exceeded for a cumulative period of more than 1 minute in any hour. Standard No. 4 shall be the applicable noise level stated above, plus 15 dB, or if the ambient $L_{1.7}$ exceeds the foregoing level, then the ambient $L_{1.7}$ becomes the exterior noise level for Standard No. 4.
>
> **Standard No. 5:** shall be the exterior noise level that may not be exceeded for any period of time. Standard No. 5 shall be the applicable noise level stated above, plus 20 dB, or if the ambient L_0 exceeds the foregoing level, then the ambient L_0 becomes the exterior noise level for Standard No. 5.

Construction Noise

The County Noise Control Ordinance also includes the following construction noise restrictions:

- Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work is prohibited between the weekday hours of 8:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays,[10] such that the sound creates a noise disturbance across a residential or commercial property line, except for emergency work of public service utilities or by a variance issued by the health officer.

- The contractor shall conduct construction activities in such a manner that the maximum noise levels for non-scheduled, intermittent, short-term operation of mobile equipment and that for repetitively scheduled and relatively long-term

[9] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Available at: http://ordlink.com/codes/lacounty/index.htm

[10] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Available at: http://ordlink.com/codes/lacounty/index.htm. The ordinance also includes extended time limitations for specific construction related noise as described in table 3.8.1-3, *Maximum Construction Noise Levels*.

operation of stationary equipment at affected structures will not exceed those listed in Table 3.8.1-3, *Maximum Construction Noise Levels*, at any time.

- All mobile or stationary equipment or machinery powered by internal combustion engines will be equipped with suitable exhaust and air-intake silencers in proper working order.

- In case of a conflict between this noise ordinance and any other ordinance regulating construction activities, provisions of any specific ordinance regulating construction activities will take precedence.

TABLE 3.8.1-3
MAXIMUM CONSTRUCTION NOISE LEVELS

	Residential Structures		
	Single-family Residential	**Multi-family Residential**	**Semi-residential / Commercial**
Mobile Equipment: Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment			
Daily – 7:00 a.m. to 8:00 p.m. (except Sundays and legal holidays)	75 dBA	80 dBA	85 dBA
Daily – 8:00 p.m. to 7:00 a.m., Sundays and legal holidays	60 dBA	64 dBA	70 dBA
Stationary Equipment: Maximum noise level for repetitively scheduled and relatively long-term operation (more than 10 days) of stationary equipment			
Daily – 7:00 a.m. to 8:00 p.m. (except Sundays and legal holidays)	60 dBA	65 dBA	70 dBA
Daily – 8:00 p.m. to 7:00 a.m., Sundays and legal holidays	50 dBA	55 dBA	60 dBA
	Business Structures		
Mobile Equipment: Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment			
Daily – all hours (including Sundays and legal holidays)	85 dBA		

SOURCE: [1] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Available at: http://ordlink.com/codes/lacounty/index.htm

However, the County Noise Ordinance includes a list of activities that are exempt, including:

- The emission of sound for the purpose of alerting persons to the existence of an emergency, or the emission of sound in the performance of emergency work.

- The use of warning devices necessary for the protection of public safety, such as police, fire, and ambulance sirens, and train horns.[11]

[11] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Ord. 11778, Section 2 (Art.1, Section 101), and Ord.11773, Section 2 (Art. 1, Section 101). Available at: http://ordlink.com/codes/lacounty/index.htm

Vibration

The County Noise Ordinance prohibits the operation of any device that creates vibration which is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property, or at 150 feet (46 meters) from the source if on a public space or public right-of-way is prohibited. The perception threshold shall be a motion velocity of 0.01 in/sec over the range of 1 to 100 Hertz. The County establishes that the level at which vibration is perceived to be a motion velocity of 0.01 in/sec over the range of 1 to 100 Hertz.[12]

3.8.2 Existing Conditions

3.8.2.1 Ambient Noise Levels

The existing noise environment in the vicinity of the proposed project site is typical of urban areas and is characterized by noise levels generated by vehicular traffic on nearby streets and highways, occasional aircraft flyway, dogs barking, and lawn mowers.

To analyze the significance of noise and vibration levels associated with the proposed project's construction and operation, the existing noise levels (the ambient noise level at the proposed project site) were measured during peak afternoon hours. Ambient noise level measurements were taken on April 6, 2010, during a typical weekday at sensitive receptors to the north, east, south, and west of the proposed project site between 4:00 p.m. and 6:00 p.m. (Figure 3.8.2.1-1, *Measured Ambient Noise Levels in Proposed Project Vicinity*). The measured ambient noise levels ranged from 55.2 dBA to 70.2 dBA (Table 3.8.2.1-1, *Measured Ambient Noise Levels in the Vicinity of the Proposed Project)*. These measurements are 20-minute L_{eq} noise levels.

TABLE 3.8.2.1-1
MEASURED AMBIENT NOISE LEVELS IN THE VICINITY OF THE PROPOSED PROJECT

Location	Ambient Noise Level
North (119th Street)	66.2 dBA
East (Wilmington Avenue)	69.7 dBA
South (122nd Street)	55.2 dBA
West (Compton Avenue)	70.2 dBA

NOTE: dBA = decibels in A-weighted sound levels

3.8.2.2 Noise Receptors

The noise levels of the proposed project were evaluated at noise receptors in the vicinity of the proposed project (Figure 3.8.2.2-1, *Noise Receptors*).

- Schools: The King/Drew Magnet High School of Medicine and Science (King Drew High School) is located north of the proposed project site across 119th Street (Receptor 1A, Figure 3.8.2.2-1), and Head Start/ Lincoln Drew Elementary is located north of the proposed project site on the north side of 118th Street (Receptor 1B, Figure 3.8.2.2-1).

[12] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Ord. 11778, Section 2 (Art.1, Section 101), and Ord.11773, Section 2 (Art. 1, Section 101). Available at: http://ordlink.com/codes/lacounty/index.htm

FIGURE 3.8.2.1-1

Measured Ambient Noise Levels in Proposed Project Vicinity

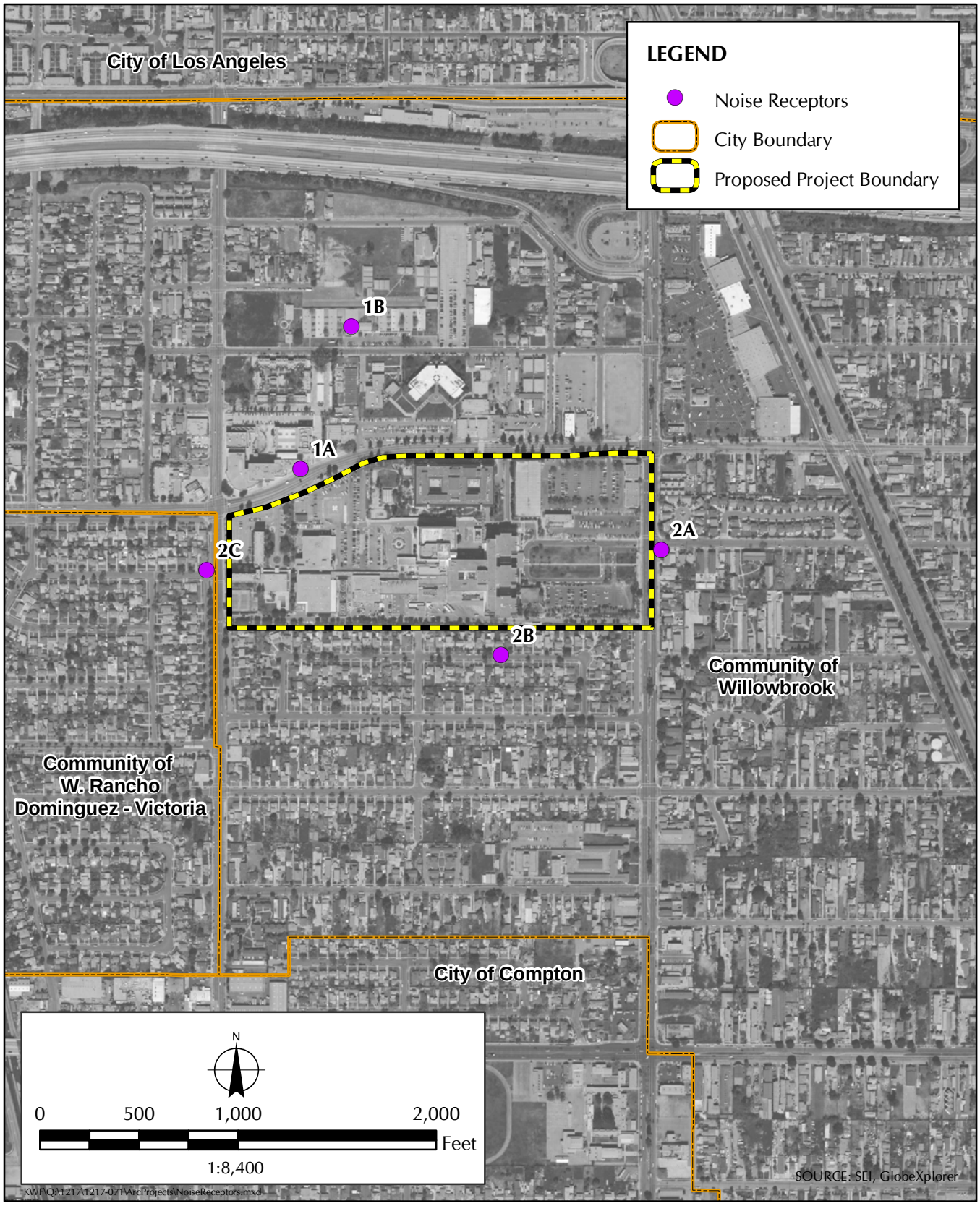

FIGURE 3.8.2.2-1

Noise Receptors

- Residential Land Uses (Receptors 2A, 2B, 2C, and 2D, Figure 3.8.2.2-1): Residential areas are located to the east, south, and west of the proposed project site.

The distances from the noise-sensitive receptors to the proposed project site are summarized in Table 3.8.2.2-1, *Noise-Sensitive Receptor Points in the Vicinity of the Proposed Project Site*.

TABLE 3.8.2.2-1
NOISE RECEPTOR POINTS IN THE VICINITY OF THE PROPOSED PROJECT SITE

Type of Receptor	Location on Figure 3.8.2.2-1	Direction	Shortest Distance to the Proposed Project Site
School	1A	North (Across 119th Street)	95 feet
	1B	North (Across 118th Street)	550 feet
Residential	2A	East (across Wilmington Avenue)	100 feet
	2B	South (across 122nd Street)	50 feet
	2C	West (across Compton Avenue)	90 feet

3.8.2.3 Airports and Airport Land Use Plans

The proposed project site is neither located within 2 miles of a public or private airstrip nor is it located within an airport land use plan. The nearest airport, the Compton/Woodley Airport, is located approximately 2.1 miles south of the proposed project site. The proposed project site is not located within the immediate vicinity of any private airstrip. The Saint Francis Medical Center which is located in the City of Lynwood, approximately 2.7 miles east of the proposed project site has a helistop and the next nearest airport, the Gardena Valley Airport in the City of Gardena, is located approximately 4 miles southeast of the proposed project site. A helipad is located at the proposed project site, on the roof of the Inpatient Tower for hospital-specific emergency use.

The nearest private airstrip is located in Playa Vista at 5510 Lincoln Boulevard, approximately 11.5 miles northwest of the proposed project site.

3.8.3 Significance Thresholds

The potential for the proposed project to result in impacts related to noise was analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines. The project would normally be considered to have a significant impact to noise when the potential for any one of the following six thresholds occurs:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

- Exposure of persons to or generation of excessive groundborne vibration;

- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;

- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;

- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public or public use airport, exposure of persons residing or working in the project area to excessive noise levels; or

- For a project within the vicinity of a private airstrip, exposure of persons residing or working in the project area to excessive noise levels.

The potential for operation of the proposed project to result in significant impacts on ambient noise levels was assessed in relation to the Community Noise Equivalent Level (CNEL) (Table 3.8.3-1, *Ambient Noise Significance Thresholds*).

TABLE 3.8.3-1
AMBIENT NOISE SIGNIFICANCE THRESHOLDS

CNEL Increase	Category Change	Significant Impact?
5 dBA or more	No	Yes
4 to 5 dBA	No	Yes
3 to 4 dBA	Yes	No
0 to 3 dBA	No	No

NOTE: dBA = decibels in A-weighted sound levels

The potential for operation of the proposed project to result in significant impacts with regard to vibration was assessed based upon a motion velocity of 0.01 in/sec over the range of 1 to 100 Hertz for operation and a peak particle velocity 0.2 in/sec for construction.[13]

3.8.4 Impact Analysis

3.8.4.1 Exposure of Persons to or Generation of Noise Levels in Excess of Standards

Tier I

The impact to noise related to exposure or generation of noise levels in excess of established standards from the proposed project would be expected to remain significant and unavoidable with the incorporation of mitigation measures.

Tier II

The impact to noise related to exposure or generation of noise levels in excess of established standards from the proposed project would be expected to remain significant and unavoidable with the incorporation of mitigation measures.

[13] County of Los Angeles. 1978. *Noise Control Ordinance of the County of Los Angeles*. Ord. 11778, Section 2 (Art.1, Section 101), and Ord.11773, Section 2 (Art. 1, Section 101). Available at: http://ordlink.com/codes/lacounty/index.htm

3.8.4.2 Construction Noise

Construction of the proposed project would result in an increase in heavy-duty trucks traveling on streets surrounding the proposed project site. Section 2.4.4.1 of the Project Description describes the two anticipated construction vehicle routes for accessing and exiting the proposed project site: the north haul route and the south haul route. The north and south haul routes utilize the heavily trafficked main thoroughfares in the vicinity of the proposed site, Wilmington Avenue and Compton Avenue, and avoid less trafficked residential streets. Ambient noise increases along Wilmington and Compton Avenues would not be expected to be significantly increased by the addition of heavy-duty vehicles trips during construction of the proposed project as the increase in vehicles would be a marginal increase over existing levels.

Construction noise for the proposed project would generally occur in phases. Average noise levels associated with various construction phases where all pertinent equipment is present and operating at a reference distance of 50 feet are presented in Table 3.8.4.2-1, *Construction Activity Noise Levels at 50 Feet*.

TABLE 3.8.4.2-1
CONSTRUCTION ACTIVITY NOISE LEVELS AT 50 FEET

Activity	Noise Level at 50 feet (dBA)
Ground Clearing/Demolition	84 ± 6 dBA
Excavations	89 ± 6 dBA
Foundations	78 ± 3 dBA
Erection of structures	85 ± 5 dBA
Finishing (i.e., paving)	89 ± 6 dBA

SOURCE: Bolt, Beranek, and Newman. December 1971. *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*. Washington, DC.

Based on the construction activity noise levels in Table 3.8.4.2-1, the distance at which impacts would be below the level of significance is predicted. This distance is then compared to the nearest noise receptor distance. Since noise sources are not stationary, this approach is used rather than predicting the noise levels at the nearest receptor. If the distance to the nearest noise receptor is more than the "distance at which impact will occur" then there would be no negative impact. Multiple phases of construction may occur simultaneously; however, they would be spread out over the proposed project area. If multiple phases of construction were to occur simultaneously it is not anticipated that the maximum construction noise levels would be noticeably greater than the construction noise level during the loudest phases of construction in isolation. For example, if construction is in the finishing phase at a location 50 feet from a sensitive receptor, the noise level from the finishing phase is assumed to be 89 dBA. If construction were simultaneously in the erection of structures phase 100 feet from the same the sensitive receptor, the noise level from the erection of structures phase would be 79 dBA. The combined noise level generated by construction in the finishing phase 50 feet from the sensitive receptor and in the erection phase 100 feet from the sensitive receptor would be 89.41 dBA, a negligible increase of less than one half of a decibel over the finishing construction noise in isolation. Therefore, the noise levels during the loudest phases of construction at sensitive receptors were used to determine the noise impacts at sensitive receptors and the noise levels produced by multiple phases of construction were not considered. The results are presented in Table 3.8.4.2-2, *Predicted Distance at which Construction Noise Impacts would be Below the Level of Significance*.

TABLE 3.8.4.2-2
PREDICTED DISTANCE AT WHICH CONSTRUCTION NOISE IMPACTS WOULD BE BELOW THE LEVEL OF SIGNIFICANCE

Construction Phase	Distance at which Impact would be Below the Level of Significance at Respective Land Use*	
	Residential (75 dBA)	Commercial (85 dBA)
Ground Clearing/ Demolition	160 feet	50 feet
Excavations	280 feet	90 feet
Foundations	80 feet	25 feet
Erection of structures	180 feet	50 feet
Finishing (i.e., paving)	280 feet	90 feet
Actual distance to nearest noise receptor	East (across Wilmington Avenue: 100 ft South (across 122nd Street): 50 ft West (across Compton Avenue): 90 ft	North (across 119th Street): 95 ft North (across 118th Street): 550 ft

NOTE:
* Noise levels will vary depending on the location of the construction activities on the site.

Tier I

As shown in Table 3.8.4.2-2, the distance at which Tier I construction noise impacts would be below the level of significance for a commercial property for the different construction phases ranges from 25 to 90 feet. Therefore, construction noise levels would not be expected to exceed 85 dBA at the King Drew High School or at Head Start/ Lincoln Drew Elementary.

As shown in Table 3.8.4.2-2, the distance from the proposed project site at which impacts to affected residential structures would be below the level of significance is 280 feet. The nearest residential land use is approximately 50 feet south of the proposed project site. Since residential structures located to the east, south, and west of the proposed project are within 280 feet of the proposed project site, the consideration of mitigation measures would be required.

Tier II

As shown in Table 3.8.4.2-2, the distance at which Tier II construction noise impacts would be below the level of significance for a commercial property for the different construction phases ranges from 25 to 90 feet. Therefore, construction noise levels would not be expected to exceed 85 dBA at the King Drew High School or at Head Start/ Lincoln Drew Elementary.

As shown in Table 3.8.4.2-2, the distance from the proposed project site at which impacts to affected residential structures would be below the level of significance is 280 feet. The nearest residential land use is approximately 50 feet south of the proposed project site. Since residential structures located to the east, south, and west of the proposed project are within 280 feet of the proposed project site, the consideration of mitigation measures would be required.

Ambient Noise Levels

Tier I

Tier I of the proposed project would result in temporary significant impacts to ambient noise levels during construction of the proposed project. As discussed previously, construction of the proposed project would result in temporary noise increases at nearby residences that exceed County thresholds for construction noise. Therefore, construction of the proposed project would temporarily result in significant impacts from increases in ambient noise levels during construction, thus requiring the consideration of mitigation measures.

Tier II

Tier II of the proposed project would result in temporary significant impacts to ambient noise levels during construction of the proposed project. As discussed previously, construction of the proposed project would result in temporary noise increases at nearby residences that exceed County thresholds for construction noise. Therefore, construction of the proposed project would temporarily result in significant impacts from increases in ambient noise levels during construction, thus requiring the consideration of mitigation measures.

3.8.4.3 Operation Noise

Building Operation

Tier I

Operation of the mechanical systems of the proposed project would generate noise levels. Potential building operation noise was predicted using typical HVAC (Heating, Ventilating, and Air Conditioning) equipment systems. Typical equipment noise levels are 55 dBA at 50 feet from the rooftop source without shielding. Standard design features including shielding would reduce noise emissions below this level. Tier I project elements would occur in the central part of the proposed project area, approximately 270 feet from the nearest residences located to the south of the proposed project site. The measured ambient noise level at residences to the south of the proposed project site is 55.2 dBA. If HVAC equipment was located 50 feet from the residences to the south of the proposed project site, noise generated by the HVAC equipment would have potentially be 34.4 dBA. At this level, the noise from the HVAC equipment at residences would be well below the ambient noise level and would not be perceptible

Tier II

Operation of the mechanical systems of the proposed project would generate noise levels. Potential building operation noise was predicted using typical HVAC (Heating, Ventilating, and Air Conditioning) equipment systems. Typical equipment noise levels are 55 dBA at 50 feet from the rooftop source without shielding. Standard design features including shielding would reduce noise emissions below this level. The nearest sensitive receptors to potential locations of HVAC equipment are residences located to the south of the proposed project site. The measured ambient noise level at residences to the south of the proposed project site is 55.2 dBA. If HVAC equipment was located 50 feet from the residences to the south of the proposed project site, noise generated by the HVAC equipment would have the potential to exceed the 50 dBA daytime noise limit and the 45 dBA nighttimes noise limit. However, it would not exceed the measured ambient noise

level. During nighttime hours, when noise from traffic is less than during daytime hours, HVAC equipment at 50 feet from residences would potentially result in a significant noise impact. However, it is anticipated that new buildings on the campus would be consistent with the existing campus layout and building setbacks. As a result, any anticipated increases in the noise levels would be reduced. Additionally, mitigation measures would be incorporated to ensure that noise levels from building operation are below the level of significance.

Traffic

The traffic study prepared for the proposed project was reviewed to ascertain off-site noise impacts from changes in traffic volumes along adjacent roadways resulting from implementation of the proposed project. With respect to roadway noise impacts from vehicles traveling to and from the proposed project, the greatest project-related traffic would be generated during peak a.m. and p.m. hours.

Tier I

Tier I of the proposed project would result in a net decrease in trips generated by Martin Luther King, Jr. Medical Center Campus; as the functions, programs and operations of various campus buildings and structures would be removed. Therefore, Tier 1 of the proposed project would not result in an increase in noise levels from project-related traffic.

Tier I of the proposed project would result in significant impacts from exposure of persons to, or generation of, noise during construction of the proposed project. The noise generated by the proposed project would potentially exceed County construction noise limits at sensitive receptors. Therefore, implementation of the proposed project would result in significant impacts from exposure of persons to, or generation of, noise, thus requiring the consideration of mitigation measures.

Tier II

Tier II of the proposed would result in an increase in traffic volumes at intersections in the vicinity of the proposed project, as a result of the new development and extended phased construction period. The intersections with the greatest percentage increases in traffic volumes are expected to be Compton Avenue and 118th Street during the p.m. peak-hour and Wilmington Avenue and MLK Hospital Driveway/120th Street during the p.m. peak-hours. The existing total p.m. traffic volume at the intersection of Compton Avenue and 118th Street, which is located on the east side of the proposed project, site is 625 vehicles. The anticipated 2020 p.m. peak-hour traffic volume at this intersection would be 1180 vehicles, an 89 percent increase over existing levels. The existing total p.m. traffic volume at the intersection of Wilmington Avenue and MLK Hospital Driveway/120th Street, which is located northeast of the proposed project site is 2010 vehicles. The anticipated 2020 p.m. peak-hour traffic volume at this intersection would be 3395 vehicles, a 69 percent increase over existing levels. A noise increase in 3-dBA is considered to be barely perceptible. Therefore, increased traffic could cause a perceptible change in noise if it results in a greater than 3-dBA Ldn increase in ambient noise levels. Decibels are a logarithmic unit for measuring sound pressure levels. The decibel level from two equivalent sources of sound producing noise simultaneously, such as vehicle traffic, results is 3 decibels greater than the decibel level of one

source.[14] Therefore, a doubling in traffic volumes would be necessary to cause noise to increase over 3 dBA, in areas that already experience excessive noise from heavy traffic, the 89-percent increase in traffic at the intersection Compton Avenue and 118th Street and the 69-percent increase in traffic at the intersection Wilmington Avenue and MLK Hospital Driveway/120th Street that would be expected with completion of Tier II of the proposed project would result in less than a 3-dBA increase in noise levels, and as such, the traffic-related noise increases would not be expected to be perceptible. Therefore, increased noise levels generated by the anticipated increase in traffic levels from the proposed project would result in a less than significant impact.

Tier II of the proposed project would result in significant impacts from exposure of persons to, or generation of, noise during construction of the proposed project. The noise generated by the proposed project would potentially exceed County construction noise limits at sensitive receptors. Therefore, implementation of the proposed project would result in significant impacts from exposure of persons to, or generation of, noise, thus requiring the consideration of mitigation measures.

Groundborne Vibration and Groundborne Noise Levels

Implementation of the proposed project would potentially result in significant impacts from groundborne vibration and groundborne vibration noise levels. Groundborne vibration would be generated by the proposed project during construction activities. Operation of the proposed project would not generate substantial levels of vibration and, therefore, is not analyzed below. Construction activities can generate varying degrees of ground vibration, depending on the construction procedures, construction equipment used, and proximity to vibration-sensitive uses. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. Vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames. It is typically not perceptible outdoors and, therefore, impacts are based on the distance to the nearest building. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. Ground vibrations from construction activities rarely reach levels that can damage structures, but can achieve the audible and perceptible ranges in buildings close to a construction site. Peak Particle Velocity is defined as the maximum instantaneous peak of the vibration signal. PPV is an appropriate measure for evaluating potential building damage during construction. Construction vibration impacts are assessed in terms of PPV. People perceive vibration over time. Therefore, to evaluate the perceived level of vibration by nearby people the root mean square (rms) amplitude is used as it indicates the average vibration level produced by a signal.[15]

The nearest sensitive land uses from the existing campus are the residences which are located approximately 50 feet south of the proposed project site. Vibration would primarily occur during the grading and foundation phases of construction. The vibration velocities of typical construction equipment appear in Table 3.8.4.3-1, *Vibration Velocities for Construction Equipment*.

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[14] "Highway Traffic Noise Analysis and Abatement Policy and Guidance." U.S. Department of Transportation Federal Highway Administration. Available at: http://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm

[15] Federal Transit Administration. May 2006. Transit Noise and Vibration Impact Assessment. Washington DC.

TABLE 3.8.4.3-1
VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT

Equipment	PPV at 25 Feet (inches/second)*	Approximate L_v* at 25 feet
Pile driving (impact)	0.644	104
Pile driving (sonic)	0.170	93
Caisson drilling	0.089	87
Large bulldozer	0.089	87
Loaded trucks	0.076	86

*RMS velocity in decibels (VdB)
Source: Federal Transit Administration. May 2006. Transit Noise and Vibration Impact Assessment. Washington DC.

Anticipated vibration levels at the sensitive receptors were calculated in the Noise Impact Report. To evaluate human annoyance from daytime construction activities, the vibration velocities of Table 3.8.4.3-2, *Construction-Related Vibration Levels at the Nearest Sensitive Receptor, Structural Damage*, lists the maximum vibration levels from heavy construction equipment that would be experienced at the nearest sensitive receptor.

TABLE 3.8.4.3-2
CONSTRUCTION-RELATED VIBRATION LEVELS AT THE NEAREST SENSITIVE RECEPTOR, STRUCTURAL DAMAGE

Equipment	Maximum PPV in In/Sec at Residences (50 feet from vibration Source)	Significance Threshold (PPV in In/Sec)	Exceeds Significance Threshold
Pile driving (impact)	0.2277	0.2	Yes
Pile driving (sonic)	0.0601	0.2	No
Caisson drilling	0.0315	0.2	No
Large bulldozer	0.0315	0.2	No
Loaded trucks	0.0269	0.2	No

The Federal Transit Administration (FTA) has found that structural damage is possible when the PPV exceeds 0.2 inch per second. This criterion is the threshold at which there is a risk of damage to residential buildings. The RMS level at which people generally are able to perceive vibration is 65 VdB and levels are not usually considered significant unless they exceeds 70 VdB.[16]

Proposed project construction activities would be likely to result in RMS levels that would be perceptible (Table 3.8.4.3-3, *Construction-Related Vibration Levels at the Nearest Sensitive Receptor, Human Perception*).

[16] Federal Transit Administration. May 2006. Transit Noise and Vibration Impact Assessment. Washington DC.

TABLE 3.8.4.3-3
CONSTRUCTION-RELATED VIBRATION LEVELS AT THE NEAREST SENSITIVE RECEPTOR, HUMAN PERCEPTION

Equipment	RMS in decibels (VdB) at Residences (50 feet from vibration Source)	Perception Threshold (RMS in decibels (VdB) at Residences)	Exceeds Perception Threshold
Pile driving (impact)	97.98	65.00	Yes
Pile driving (sonic)	86.98	65.00	Yes
Caisson drilling	80.98	65.00	Yes
Large bulldozer	80.98	65.00	Yes
Loaded trucks	79.98	65.00	Yes

Tier I

As shown in Table 3.8.4.3-2, proposed project construction activities would potentially result in PPV levels that exceed the FTA's criteria for vibration induced structural damage at residences 50 feet from the proposed project site if impact pile driving was utilized. Therefore, implementation of the proposed project would potentially result in significant impacts from generation of groundborne vibration (specifically as a result of construction-related activities that require pile driving), thus requiring the consideration of mitigation measures.

In addition, as shown in Table 3.8.4.3-3, proposed project construction activities would be likely to result in RMS levels that would be perceptible. While construction activities would be limited to daytime hours and would be infrequent, they would still be considered significant.

Tier II

As shown in Table 3.8.4.3-2, proposed project construction activities would potentially result in PPV levels that exceed the FTA's criteria for vibration induced structural damage at residences 50 feet from the proposed project site if impact pile driving was utilized. Therefore, implementation of the proposed project would potentially result in significant impacts from generation of groundborne vibration (specifically as a result of construction related activities that require pile driving), thus requiring the consideration of mitigation measures.

In addition, as shown in Table 3.8.4.3-3, proposed project construction activities would be likely to result in RMS levels that would be perceptible. However, construction activities would be limited to daytime hours and would be infrequent in duration. Therefore, while construction activities would be expected to result in perceptible vibration levels it is not expected that vibration levels would result in a significant impact.

Airports and Airport Land Use Plans

Tier I

Implementation of Tier I of the proposed project would not result in significant impacts from airports or the implementation of airport land use plans. The proposed project site is neither located within 2 miles of a public or private airstrip nor is it located within an airport land use plan. The nearest airport, the Compton/Woodley Airport, is located approximately 2.1 miles south of the

proposed project site. The proposed project is relatively removed for the airport activities and would not result in significant impacts from the exposure of people residing or working in the project area to excessive noise levels caused by airports or the implementation of airport land use plans.

Tier II

Implementation of Tier II of the proposed project would not result in significant impacts from airports or the implementation of airport land use plans. The proposed project site is neither located within 2 miles of a public or private airstrip nor is it located within an airport land use plan. The nearest airport, the Compton/Woodley Airport, is located approximately 2.1 miles south of the proposed project site. The proposed project is relatively removed for the airport activities and would not result in significant impacts from the exposure of people residing or working in the project area to excessive noise levels caused by airports or the implementation of airport land use plans.

Private Airstrips

Tier I

Implementation of Tier I of the proposed project would not result in significant impacts from private airstrips. The proposed project would not be located near a private airstrip. The closest private airstrip is located more than 11 miles from the proposed project site. Therefore, the proposed project would not result in significant impacts from the exposure of people residing or working in the project area to excessive noise levels caused by private airstrips.

Tier II

Implementation of Tier II the proposed project would not result in significant impacts from private airstrips. The proposed project would not be located near a private airstrip. The closest private airstrip is located more than 11 miles from the proposed project site. Therefore, the proposed project would not result in significant impacts from the exposure of people residing or working in the project area to excessive noise levels caused by private airstrips.

3.8.4.4 Cumulative Impacts

The incremental impact of the proposed project, when added to the related past, present, or reasonably foreseeable, probable future projects listed in Section 2.0, *Project Description*, would not be expected to result in cumulative impacts from noise.

Tier I

If construction of the proposed project were to coincide with construction of nearby related projects, it would potentially result in increases in noise levels at nearby sensitive receptors beyond the proposed project considered in isolation. Two related projects, MLK Campus Improvements and South Public Health Clinic (Table 2.6-1), are close enough to the proposed project that, if construction of the proposed project were to occur simultaneously with construction of the related project, the resulting noise levels could result in a cumulative noise level greater than either project in isolation. The MLK Campus Improvements project is within the proposed project site and the South Public Health Clinic project is located 0.2 mile from the proposed project site. The

cumulative increase in noise levels of the MLK Campus Improvements project with the proposed project, as the MLK Campus Improvements project is located within the proposed project, if the two projects were to occur simultaneously, the increase in noise levels would be similar to those of multiple phases of construction occurring simultaneously and as discussed earlier would be negligible. Cumulative noise levels at a sensitive receptor would be the highest relative to one project in isolation, when the sensitive receptor is in close proximity to both projects. The sensitive receptor that is nearest to the South Public Health Clinic while also being in close proximity to the proposed project is a residence, located is 205 feet from the South Public Health Clinic and170 feet from the proposed project. The noise level at this residence during the loudest phase of construction of the proposed project in isolation would be 63.4 dBA. The noise level at this residence during the loudest phase of construction of the South Public Health Clinic in isolation would be 61.7 dBA. If the loudest phase of construction of the proposed project were to occur at the closest point within the proposed project site to the residence simultaneously with the loudest phase of construction of the South Public Health Clinic at the closest point to the residence, the resulting noise level at the residence would be 65.6 dBA. 65.6 dBA is below the 75 dBA threshold of significance for construction noise at residences. Therefore, the proposed project would not result in a cumulative noise increase during construction. In addition, the mitigation measures considered to reduce the construction noise levels would also reduce the proposed project's contribution to potential cumulative construction noise.

When determining the significance of the noise levels from increased traffic, the anticipated traffic volumes at intersection in the vicinity of the proposed project in 2020 were based on estimated future volumes of traffic from ambient growth. Therefore, the cumulative increase in future traffic noise levels at proposed project build-out, with future ambient growth relative to the existing baseline, were considered in the earlier discussion of traffic noise impacts and were found to be below the level of significance. The mechanical systems of the proposed project would not be expected to be audible to the north, east, and west of the proposed project because ambient noise levels, primarily due to automobile traffic, would be sufficiently high that mechanical noise would not be perceptible. As discussed earlier, mechanical systems would potentially result in significant noise impacts at residences to the south of the proposed project site because of lower ambient noise levels in this area. However, the mechanical noise levels would only be audible at those residences nearest to the proposed project site in the event that there are significant deviations from the existing campus layout and setbacks and as none of the related projects occur in close proximity to these residences, it not expected that mechanical noise from the proposed project would contribute to cumulative noise impacts.

Tier II

Cumulative construction noise impacts for Tier II would potentially increase in noise levels. However, with the consideration of mitigation measures, the cumulative construction noise impacts would be reduced.

When determining the significance of the noise levels from increased traffic, the anticipated traffic volumes at intersection in the vicinity of the proposed project in 2020 were based on estimated future volumes of traffic from ambient growth. Therefore, the cumulative increase in future traffic noise levels at proposed project build-out, with future ambient growth relative to the existing baseline, were considered in the earlier discussion of traffic noise impacts and were found to be below the level of significance. The mechanical systems of the proposed project would not be expected to be audible to the north, east, and west of the proposed project because ambient noise levels, primarily due to automobile traffic, would be sufficiently high that mechanical noise would

not be perceptible. As discussed earlier, mechanical systems would potentially result in significant noise impacts at residences to the south of the proposed project site because of lower ambient noise levels in this area. However, the mechanical noise levels would only be audible at those residences nearest to the proposed project site in the event that there are significant deviations from the existing campus layout and setbacks and as none of the related projects occur in close proximity to these residences, it not expected that mechanical noise from the proposed project would contribute to cumulative noise impacts.

3.8.5 Mitigation Measures

The mitigation measures below shall be implemented for the construction and operation activities related to the proposed project.

Tier I

Measure Noise-1

The County of Los Angeles shall require that the plans and specifications require that construction equipment be equipped with state-of-the-art noise-muffling devices. Barriers or curtains shall be required to be installed close to equipment to shield the equipment from the receptor. Barriers or curtains utilized at the project site shall be required to reduce A-weighted construction noise levels at nearby sensitive receptors by a minimum of 10 dB. The height and length of the barriers or curtains shall be determined based on location of construction activity and receptor.

Because of the close proximity of the source and receptors, the noise impact would be dependent on the location of the noise sources. Prior to the start of demolition and construction, the contractor shall develop a noise control plan based on the actual equipment that will be used during demolition and construction, and the location of various demolition and construction activities. If the actual equipment noise levels are not available, equipment noises shall be measured in the field. The noise control plan shall predict the noise levels with actual equipment and with barriers or curtains in place. In addition, the plan shall take into account the demolition and equipment mix that would be operated at the same time. Equipment mix and/or the number of equipment operating shall be considered in reducing the noise levels.

Measure Noise-2

Prior to the completion of final plans and specifications, the County of Los Angeles shall ensure that the plans and specifications include a requirement that all demolition and construction equipment be properly maintained. All vehicles and compressors shall utilize exhaust mufflers. Engine enclosure covers as designed by the manufacturer shall be in place at all times. The County of Los Angeles shall monitor the use of heavy equipment during all demolition and construction activities to ensure conformance with the requirements of properly maintained heavy equipment.

Measure Noise-3

The distance at which impact pile driving would not exceed a peak particle velocity of 0.2 inch per second at a residence would be 55 feet. Therefore, the County of Los Angeles shall require that impact pile driving not be utilized within 55 feet of a residential structure. Should pile driving be necessary within 55 feet of a residence, sonic pile driving shall be utilized.

Measure Noise-4

The County of Los Angeles shall ensure that mechanical noise generated by the project is less than 45 dBA at residences immediately south (approximately 50 feet) of the project. This shall be achieved by implementing one, or a combination of more than one of the following strategies: utilizing quiet mechanical systems; locating mechanical systems away from residences (mechanical systems that produce a noise level of 55 dBA at 50 feet would need to be located a minimum of 160 feet from residences to bring mechanical noise levels below 45 dBA at residences), or utilizing insulating screens to break the line-of-site between the mechanical systems and nearby residences.

Tier II

Measure Noise-1

The County of Los Angeles shall require that the plans and specifications require that construction equipment be equipped with state-of-the-art noise-muffling devices. Barriers or curtains shall be required to be installed close to equipment to shield the equipment from the receptor. Barriers or curtains utilized at the project site shall be required to reduce A-weighted construction noise levels at nearby sensitive receptors by a minimum of 10 dB or to the maximum extent possible. The height and length of the barriers or curtains shall be determined based on the location of the construction activity and receptor.

Because of the close proximity of the source and receptors, the noise impact would be dependent on the location of the noise sources. Prior to the start of demolition and construction, the contractor shall develop a noise control plan based on the actual equipment that will be used during demolition and construction, and the location of various demolition and construction activities. If the actual equipment noise levels are not available, equipment noises shall be measured in the field. The noise control plan shall predict the noise levels with actual equipment and with barriers or curtains in place. In addition, the plan shall take into account the demolition and equipment mix that would be operated at the same time. Equipment mix and/or the number of equipment operating shall be considered in reducing the noise levels.

Measure Noise-2

Prior to the completion of final plans and specifications, the County of Los Angeles shall ensure that the plans and specifications include a requirement that all demolition and construction equipment be properly maintained. All vehicles and compressors shall utilize exhaust mufflers. Engine enclosure covers as designed by the manufacturer shall be in place at all times. The County of Los Angeles shall monitor the use of heavy equipment during all demolition and construction activities to ensure conformance with the requirements of properly maintained heavy equipment.

Measure Noise-3

The distance at which impact pile driving would not exceed a peak particle velocity of 0.2 inch per second at a residence would be 55 feet. Therefore, the County of Los Angeles shall require that impact pile driving not be utilized within 55 feet of a residential structure. Should pile driving be necessary within 55 feet of a residence, sonic pile driving shall be utilized.

Measure Noise-4

The County of Los Angeles shall ensure that mechanical noise generated by the project is less than 45 dBA at residences immediately south (approximately 50 feet) of the project. This shall be achieved by implementing one, or a combination of more than one of the following strategies: utilizing quiet mechanical systems; locating mechanical systems away from residences (mechanical systems that produce a noise level of 55 dBA at 50 feet would need to be located a minimum of 160 feet from residences to bring mechanical noise levels below 45 dBA at residences), or utilizing insulating screens to break the line-of-site between the mechanical systems and nearby residences.

3.8.6 Level of Significance after Mitigation

Implementation of mitigation measure Noise-1 and Noise-2 would reduce construction-related noise levels by a minimum of 10 dB. Based on the mitigated construction noise levels, the distance at which impacts would be below the level of significance is predicted. This distance is then compared to the nearest noise receptor distance. Since noise sources are not stationary, this approach is used rather than predicting the noise levels at the nearest receptor. If the distance to the nearest noise receptor is more than the "distance at which impact will occur" then there would be no negative impact. The results are presented in Table 3.8.6-1, *Distance at which Mitigated Construction Noise Impacts would be Below the Level of Significance*.

TABLE 3.8.6-1
DISTANCE AT WHICH MITIGATED CONSTRUCTION NOISE IMPACTS WOULD BE BELOW THE LEVEL OF SIGNIFICANCE

Construction Phase	Distance at which Impact would be Below the Level of Significance at Respective Land Use*
	Residential (75 dBA)
Ground clearing	45 feet
Excavations	80 feet
Foundations	23 feet
Erection of structures	50 feet
Finishing (i.e., paving)	80 feet
Actual distance to nearest noise receptor	East (across Wilmington Avenue: 100 ft South (across 122nd Street): 50 ft West (across Compton Avenue): 90 ft

NOTE:
* Noise levels will vary depending on the location of the construction activities on the site.

Tier I

As shown in Table 3.8.6-1, the distance from the proposed project site at which impacts to affected residential structures would be below the level of significance is 80 feet. The nearest residential land use is approximately 50 feet south of the proposed project. Implementation of mitigation measures Noise-1 and Noise-2 would reduce construction noise at residential properties to the east and west of the campus to below the level of significance; however, construction noise levels would exceed the 75 dBA permissible level at residences south of the proposed project site that are within 80 feet of the proposed project property. Therefore, noise impacts from construction, while temporary, would remain significant and unavoidable.

Implementation of mitigation measure Noise-3 would reduce significant impacts related to potential building damage from vibration during construction to below the level of significance. However, vibration levels would still be perceptible at sensitive receptors; therefore, vibration levels during construction of the proposed project would result in a significant and unavoidable impact.

Implementation of mitigation measure Noise-4 would reduce significant impacts related to mechanical noise to below the level of significance.

Tier II

As shown in Table 3.8.6-1, the distance from the proposed project site at which impacts to affected residential structures would be below the level of significance is 80 feet. The nearest residential land use is approximately 50 feet south of the proposed project. Implementation of mitigation measures Noise-1 and Noise-2 would reduce construction noise at residential properties to the east and west of the campus to below the level of significance; however, construction noise levels would exceed the 75 dBA permissible level at residences south of the proposed project site that are within 80 feet of the proposed project property. Therefore, noise impacts from construction, while temporary, would remain significant and unavoidable.

Implementation of mitigation measure Noise-3 would reduce significant impacts related to potential building damage from vibration during construction to below the level of significance. However, vibration levels would still be perceptible at sensitive receptors; therefore, vibration levels during construction of the proposed project would result in a significant and unavoidable impact.

Implementation of mitigation measure Noise-4 would reduce significant impacts related to mechanical noise to below the level of significance.

3.9 POPULATION AND HOUSING

As a result of the Initial Study, the County of Los Angeles (County) determined that the Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in impacts to population and housing.[1] Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potentially significant impacts to population and housing.

The analysis of population and housing consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing and projected population and housing conditions at the proposed project area, thresholds for determining if the project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. Population and housing at the proposed project site were evaluated with regard to state, regional and local data and forecasts.[2]

3.9.1 Regulatory Framework

State

California Housing Element Law

The California Housing Element Law, enacted in 1969, is implemented by the California Department of Housing and Community Development (HCD), one of 13 departments within the California Business, Transportation and Housing Agency. The HCD is responsible for reviewing local government housing elements for compliance with State law and providing written comments to the local government. Using the information provided by local government in its housing element, the HCD determines the regional housing need for each county and allocates funding to meet this need to the council of governments for distribution to its jurisdictions. The HCD also oversees distribution of the regional housing need by the council of governments (also known as Metropolitan Planning Organizations, or MPOs) to the local governments to ensure that funds are appropriately allocated.

Senate Bill 491

Senate Bill 491, amended in 2003, states that each local government must review its housing element frequently to evaluate the appropriateness of the housing goals, objectives, and policies, effectiveness of the housing element, and progress of the city, county, or city and count in implementing the housing element. The local government's review and revisions of the housing element must consider any low or moderate income housing provided or required.

[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc. Pasadena, CA.

[2] Southern California Association of Governments and U.S. Census Data were used and forecasts for population and housing.

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) region is comprised of six counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura and totals approximately 38,000 square miles in area. SCAG is the federally designated MPO under Title 23, United States Code (USC) 134(d)(1), for the six-county region. The region is home to a population of over 18 million people and is expected to grow to 24 million by 2035.[3]

SCAG is responsible for various regional planning and reporting functions. To plan and measure progress toward achieving regional planning goals and objectives, SCAG prepares the Regional Comprehensive Plan (RCP), the Southern California Compass Growth Vision, the Regional Housing Needs Assessment (RHNA), the RTP, the RTIP, and annual State of the Region reports. As part of these responsibilities, SCAG produces population, housing, and employment projections as well as other socioeconomic forecasts. Consistency with the growth forecast, at the subregional level, is one criterion that SCAG uses in exercising its federal mandate to review "regionally significant" development projects for conformity with regional plans. SCAG's current forecast is the one prepared for the 2008 RTP (2012 forecast), which utilizes Census data as a baseline. The proposed project site is located within the Gateway Cities Subregions, one of eight subregions in Los Angeles County.[4]

Regional Transportation Plan

SCAG is required by state and federal mandates to prepare a Regional Transportation Plan (RTP) every four years among various other documents. The 2008 RTP is a long-range regional transportation plan that provides a blueprint to help achieve a coordinated and balanced regional transportation system.[5] The RTP includes a description of regional growth trends to help identify future needs for travel and goods movement.

Regional Comprehensive Plan (2008)

Local governments are encouraged by SCAG to use the RCP as the basis for their own plans and are required to discuss the consistency between the RCP and proposed development projects that are deemed to be of "regional significance."[6] The criteria for regionally significant projects includes proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space and a commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space. Although the proposed project would provide a mix of land uses, given the size of the proposed

[3] Southern California Association of Governments. 2008. *2008 Regional Transportation Plan Addendum*. Available at: http://www.scag.ca.gov/RTPpeir2008/final/addendum.htm

[4] Southern California Association of Governments. Accessed 8 June 2010. *Regional Transportation Plan 2012 Growth Forecasts*. Available at: http://www.scag.ca.gov/forecast/downloads/excel/RTP2012-GROWTH-FORECAST.xls

[5] Southern California Association of Governments. 2008. *2008 Regional Transportation Plan Addendum*. Available at: http://www.scag.ca.gov/RTPpeir2008/final/addendum.htm

[6] The CEQA definition of projects of regional significance is combined with projects of statewide and area wide significance (Section 15206(b)). SCAG's criteria for regionally significant projects has combine the CEQA Section 15206(b) criteria with additional criteria to include projects that directly relate to the policies and strategies contained in the Regional Comprehensive Plan and the Regional Transportation Plan. Southern California Association of Governments (SCAG). June 25, 2010. Criteria List. http://www.scag.ca.gov/igr/clist.htm.

project, it is presumed to of equivalent size to at least one of the criteria and is therefore considered of regional significance. The RCP is closely tied to both SCAG's Compass Blueprint and the RTP. The RCP incorporates the recommendations from the 2008 RTP and also clarifies the need for further action, such as refinement of the Compass Blueprint program to achieve regional consensus, to achieve this Plan's goals.[7] The purpose of the 2008 RCP is to collect and disseminate regional policies. The nine areas covered in the RCP are land use and housing, open space and habitat, water, energy, air quality, solid, transportation, security and emergency preparedness, and economy. Growth projections contained in the RCP are based on a compilation of county and local projections. RCP forecasts are then used in the formulation of regional plans dealing with regional air quality, housing, transportation and traffic, and other infrastructure issues.

Regional Housing Needs Assessment

SCAG's RHNA is a key tool for its member governments to plan for growth. Various cities (including areas within the unincorporated County of Los Angeles, such as the proposed project; as well as other areas within the County, and the Counties of Imperial, Orange, Riverside, San Bernardino, and Ventura) are designated in SCAG's RHNA.[8] The most recent RHNA was approved by the SCAG Regional Council in July 2007 and quantifies the need for housing within each jurisdiction for specific planning periods. The current planning period is January 1, 2006 to June 30, 2014.[9] Each member government (i.e., city, county) must plan, consider, and decide how they will address this housing need through the process of completing the housing elements of their general plans. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that they can grow in ways that enhance the quality of life but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity, fair share housing needs.[10] The RHNA is produced by SCAG, as mandated by state law, to coincide with the region's schedule for preparing housing elements. The existing housing needs assessment is based on data from the most recent U.S. Census to measure ways in which the housing market is not meeting the needs of current residents. Of the six jurisdictions assessed in the RHNA, only the unincorporated County of Los Angeles will be reviewed for this analysis.

Compass Growth Vision Report[11]

The SCAG Southern California Compass Growth Vision Report (Compass Growth Vision), published in June 2004, presents a comprehensive growth vision for the six-county SCAG region, as well as achievements in the process of developing the growth vision. The Compass Growth Vision Report notes that population and household growth trends, and existing housing conditions point to an unmet demand for a greater diversity of housing throughout the six-county region.

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[7] Southern California Association of Governments.2008. *Regional Comprehensive Plan*. Available at: http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf

[8] Southern California Association of Governments. Accessed 8 June 2010. *Regional Housing Needs Assessment*. Available at: http://www.scag.ca.gov/housing/rhna/index.htm

[9] Southern California Association of Governments. Accessed 8 June 2010. *Regional Housing Needs Assessment*. Available at: http://www.scag.ca.gov/housing/rhna/index.htm

[10] Southern California Association of Governments. Accessed 8 June 2010. *Regional Housing Needs Assessment*. Available at: http://www.scag.ca.gov/housing/rhna/index.htm

[11] Southern California Association of Governments. Accessed 29 June 2010. *Compass Growth Vision Report*. Available at: http://www.compassblueprint.org/files/scag-growthvision2004.pdf

The Compass Growth Vision represents a plan that, with only modest changes to development patterns, can point the region toward maintained and improved quality of life. The Compass Growth Vision process has included a technical analysis of growth options and values-based considerations that emerged from continued public participation.[12] The Compass Growth Vision is driven by four key principles:

1. Mobility: Getting where we want to go
2. Livability: Creating positive communities
3. Prosperity: Long-term health for the region
4. Sustainability: Promoting efficient use of natural resources.[13]

Compass Blueprint 2%Stragety. The Compass Blueprint 2% Strategy is a guideline for how and where the Compass Growth Vision Report[14] for Southern California's future can be implemented. The 2% Strategy calls for modest changes to current land use and transportation trends on only two percent of the land area of the region, known as the 2% Strategy Opportunity Areas.[15] The 2% Strategy Opportunity Areas are key areas of the SCAG region for targeting growth, where projects, plans and policies consistent with the Compass Blueprint principles will best serve the mobility, livability, prosperity and sustainability goals of the Growth Vision. The 2% Strategy Opportunity Areas are primarily comprised of metro center, city centers, rail transit stops, bus rapid transit corridors, airports, ports and industrial center, priority residential in-fill area and Compass Blueprint priority communities.[16] The Martin Luther King Jr. Medical Center is within the 2% Strategy Opportunities Area (City of Los Angeles South Map). The following principles from the Compass Blueprint Growth Vision and 2% Strategy pertain to the proposed project:

Principle 1: Improve mobility for all residents.

GV P1.1	Encourage transportation investments and land use decisions that are mutually supportive.
GV P1.2	Locate new housing near existing jobs and new jobs near existing housing.
GV P1.3	Encourage transit-oriented development.
GV P1.4	Promote a variety of travel choices.

Principle 2: Foster livability in all communities.

GV P2.1	Promote infill development and redevelopment to revitalize existing communities.
GV P2.2	Promote developments, which provide a mix of uses.
GV P2.3	Promote "people scaled," walkable communities.
GV P2.4	Support the preservation of stable, single-family neighborhoods.

[12] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, 2% Strategy." Available at: http://www.compassblueprint.org/about/strategy

[13] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, 2% Strategy." Available at: http://www.compassblueprint.org/about/strategy

[14] Adopted by SCAG's Regional Council in June 2004.

[15] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, 2% Strategy." Available at: http://www.compassblueprint.org/about/strategy

[16] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, Opportunities Areas Maps." Available at: http://www.compassblueprint.org/opportunityareas

Principle 3: Enable prosperity for all people.

GV P3.1	Provide, in each community, a variety of housing types to meet the housing needs of all income levels.
GV P3.2	Support educational opportunities that promote balanced growth.
GV P3.3	Ensure environmental justice regardless of race, ethnicity, or income class.
GV P3.4	Support local and state fiscal policies that encourage balanced growth.
GV P3.5	Encourage civic engagement.

Principle 4: Promote sustainability for future generations.

GV P4.1	Preserve rural, agricultural, recreational, and environmentally sensitive areas.
GV P4.2	Focus development in urban centers and existing cities.
GV P4.3	Develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste.
GV P4.4	Utilize "green" development techniques.[17]

Local

County of Los Angeles General Plan

Housing Element (updated 2008)

The housing element of the County of Los Angeles General Plan (General Plan) includes general housing goals, strategies, and policies to meet the housing needs of the population in the County. The housing policies guide the County in making decisions related to housing issues (including the daily administration of the General Plan) and the public in understanding the general direction of the County's housing policies.[18]

Goal 1:	A wide range of housing types in sufficient supply to meet the needs of current and future residents, particularly persons with special needs, including but not limited to low income households, seniors, persons with disabilities, single-parent households, the homeless and at-risk homeless, and farm-workers.
Goal 2:	Sustainable communities with access to employment opportunities, community facilities and services, and other amenities.
Goal 3:	A housing supply that ranges broadly in housing costs to enable all households, regardless of income, to secure adequate housing.

[17] Southern California Association of Governments. Accessed 29 June 2010. *Compass Growth Vision Report*. Available at: http://www.compassblueprint.org/files/scag-growthvision2004.pdf

[18] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

Goal 4: A housing delivery system that provides assistance to low and moderate income households and those with special needs.

Goal 5: Neighborhoods that protect the health, safety, and welfare of the community, and enhance public and private efforts in maintaining, reinvesting in, and upgrading the existing housing supply.

Goal 6: An adequate supply of housing preserved and maintained in sound condition, located within safe and decent neighborhoods.

Goal 7: An affordable housing stock that is maintained for its long-term availability to low and moderate income households and those with special needs.

Goal 8: Accessibility to adequate housing for all persons without discrimination in accordance with Federal and State fair housing laws.

Goal 9: Planning for and monitoring the long-term affordability of sound, quality housing.

Land Use Element

The Land Use element of the General Plan describes the needs, goals, and policies the County must maintain to use land efficiently, ensure compatibility of development, conserve resources and enhance environmental quality, improve the land use decision making process, and improve inter-agency coordination in land use planning.[19]

Goal 1: Divergent trends toward decentralization of uses in urban fringe areas and concentration of uses in established urban communities require increased efforts to ensure that new development will be compatible with the natural and manmade environment.

Goal 2: The manner in which land use decisions are made must address cumulative social, economic and environmental effects, and ensure opportunity for citizen participation.

3.9.2 Existing Conditions

This subsection summarizes the current estimates, trends, and characteristics of the population and housing in the unincorporated area of Los Angeles County.

Population Trends

Since the 1990 Census, the Southern California region has grown from 14.6 million to 16.5 million, an increase of approximately 12.8 percent. During this timeframe, Los Angeles County grew by 7.4 percent; however, in absolute numbers the County's growth was the highest increase of any county in

[19] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

the state.[20] In 2000, the SCAG region had a population of approximately 16,516,000.[21] SCAG forecasts that the population for its six-county region will increase by six million between 2004 and 2030.[22] The proposed project is located within unincorporated Los Angeles County within the community of Willowbrook. In 1990, the population of the Willowbrook community was 32,772, which reflected a population growth of approximately 1,400 persons since 1990 and 2000, as compared to the County of Los Angeles' approximate one million person increase from 8,863,164 in 1990 to 9,519,338 in 2000. Table 3.9.2-1 *Population Trends by County, Region, and Community*, illustrates the population trends and growth for the SCAG region, the County, and the Willowbrook community.

TABLE 3.9.2-1
POPULATION TRENDS BY COUNTY, REGION, AND COMMUNITY

	2000 Census (Persons)	2007 (or 2006 - 2008 annual average)* (Persons)	Increase	Percent Growth (2000-2007*
Population				
SCAG Region	16,516,000[23]	18,600,000[24,25]	2,084,000	12.6%
County of Los Angeles	9,519,338[26]	9,832,137[27]	312,799	3.2%
Willowbrook Community[28]	34,138	34,215	77	0.23%

SOURCE: SCAG, County of Los Angeles, U.S. Census 2000, 2006-2008 (see footnotes for specific references).
*SCAG does not provide a 2006-2008 average; rather, SCAG data is based on 2007 and a 2000-2007 percent growth.

As displayed in Table 3.9.2-1, the Willowbrook community experienced very little growth between 2000 and 2007. The County as a whole experienced a population increase of approximately three percent. An increase was also reflected in the unincorporated portions of the County. The total population in the unincorporated areas of the County (which includes the community of Willowbrook) increased by approximately 106,000, (from 2000 to 2007), an increase of approximately 0.11 percent, reaching a total population of 1,092,078.[29]

[20] Southern California Association of Governments. Accessed 7 June 2010. Census Data. Available at: http://www.scag.ca.gov/census/index.htm

[21] Southern California Association of Governments. Accessed 7 June 2010. Census Data. Available at: http://www.scag.ca.gov/census/pdf/regionweb.pdf

[22] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, 2% Strategy." Available at: http://www.compassblueprint.org/about/strategy

[23] Southern California Association of Governments. Accessed 7 June 2010. Census Data—A Century of Growth. Available at: http://www.scag.ca.gov/census/pdf/regionweb.pdf

[24] Southern California Association of Governments. 2008. *Regional Transportation Plan, Executive Summary*. Available at: http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/f2008RTP_ExecSum.pdf

[25] According to the 2008 RTP, SCAG's population is based on the population in 2007.

[26] U.S. Census 2000. Los Angeles County. Accessed 4 June 2010. Available at: www.factfinder.census,gov

[27] U.S. Census 2006-2008. Los Angeles County. Accessed 4 June 2010. Available at: www.factfinder.census,gov

[28] U.S. Census Bureau, American Fact Finder, Willowbrook Community CDP, 2000. Accessed 4 June 2010. Available at: http://factfinder.census.gov/servlet/

[29] Southern California Association of Governments. May 2009. Profile of the County of Los Angeles, Statistical Data (Population 2008). Available at: http://www.scag.ca.gov/resources/pdfs/Counties/LosAngelesCounty.pdf

Housing Trends

This subsection summarizes the current housing context for the region and the project area. The housing inventory on the SCAG regional level has increased between 2000 and 2007, bringing the regional housing stock from approximately 5,390,000 million dwelling units to approximately 5.8 million dwelling units, a relatively modest increase of 0.08 percent.[30] According to SCAG data, the region's population density rose from 2.94 average persons per unit in 1990 to 3.07 in 2000. The average person per household ratio in the SCAG region has also increased from 3.07 in 2000 to 3.19 in 2007. The growing population is reflected mostly in larger households rather than in the formation of new households.[31]

As indicated above, SCAG's RHNA is an assessment process performed periodically as part of Housing element and General Plan updates at the local level. The RHNA quantifies the need for housing by income group within each of six-county Southern California regions (as listed earlier in this section) during specific planning periods. The current planning period is January 1, 2006 to June 30, 2014.[32] Table 3.9.2-2, *SCAG RHNA Anticipated Housing Need By Income Bracket for Unincorporated Los Angeles County*, provides SCAG's RHNA by income for the unincorporated areas of Los Angeles County for the period of January 2006 through June 2014.

TABLE 3.9.2-2
SCAG RHNA ANTICIPATED HOUSING NEED BY INCOME BRACKET FOR UNINCORPORATED LOS ANGELES COUNTY

	Very Low Income Households (%)	Low Income Households (%)	Moderate Income Households (%)	Above Moderate Income Households (%)	Total (%)
SCAG RHNA County of Los Angeles (unincorporated)	25.2	15.9	17.2	41.7	100 %

SOURCE: SCAG, Regional Housing Need Allocation Plan, July 12, 2007.

Table 3.9.2-3, *SCAG RHNA Household Need Allocations by Income Bracket for Unincorporated Los Angeles County*, provides SCAG's projection of the number of households by income bracket for the unincorporated areas of Los Angeles County for the period of January 2006 through June 2014.

[30] Southern California Association of Governments. 2008. *Regional Transportation Plan, Percent Growth in Population by County 2000-2007*. Available at: http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/f2008RTP_Complete.pdf

[31] Southern California Association of Governments. 2008. *Regional Transportation Plan, Percent Growth in Population by County 2000-2007*. Available at: http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/f2008RTP_Complete.pdf

[32] Southern California Association of Governments. 4 June 2010. Regional Housing Needs Assessment Fact Sheet. Available at: http://www.scag.ca.gov/factsheets/pdf/2009/SCAG_RHNA_Factsheet_0509.pdf

TABLE 3.9.2-3
SCAG RHNA HOUSEHOLD NEED ALLOCATIONS BY INCOME BRACKET FOR UNINCORPORATED LOS ANGELES COUNTY

	Number Of Very Low Income Households	Number Of Low Income Households	Number Of Moderate Income Households	Number Above Moderate Income Households	Total
SCAG RHNA[33] County of Los Angeles (unincorporated)	14,425	9,073	9,816	23,862	57,176

SOURCE: SCAG, Regional Housing Need Allocation Plan, July 12, 2007.

SCAG projections indicate that the unincorporated areas of Los Angles County (which includes the Willowbrook community) will increase its housing stock. The proposed project (Tier II) includes up to 100 residential units. This proposed growth, which is small, is within SCAG projections.

Since 2000, there has been an increase in the County-wide housing stock; however, this increase was not reflected in the Willowbrook community's housing inventory, demonstrating that the community is for the most part built out. In fact, a slight decrease in housing units occurred (Table 3.9.2-4, *Housing Trends and Population for Los Angeles County*).

TABLE 3.9.2-4
HOUSING TRENDS AND POPULATION FOR LOS ANGELES COUNTY

	2000 Census (dwelling units)	Increase (2000-2007) (dwelling units)	Percent Growth (2000-2007)	2007 (or 2006 - 2008 annual average)* (Persons)
County of Los Angeles	3,270,909	101,467	3.1%	3,372,376
Willowbrook Community[34]	9,042	(183)	(2%)	8,859

SOURCE:
U.S. Census 2000, 2006-2008.
NOTE:
*SCAG does not provide a 2006-2008 average; rather, SCAG data is based on 2007 and a 2000-2007 percent growth.

The unincorporated areas of the County also experienced an increase in housing stock between 2000 and 2008. The total number of households in the unincorporated area of the County increased by approximately 16,500 units, or 5.9 percent.[35] Although the housing stock did not mirror the increase observed in the housing stock for the County as a whole, the household size for the community of Willowbrook is larger than the County. Between 2006 and 2008, the average household size in the

[33] SCAG's projections are based on the planning period of January 2006 though June 2014.

[34] U.S. Census Bureau. American Fact Finder, Willowbrook Community CDP, 2006-2008. Accessed 4 June 2010. Available at: http://factfinder.census.gov/servlet/

[35] Southern California Association of Governments. Accessed 7 June 2010. Profile of the County of Los Angeles, Statistical Data (Population 2008). Available at: http://www.scag.ca.gov/resources/pdfs/Counties/LosAngelesCounty.pdf

unincorporated area of the Willowbrook community was 4.10 persons per household, while the County's was 3.04 per household.[36]

Community Profile

The proposed project is located within the Willowbrook community. In the WIllowbrook community, the median household income for families was approximately $34,601 between 2006 and 2008, which was lower than the $55,192[37] median household income for families in the County during the same timeframe. Of the population living in Willowbrook, 25.8 percent of people fall below the poverty line as opposed to roughly 15.1 percent living in the County as a whole and 13.2 percent nationally. [38]

Between 2003 and 2006, the number of professional and management jobs within the County increased by approximately 2,600 and increased 1.2 percent between 2006 and 2008.[39] In 2008, the education and health employment sector remained the largest sector, accounting for approximately 26 percent of total jobs in the unincorporated area of the County.[40] Other large employment sectors included manufacturing (approximately 11 percent), leisure and hospitality (approximately 10 percent), and professional management (approximately 11 percent).[41]

In 2008, the total jobs in the unincorporated areas of Los Angeles County reached approximately 304,558, about 2.4 percent greater than its 2003 level.[42] The job growth rate in the unincorporated areas was the same percent as the growth rate as in Los Angeles County. Between 2003 and 2006, the number of retail trade jobs in the unincorporated area of the County increased from 25,496 to 27,029, approximately six percent.[43] However, between 2006 and 2008 there was a contraction in retail sales that reduced the total retail employment within the County by approximately 1.4 percent.

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[36] U.S. Census 2000. April 2010. Web site. "Population Finder." Available at: http://factfinder.census.gov/

[37] U.S. Census Bureau. Accessed 11 June 2010. American Fact Finder, Los Angeles County, 2006-2008. Available at: http://factfinder.census.gov/servlet/

[38] U.S. Census Bureau. Accessed 11 June 2010. American Fact Finder, Los Angeles County, 2006-2008. Available at: http://factfinder.census.gov/servlet/

[39] Southern California Association of Governments. May 2009. Profile of the County of Los Angeles, Statistical Data (Population 2008). Available at: http://www.scag.ca.gov/resources/pdfs/Counties/LosAngelesCounty.pdf

[40] Southern California Association of Governments. May 2009. Profile of the County of Los Angeles, Statistical Data (Population 2008). Available at: http://www.scag.ca.gov/resources/pdfs/Counties/LosAngelesCounty.pdf

[41] Southern California Association of Governments. May 2009. Profile of the County of Los Angeles, Statistical Data (Population 2008). Available at: http://www.scag.ca.gov/resources/pdfs/Counties/LosAngelesCounty.pdf

[42] Employment data is based on the California Employment Development Department (EDD) county totals and is adjusted by SCAG.

[43] Southern California Association of Governments. May 2009. Profile of the County of Los Angeles, Statistical Data (Population 2008). Available at: http://www.scag.ca.gov/resources/pdfs/Counties/LosAngelesCounty.pdf

Population, Housing and Employment Projections

This subsection summarizes the projections for population, households and employment for the unincorporated area of the County of Los Angeles. SCAG, under the Community Development Division, Planning and Policy Department, is responsible for producing socioeconomic projections and developing, refining and maintaining the SCAG regional and small area forecasting models. Historically, in the SCAG region as a whole, the professional business services and education and health services fields are work sectors that have experienced increased growth between 2000 and 2005 [Table 3.9.2-5, *Employment Trends in the Professional Business Services and Education and Health Services Sectors for the Gateway Cities Subregion (2000 and 2005)*].

TABLE 3.9.2-5
EMPLOYMENT TRENDS IN THE PROFESSIONAL BUSINESS SERVICES AND EDUCATION AND HEALTH SERVICES SECTORS FOR THE GATEWAY CITIES SUBREGION (2000 AND 2005)

Sector	2000 Jobs		2005 Jobs		Change in Jobs (2000 to 2005)	
	Number in Sector	Percent of Total SCAG Employment Base	Number in Sector	Percent of Total SCAG Employment Base	Increase in Number of Jobs	Percent Increase
Professional and Business Services	1,167,000	16%	1,197,000	15%	30,000	3%
Education and Health Services	1,429,000	19%	1,546,000	20%	117,000	8%

SOURCE: California Employment Development Department/ SCAG Employment Estimates (SCAG, 2008 RTP).

As stated above, the proposed project is located in the Gateway Cities Subregion. Table 3.9.2-6, *Population, Households, and Jobs Projections for the Gateway Cities Subregion (2008 to 2035)*, provides SCAG's forecasts for population, housing and employment for the unincorporated Gateway Cities Subregion of Los Angeles County[44]

[44] Southern California Association of Governments. 2008. Integrated Growth Forecast. Available at: http://www.scag.ca.gov/forecast/downloads/excel/RTP07_CityLevel.xls

TABLE 3.9.2-6
POPULATION, HOUSEHOLDS, AND JOBS PROJECTIONS FOR THE GATEWAY CITIES SUBREGION (2008 TO 2035)[45]

	2008	2020	2035	2008-2020 change	2008-2020 percent change	2008-2035 change	2008-2035 percent change
Population	362,310	373,404	440,893	11,094	3%	78,583	22%
Households	87,562	89,774	110,366	2,212	2.5%	22,804	26%
Employment	76,543	77,308	85,039	765	0.9%	8,496	11%

SOURCE: SCAG, RTP 2012 Growth Forecasts, 2008.

As shown in Table 3.9.2-6 above, SCAG projects that the unincorporated Gateway Cities (proposed project area) 2035 population will increase to 440,893 (22.0 percent); the number of households will increase to 110,366 (26.0 percent); and the total number of job will increase to 85,039 (11.0 percent).

3.9.3 Significance Thresholds

The potential for the proposed project to result in impacts related to population and housing was analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines. The project would normally be considered to have a significant impact to population and housing when the potential for any one of the following three thresholds occurs:

- Inducement of substantial growth in an area, either directly or indirectly
- Displacement of substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere
- Displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere

The State CEQA Guidelines (Section 15131) states the following:[46]

> Economic or social effects of the project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes.

3.9.4 Impact Analysis

Population

Tier I

Tier I of the proposed project would not result in significant impacts to population displacement or unplanned population growth. The proposed project site currently contains the Martin Luther King, Jr.

[45] Southern California Association of Governments. Accessed 8 June 2010. Integrated Growth Forecast, RTP 2012 Growth Forecasts. Available at: http://www.scag.ca.gov/forecast/index.htm

[46] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

Medical Center Campus and contains no residential development. Therefore, no residents would be removed in order to construct Tier I of the proposed project. The proposed project would be developed on the existing campus, which is a medical facility. Tier I of the proposed development does not entail a residential element. Tier I of the proposed project would not displace any existing residents, nor necessitate the construction of replacement housing elsewhere. Therefore, both construction and operation of Tier I of the proposed project would have no impact with regard to population displacement or unplanned population growth.

Tier II

Tier II of the proposed project would not result in significant impacts to population displacement or unplanned population growth. The proposed project site currently contains the Martin Luther King, Jr. Medical Center Campus and contains no residential development. Therefore, no residents would be removed in order to construct Tier II of the proposed project. Tier II of the proposed project would be developed on the existing campus, which is a medical facility. Under Tier II proposed development, up to 100 residential units would be added to the campus. The proposed project would not displace any existing residents, nor necessitate the construction of replacement housing elsewhere. Therefore, both construction and operation of the proposed project would have no impact with regard to population displacement or unplanned population.

Whether a project's added development would directly induce a substantial population increase or housing growth is evaluated by whether the direct project-related growth could be accommodated within the appropriate population and housing projections. As shown in the analysis that follows, direct growth from the project's residential component falls within SCAG's projections for the unincorporated Gateway Cities Subregion, and would therefore not result in a significant impact with regard to substantial or unplanned population growth.

A project's population impacts are based on an analysis of the probable number of residents associated with the number of residential dwelling units planned in the project. The project's estimated population is then compared with official population growth forecasts for the unincorporated area of the County. In 2000, the Willowbrook Community, a census-designated place (CDP) in unincorporated Los Angeles County had an average of 3.97 persons per household. However, the average persons per household increased to 4.10 between 2006 and 2008.[47] Thus, the 100 residential units proposed under Tier II would be expected to generate approximately 410 individuals.[48]

As shown in Table 3.9.2-6, SCAG projects that the unincorporated Gateway Cities Subregion (the proposed project area) 2020 population will be approximately 373,404, an increase of 11,094 individuals from 2008. The proposed project's residential component would generate an estimated population increase of 410 persons, which represents approximately 0.1[49] percent of the forecasted population in 2020 and approximately 4 percent of the forecasted growth between 2008 and 2020.[50]

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[47] The 2006- 2008 estimates represent the average characteristics of population and housing between January 2006 and December 2008 and do no represent a single point in time.

[48] U.S. Census Bureau. Accessed 4 June 2010. American Fact Finder, 2006-2008 Willowbrook CDP. Available at: http://factfinder.census.gov/servlet/. This calculation is based on the following: the 100 residential units proposed is multiplied by 4.10 (average persons per dwelling unit in the Willowbrook Community), equal approximately 410 new residents).

[49] This calculation is based on the following: the 410 new residents are divided by 373,404 (the 2020 projected population).

[50] This calculation is based on the following: the 410 new residents are divided by 11,094 (the 2020 projected residential growth).

The proposed project's estimated population falls within the SCAG forecasted growth for the Gateway Cities Subregion, and represents a small percentage of that growth. Therefore, the proposed project would not result in a significant impact with regard to substantial or unplanned population growth.

Housing

Tier I

Tier I of the proposed project would not result in significant impacts to housing displacement or unplanned housing growth. The existing campus is currently a medical facility with no existing housing. The development of Tier I of the proposed project would not displace any existing housing nor would the proposed project necessitate the construction of replacement housing. Therefore, both construction and operation of Tier I of the proposed project would have no impact with regard to housing displacement or unplanned housing growth.

Tier II

Tier II of the proposed project would not result in significant impacts to housing displacement or unplanned housing growth. The existing campus is currently a medical facility with no existing housing. Tier II development of the proposed project would not displace any existing housing nor would the proposed project necessitate the construction of replacement housing. Therefore, both construction and operation of the proposed project would have no impact and no mitigation is necessary with regard to housing displacement.

Housing impacts are typically based on the number of new dwelling units planned within the proposed project, as compared to the housing projections. The scale of new housing under the Master Plan campus build-out in Tier II is then compared with applicable adopted SCAG household growth forecasts for the unincorporated area of Los Angeles County and other housing goals and policies in SCAG policy documents. The proposed project is consistent with SCAG's Compass Blueprint Growth Vision by locating new housing near existing jobs and new jobs near existing housing; creating a mix of uses; promoting redevelopment; and focusing growth along major transportation corridors, near a major transit station, with a variety of travel choices, and within a 2% Strategy area. There are two bus stations located on the existing campus boundary: one bus station is located on the northern boundary on 120th Street, and one bus station is located on the eastern boundary on Wilmington Avenue. In addition, the Metro Imperial/Wilmington/Rosa Parks Station, with both Metro blue line and green line access, is located approximately 0.5 mile northeast of the existing campus; the Metro station has a park and ride, as well as a shuttle bus that transports individuals to and from the Martin Luther King, Jr. Medical Center Campus. See Section 3.12, *Traffic and Transportation*, for additional details.

As illustrated in Table 3.9.2-5 above, SCAG projects that the unincorporated Gateway Cities Subregion (proposed project area) 2020 households will be approximately 89,774. The proposed project represents 0.0011[51] of the current SCAG forecast for 2020 and 0.05[52] of the forecasted household growth between 2008 and 2020. Given that the proposed project's residential units (households) are consistent with the SCAG forecast for the Gateway Cities Subregion and represents a small percentage of that growth, the proposed project would not induce a substantial or unplanned amount of housing

[51] This calculation is based on the following: the 100 residential units proposed are divided by the 89,774 (the 2020 households projected).

[52] This calculation is based on the following: the 100 residential units proposed are divided by the 2,212 (the 2020 projected household growth).

growth. The residential component of the proposed prospect would have a net benefit to the area because it would meet a portion of the forecasted need for the subregion and would not result in substantial or unplanned housing growth. Therefore, Tier II of the proposed project would not be expected to result in significant impacts with regard to housing displacement or unplanned housing growth.

Employment

Construction

Tier I

Tier I of the proposed project would not be anticipated to result in significant impacts with regard to an increase in resident population due to employment during construction. Direct but temporary increases in employment may occur during the construction phase of development projects. Construction employees would be required during the construction period of Tier I (development of the MACC building, Ancillary building, site improvements and support functions, etc.). It is anticipated that the labor force required to construct Tier I of the proposed project would either be filled by employees who live in the surrounding area or by people who would commute from their existing place of residence. As such, the need for construction workers would not result in workers relocating to the project area, particularly for a temporary construction assignment of short duration and Tier I of the proposed project would not be anticipated to result in an increase in resident population during construction.

Tier II

Tier II of the proposed project would not be anticipated to result in significant impacts with regard to an increase in resident population due to employment during construction. Direct but temporary increases in employment may occur during the construction phase of development projects. Construction employees would be required throughout the development in Tier II (mixed-use campus Master Plan development). Given the size of the employment base in Los Angeles County and the surrounding region, coupled with the current economic slow-down in construction, it is anticipated that construction jobs for the proposed project can be filled by employees who live in the surrounding area or by people who would commute from their existing place of residence. Further, construction work is specialized so that construction employees remain on-site only for the timeframe in which their specific skills are necessary to complete a particular phase of the construction process (i.e., site clearance, paving, painting, etc.). As such, the need for construction workers would not result in workers relocating to the project area, particularly for a temporary construction assignment of short duration. Thus, Tier II the proposed project would not be anticipated to result in a significant increase in resident population during construction.

Operation

Tier I

Tier I of the proposed project would not be anticipated to result in significant impacts with regard to an increase resident population due to employment during project operations. Operations of the Tier I component of the proposed project are anticipated to generate a small number of jobs in the medical field. Given the small number and type of jobs, substantial population impacts are not anticipated due to operation of the operation of Tier I of the proposed project. The new MACC building is a

replacement use. It is anticipated that the new MACC building may attract a few medical professionals residing within County of Los Angeles, while non-medical related jobs such as accounting, administration and food services could easily be filled by persons living in the area. However, some existing medical professional staff currently at the campus facility may transfer over to fulfill the positions given their institutional history with the hospital. Under Tier I, the existing campus staff would be moved from the existing MACC and other facilities that would be vacated and would be shifted into the new Tier I facilities. Operational impacts from the MACC building and associated uses would not increase employment. Tier I would be expected to generate approximately 150 temporary construction jobs and no new permanent or operational staff positions as Tier I. Thus, Tier I the proposed project would not be anticipated to result in a significant increase in resident population due to employment during operations.

Tier II

Tier II of the proposed project would not be anticipated to result in significant impacts with regard to an increase in resident population due to employment during project operations. During construction, Tier II development would be expected to generate approximately 400 temporary construction jobs that would vary according to the development phase that is occurring on the campus at any given time as described in the Tier II Construction Scenario in Section 2.0, *Project Description*, of this EIR and as it will be determined in the Master Plan. As with Tier I, this would not be expected to result in a significant impact. It is anticipated that development and staffing for construction would be staggered by phases over the course of the 10-year construction period.

During operation of Tier II of the proposed project, Tier II has the potential to result in a range of new permanent staff positions. Should the Tier II development be limited, no new jobs would be anticipated as a result of Tier II; however, Tier II development could also be estimated to create at least 100 jobs.[53]

Employees are less likely to relocate for jobs in the retail industry. There tends to be a higher turnover in retail jobs (many of the jobs are hourly, part time and/or filled by students or employees that would be expected to terminate employment over time to take on more complex or different jobs in the future). Given the small number and type of jobs, substantial population impacts are not anticipated due to operation of the commercial/ retail component of Tier II. The proposed commercial/retail uses are intended to serve the proposed 100 residential units, the existing and proposed medical facilities, and the surrounding neighborhoods. Therefore, it is anticipated that the projected employment growth associated with the proposed development would fall within the area projections and would not generate substantive or unplanned growth in population or housing.

The proposed project would increase the medical and health facility services at the Martin Luther King Jr. Medical Center campus, providing more professional jobs at the proposed project site. It is anticipated that the proposed medical and health facility development at the proposed project site will contribute to fields that have historically experienced growth, and are projected to continue growing in

[53] This range is a conservative assessment based upon coordination with the County. These numbers are based solely upon estimates regarding what could occur as part of this project and do not reflect known or actual trends although labor forecasts related completed by the United States (US) Bureau of Labor Statistics (BLS) were reviewed. The US BLS, November 2009 Monthly Labor Review, which is available at: http://www.bls.gov/opub/mlr/2009/11/mlr200911.pdf, projected the following for the year 2018: jobs in the health care and service assistance field will account for approximately 12% of the available non-farm jobs; retail and trade would account for 10%; professional business would account for 14% and leisure and hospitality would account for approximately 9% of the available non-farm jobs in the U.S. in 2018.

the future. As illustrated in Table 3.9.2-5 above, in the SCAG region as a whole, the professional business services and education and health services fields are work sectors that have experienced increases in growth, and are projected to experience continued growth. It is anticipated that the SCAG region will add 5.9 million people to reach 24 million people by 2035.[54] Supporting this 2035 projected population will be a total of 10.3 million jobs by 2035 including 2.5 million new jobs.[55] According to SCAG, this level of population and job growth is expected to yield 2 million additional households in the region. According to SCAG, it is estimated that between 2005 and 2035, service-sector jobs will lead in total growth and comprise the largest share of total jobs. Three top leading sectors include 1) education and health services, 2) professional and business services, and 3) construction.[56]

The 2008 RTP predicts that "increases in some service-sector jobs are directly associated with the increase in total population and an increase in the aged population in the region. The growth of service-sector jobs, in particular, population-serving jobs, is likely to continue in the future."[57] The proposed project would foster the Los Angeles subregion's ability to meet existing and continual medical and health needs of the area. The proposed project's impact would not be considered significant because the additional jobs would fall within the subregional forecast and therefore would be consistent with the regional forecast. The additional jobs would also represent a small portion of the forecast. Thus, Tier II the proposed project would not be anticipated to result in a significant increase in resident population due to employment during operations.

Other Growth Issues

Tier I

Indirect growth in population and housing can also occur from major infrastructure improvements that facilitate additional growth beyond the proposed project. Tier I of the proposed project would be limited to the immediate campus boundary. Indirect growth from extension of roads and infrastructure would not be anticipated from Tier I the proposed project, as it would be served by existing infrastructure and would not add any new roadways. Tier I of the proposed project would therefore not induce substantial population growth in an area, either directly or indirectly. Tier I of the proposed project would be expected to have a less than significant impact on population and housing with regard to indirect growth resulting from infrastructure and utilities.

Tier II

Tier II of the proposed project would not result significant impacts with regard to indirect growth resulting from infrastructure and utilities. Indirect growth in population and housing can also occur from major infrastructure improvements that facilitate additional growth beyond the proposed project. Indirect growth from extension of roads and infrastructure would not be anticipated from Tier II of the proposed project, as it would be served by existing infrastructure and would not add any new

[54] Southern California Association of Governments. 2008. *Regional Transportation Plan, Chapter 2,Transportation Planning Challenges*. Available at: http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/f2008RTP_Complete.pdf

[55] Southern California Association of Governments. 2008. *Regional Transportation Plan*, p. 56. Available at: http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/f2008RTP_Complete.pdf

[56] Southern California Association of Governments. 2008. *Regional Transportation Plan, Chapter 2, Transportation Planning Challenges*, p. 58. Available at: http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/f2008RTP_Complete.pdf

[57] Southern California Association of Governments. 2008. *Regional Transportation Plan*. Available at: http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/f2008RTP_Complete.pdf

roadways. Some infrastructure upgrades and connections are proposed and may be required as mitigation for Tier II of the proposed project impacts (e.g., traffic); however these improvements are being sized to accommodate Tier II of the proposed project and would not facilitate substantial additional development outside of the proposed project (please refer to, Section 3.12, Transportation and Traffic and Section 3.16, Utilities and Services). For example, improvements made to the one of the ingress and egress of the hospital entrance would not generate new growth in the surrounding communities. The proposed project does not include any major road improvements or substantial infrastructure modifications that would facilitate additional growth in the general area. Tier II of the proposed project would therefore not induce substantial population growth in an area, either directly or indirectly. Tier II of the proposed project's impact on population and housing would be less than significant with regard to indirect growth resulting from infrastructure and utilities.

Cumulative Impacts

The incremental impacts of the proposed project to population, when added to the related past, present or reasonably foreseeable future projects listed in Section 2.0, *Project Description*, would not be expected to be significant.

Tier I

The proposed project would not result in any population or housing displacement or the need for replacement housing. While temporary jobs would be created by the proposed project, this growth would not be adverse or unplanned when compared to population housing or employment growth projected for the subregion. The housing , school, and other plan development in the County and the surrounding area, such as the South Health Clinic or charter high school when reviewed with the proposed project would all provide services to the existing population and will be developed within the existing infrastructure of the area. As such, Tier I of the proposed project would not contribute any adverse impacts that would contribute to any cumulatively adverse growth issues. Therefore, incremental impacts of the proposed project to population, when added to the related past, present, or reasonably foreseeable, probable future projects listed in Section 2.0, *Project Description*, would not be expected to be significant.

Tier II

While some jobs and housing would be created by the proposed project, this growth would not be adverse or unplanned when compared to population, housing or employment growth projected for the subregion. As such, the proposed project would not contribute any adverse impacts that would contribute to any cumulatively adverse growth issues.

The potential for related projects to have a cumulative impact depends on both geographic location (jurisdiction) as well as the individual components of the project. As noted above, projects considered in this analysis were derived from the traffic study and include those that have recently been completed, are currently under construction, or are in planning. The closest related projects include the South Public Heath Clinic located north of the existing medical campus facility in unincorporated Los Angeles County, a high school located at 11300 Monitor Avenue approximately 0.5 mile from the proposed project in the City of Los Angeles, and the proposed residential development located at 2709 North Wilmington Avenue approximately 0.4 mile from the proposed project in the City of Compton. The high school and the residential development fall under other jurisdiction as do the majority of the related projects. As such, those projects would be subject to their city's respective General Plans as they pertain to population and housing forecasts and requirements. Tier II of the project, which would

take place in a mostly built-out area of the County, would result in a nominal increase in the County's population and housing units. As stated above, direct growth from Tier II of the proposed project's residential component falls within SCAG's projections for the unincorporated Gateway Cities Subregion, and would therefore not result in a significant impact with regard to substantial or unplanned population growth. Tier II of the proposed project would not result in individual significant project impacts; therefore, it would not result in cumulatively considerable impacts. The infrastructure proposed to support the Tier II would not, by itself, be growth inducing because the areas surrounding the project site are already built-out and served by existing infrastructure. The minimal population and housing growth generated by Tier II of the project is supported by adopted plans and policies. This growth falls within the growth anticipated in a regional context by SCAG for the region. Therefore, the incremental impacts of the proposed project to population, when added to the related past, present, or reasonably foreseeable, probable future projects listed in Section 2, Project Description, would not be expected to be significant.

3.9.5 Mitigation Measures

Tier I

The analysis undertaken for this document determined that no significant population and housing impacts would be expected to result from development of Tier I of the proposed project. Therefore, no mitigation measures are required.

Tier II

The analysis undertaken for this document determined that no significant population and housing impacts would be expected to result from development of Tier II of the proposed project. Therefore, no mitigation measures are required.

3.10 PUBLIC SERVICES

As a result of the Initial Study, the County of Los Angeles determined that the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to cause impacts related to public services resulting from the provision of, or need for, new or physically altered governmental facilities.[1] Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts from public services.

The analysis of public services consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the proposed project area, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential for impacts to public services has been analyzed in accordance with the methodologies and information provided by the County of Los Angeles (County) General Plan,[2] the Cities of Los Angeles and Compton Web sites,[3,4] the County of Los Angeles Fire Department Web site,[5] and the County of Los Angeles Sheriff's Department Web site.[6]

3.10.1 Regulatory Framework

State

The Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50)

The Leroy F. Greene School Facilities Act of 1998, Senate Bill 50 (SB 50), signed into law in August 1998, became fully effective with the approval of Proposition 1A on November 3, 1998. SB 50 describes three levels of fees that can be statutorily levied against a project for mitigation of school facilities. SB 50 declares that payment of the specified development fees, where necessary, is full and complete mitigation for impacts to school facilities, and prohibits a public agency from denying a legislative or adjudicative act on the basis of refusal to provide school facilities mitigation that exceeds the amounts authorized by SB 50. SB 50 also forbids requiring the use of the Mello-Roos Communities District Act of 1982 as a condition of approval of any legislative or adjudicative act.[7] SB 50 would apply to the proposed project if impacts from school facilities were identified and mitigation measures were required.

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[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

[2] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[3] City of Los Angeles. 2010. Web site. Available at: http://www.ci.la.ca.us/

[4] City of Compton. 2010. Web site. Available at: http://www.comptoncity.org/index.php/Parks-and-Recreation/recreation-facilities.html

[5] County of Los Angeles Fire Department. 2008. Web site. Available at: http://www.fire.lacounty.gov/default.asp

[6] County of Los Angeles Sheriff's Department. 2008. Web site. Available at: http://www.lasd.org/

[7] CASH Facility Resource Center. 1 May 2003. "Senate Bill 50 and School Facility Fees." Available at: www.cashnet.org

Special Taxes

Special taxes (also known as special assessments) can be used to finance various public services and improvements. The California constitution identifies a "special tax" as any tax that is imposed for a specific purpose. Such taxes must be approved by a two-thirds majority of voters in a service area, which is usually the jurisdictional area of the local government agency that initiates the special tax. The California Government Code provides for the creation of special taxes for lighting districts, garbage pick-up, libraries, hospitals, schools, fire prevention, and police protection services. These taxes are usually levied on a per parcel basis, either as a flat fee or based on parcel square footage.[8]

Mello-Roos Community District Act of 1982

The Mello-Roos Community District Act of 1982 enables certain public agencies to designate a Mello-Roos Community Facilities District, which allows for the financing of public improvements and services. These include basic infrastructure, police protection, fire protection, ambulance services, schools, parks, libraries, museums, and other cultural facilities. Mello-Roos Community Facilities Districts are usually created to finance improvements and services when no other funding sources are available, and require a two-thirds majority vote of residents living within the proposed boundaries. They are used especially often (but not exclusively) in new development areas. Upon approval, a special tax lien is placed against each property in the district, and residents pay a special tax each year. This tax is not based on property value, but on formulas that take into account physical characteristics such as square footage and structure size.[9]

Local

County of Los Angeles General Plan

Public Services and Facilities Element

The Public Services and Facilities element of the County of Los Angeles General Plan describes the objectives, goals, and policies intended to promote the orderly and efficient planning of public services as an important component of successful land use development and growth.[10] Within the Public Services and Facilities element, there are goals presented for fire protection, law enforcement protection, schools, and libraries that are relevant to the evaluation of the proposed project:

Goal 1: Promote phased development, whereby land use proposals are developed in conjunction with approved fire protection facilities or capabilities.

Goal 2: All projects must comply with Los Angeles County Fire Department requirements, including access, water mains, fire flows, and hydrants.

Goal 3: Promote phased development, whereby land use proposals are developed in conjunction with approved law enforcement capabilities.

[8] California Tax Data. 1 May 2003. "What Are Special Taxes?" Available at www.californiataxdata.com.

[9] California Tax Data. 1 May 2003. "What is Mello-Roos?" Available at www.californiataxdata.com.

[10] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

Goal 4: Ensure a desired level of educational facilities through land use and facility planning.

Goal 5: Encourage the shared use of sites for development of schools, parks, libraries, housing, and other compatible uses.

Goal 6: Support phased development and mitigation fees for library facilities and services.

3.10.2 Existing Conditions

3.10.2.1 Fire Protection

The Los Angeles County Fire Department provides fire services to the unincorporated County of Los Angeles. The Los Angeles County Fire Department currently provides its services to the proposed project site.[11] The Los Angeles County Fire Department Station Number 41 is located at 1815 East 120th Street in Los Angeles, which is located less than 0.1 mile north of the proposed project site. Station Number 41 is the closest fire station to the proposed project and, therefore is the first responding fire station. Another fire station that provides additional support to the existing proposed project area is Station Number 147, located at 3161 East Imperial Highway in Lynwood, which is 1.5 miles northeast of the proposed project site. The response time to the proposed project site from a vehicle leaving directly from Fire Station No. 41 is less than 1 minute.[12] Fire Station No. 41 offers a four-person paramedic assessment engine to assess medical needs, as well as a two-person paramedic squad. The response time to the proposed project site from Fire Station No. 146 is approximately 7 minutes. Fire Station No. 146 contains a four-person quint, which provides a pump, water tank, fire hose, aerial device, and ground ladders. The stations, locations, personnel/ equipment, and the distance from each station to the propose project site is described in Table 3.10.2.1-1, *Existing Fire Stations Serving the Proposed Project Site*.

TABLE 3.10.2.1-1
EXISTING FIRE STATIONS SERVING THE PROPOSED PROJECT SITE

Station	Location	Personnel/Equipment	Distance to Site
41	1815 East 120th Street, Los Angeles 90059	4-person assessment engine[a] with limited paramedic capabilities and a 2-Person paramedic squad. A total of six personnel.	Less than 0.1 mile north
147	3161 East Imperial Highway, Lynwood 90262	4-person quint[b] and a 2-person paramedic squad (combination engine/ladder truck apparatus). A total of six personnel.	1.5 mile northeast

SOURCE: County of Los Angeles Fire Department[13]

[11] County of Los Angeles Fire Department. 2009. Web site: see Battalion 13. Available at: http://www.fire.lacounty.gov/HometownFireStations/HometownFireStations.asp

[12] Bagwell, Loretta, Planning Analyst, Planning Division, County of Los Angeles Fire Department, CA. 21 April 2010. Telephone and e-mail correspondence with Leanna Guillermo, Sapphos Environmental, Inc., Pasadena, CA.

[13] Bagwell, Loretta, Planning Analyst, Planning Division, County of Los Angeles Fire Department, CA. 21 April 2010. Telephone and e-mail correspondence with Leanna Guillermo, Sapphos Environmental, Inc., Pasadena, CA.

3.10.2.2 Police Protection

Police protection in the proposed project area is provided by the Los Angeles County Sheriff's Department. In the proposed project area, the Los Angeles County Sheriff's Department's Century Station is responsible for providing law enforcement services. The Century Station is located 0.8 mile northeast of the proposed project site at 11703 Alameda Street, Lynwood, California 90262. The Century Station is responsible for providing law enforcement services to more than 200,000 individuals residing within 13 square miles of southern Los Angles County, including the Willowbrook area where the proposed project is located.[14]

According to the Century Station's crime and arrest statistics for 2007 to 2009, there were 21,269 total reported incidents in 2007, 28,912 total reported incidents in 2008, and 23,869 total reported incidents in 2009 (Table 3.10.2.2-1, *Crime and Arrest Reported Incident Statistics in the Proposed Project Area*). Part I Crimes, which include criminal homicide, forcible rape, robbery, aggravated assault, burglary, larceny theft, grand theft auto, and arson, did not increase significantly between 2007 and 2008, and decreased in 2009 in the Century Station's law enforcement area with 7,430 incidents reported in 2007, 7,366 incidents reported in 2008, and 5,816 incidents reported in 2009 (Table 3.10.2.2-1). Part II Crimes are crimes that are not considered Part I Crimes, including, but not limited to, simple assaults, disorderly conduct, vandalism, driving under the influence, and embezzlement. In the Century Station's service area, there was an increase in Part II Crimes from 2007 to 2008, from 7,512 incidents reported to 13,641 (Table 3.10.2.2-1). However, from 2008 to 2009, the Part II Crime incidents reported decreased to 10,569. Non-criminal incidents, such as traffic-related incidents, increased from 6,417 incidents to 7,905 from 2007 to 2008 (Table 3.10.2.2-1). Part II Crimes or non-criminal incidents did not increase from 2008 to 2009, with 7,484 non-criminal incidents in 2009. The total number of arrests in 2007 in the Century Station's service area was 9,352 while the total number in 2008 was 12,714, and 13,477 in 2009 (Table 3.10.2.2-1).[15,16]

TABLE 3.10.2.2-1
CRIME AND ARREST REPORTED INCIDENT STATISTICS IN THE PROPOSED PROJECT AREA

Crimes	2007	2008	2009
Part I Crimes	7,340	7,366	5,816
Part II Crimes	7,512	13,641	10,569
Non Incidental Crimes	6,417	7,905	7,484
Reported Incidents	21,269	28,912	23,869
Total Arrests	9,352	12,714	13,477

SOURCE: Los Angeles County Sheriff's Department[17]

[14] County of Los Angeles County Sheriff's Department, Century Station. 2007. Web site. Available at: http://www.lasd.org/stations/for2/century/index.html

[15] County of Los Angeles Sheriff's Department. Crime and Arrest Statistics Summary 2007 to 2008. Century Station. Available at: http://www.lasdhq.org/sites/yir9600/yir2008/218.pdf

[16] County of Los Angeles Sheriff's Department. Crime and Arrest Statistics Summary 2009. Century Station. Available at: http://app1.lasd.org/caas_web/era01/index.cfm?mod=mnu&cur_year=2009&locat=sta_CEN

[17] County of Los Angeles Sheriff's Department. Crime and Arrest Statistics Summary 2007 to 2008. Century Station. Available at: http://www.lasdhq.org/sites/yir9600/yir2008/218.pdf

[17] County of Los Angeles Sheriff's Department. Crime and Arrest Statistics Summary 2009, Century Station. Available at: http://app1.lasd.org/caas_web/era01/index.cfm?mod=mnu&cur_year=2009&locat=sta_CEN

3.10.2.3 Schools

Within the proposed project area, school-age children attend schools in the Los Angeles Unified School District and the Compton Unified School District.[18,19] There are 11 schools and education facilities located within a 0.5-mile radius of the proposed project site: King Drew Magnet High School, Lincoln Drew Elementary School and Headstart, Carver Elementary, Harriet Tubman High School, Cesar Chavez Alternative School, Compton Community Day Middle School, New Designs Charter School, Los Angeles Computer Science Academy, Ronald E. McNair Elementary, Martin Luther King Elementary, and Willowbrook Middle School.

The Los Angeles Unified School District is expected to complete a multiphase program that would provide classroom seats to address the current need for classroom seats within its service area, which includes the proposed project site.[20] King Drew Magnet High School is located adjacent to the MLK campus at 1601 East 120th Street, Los Angeles. King Drew Magnet High School buildings are located on a 3.8-acre property. Currently, 240 students attend the medical magnet high school.[21] There are no current plans for expansion of the King Drew Magnet High School campus. A Head Start program operates on the Lincoln Drew Elementary School site which is located at 1667 East 118th Street, Los Angeles, 0.10 mile to the north of the proposed project site. 332 pupils were enrolled in Lincoln Drew Elementary School during the 2008–2009 school year.[22] Los Angeles Computer Science Academy is located at 2208 East 11th Street, Los Angeles, located 0.36 mile northeast of the proposed project site. According to the 2007 state data, 35 students are enrolled at the Los Angeles Computer Science Academy.[23] Martin Luther King Elementary is located at 2270 East 122nd Street, Compton , located 0.43 mile east of the proposed project site. 556 pupils attend Martin Luther King Elementary School. Harriet Tubman High School is located at 12501 South Wilmington Avenue, Compton, and located 0.25 mile south of the proposed project site. In 2007, six students were enrolled at Harriet Tubman High School. Cesar Chavez Alternative School is located at 12501 South Wilmington Avenue, Compton, and located 0.25 mile south of the proposed project site. As of 2007, the enrollment at Cesar Chavez Alternative School was 359 pupils. Ronald E. McNair Elementary is located at 1450 West El Segundo Boulevard, Compton, located 0.41 mile south of the proposed project site. 519 students attend Ronald E. McNair Elementary. Willowbrook Middle School is located at 2601 North Wilmington Avenue, Compton, located 0.47 mile south of the proposed project site. The enrollment at Willowbrook Middle School is 605 students. Carver Elementary is located at 1425 East 120th Street, Los Angeles, located 0.21 mile west of the proposed project site. 365 pupils attended Carver Elementary according to the 2007 state data.[24] New Designs Charter School is located at 12714 Avalon

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[18] Los Angeles Unified School District. 2009. Local District 7. Available at: http://notebook.lausd.net/portal/page?_pageid=33,135565&_dad=ptl&_schema=PTL_EP

[19] Compton Unified School District. 2009. School/Transportation Information. Available at: http://transport.compton.k12.ca.us/elinkrp/Students/BasicTransBoundarySearch.aspx

[20] Los Angeles Unified School District. January 2009. *Strategic Execution Plan*. Available at: http://www.laschools.org/sepdocs/sep/pdf/sep-2009-web.pdf

[21] Los Angeles Unified School District. King Drew Magnet High School of Medicine and Science. Available at: http://www.lausd.k12.ca.us/King_Drew_Medical_Magnet/index.html

[22] Support Personnel Accountability Report Card. Lincoln Drew Elementary School. Available at: http://www.sparconline.net/sparcs/2009sparcs/es-lincolndrew.pdf

[23] *Los Angeles Times*. Local. Education. *California Schools Guide*. Los Angeles, CA. Available at: http://projects.latimes.com/schools/

[24] *Los Angeles Times*. Local. Education. *California Schools Guide*. Los Angeles, CA. Available at: http://projects.latimes.com/schools/

Boulevard, Los Angeles, and located 0.28 mile northwest of the proposed project site. There are 150 students who attend New Designs Charter School.[25]

3.10.2.4 Parks

According to the General Plan, the County's threshold for recreation and open space is four acres per 1,000 residents for subdivisions.[26] Currently six parks are located within a 1-mile radius of the proposed project site: 109th Street Recreational Center Park (0.83 miles north of the proposed project), Sibrie Park (0.42 mile south of the proposed project), Enterprise Park (0.77 mile southwest of the proposed project), Mona Park (0.51 mile west of the proposed project), Earvin Magic Johnson Park (0.59 mile west of the proposed project), and George W. Carver Park (0.25 mile northwest of the proposed project).

The 109th Street Recreational Center Park is a City of Los Angeles park containing an auditorium, lighted baseball diamond, lighted indoor and outdoor basketball courts, children's play area, lighted football field, indoor and outdoor gym, outdoor seasonal pool, lighted soccer field, and lighted tennis courts.[27]

Sibrie Park is a 3.8-acre community park of the City of Compton which offers a children's playground apparatus, tetherball, volleyball, barbecue pits, picnic area, junior baseball diamond, and lighted outdoor basketball courts.[28]

The 10-acre Enterprise Park offers lighted baseball/softball fields, children's play area, community recreation room, gymnasium, multi-purpose field, picnic areas with barbeque grill, and a swimming pool.[29]

The 8.4-acre Mona features a children's play area, gymnasium, lighted baseball/softball diamond, outdoor basketball court, shaded picnic shelter, and a swimming pool.[30]

The 94-acre Earvin Magic Johnson Park contains children's play areas, picnic areas with barbeque grills, restrooms, soccer fields, two fishing lakes, and a walking path.[31]

The 7.22-acre George W. Carver Park contains lighted baseball/softball fields, a multipurpose field, a multipurpose room, picnic areas with barbeque grills, and a swimming pool.[32]

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[25] Trulia. New Designs Charter School. *School Overview*. Accessed 5 May 2010. Available at: http://www.trulia.com/schools/CA-Los_Angeles/New_Designs_Charter_School/

[26] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan, Conservation, Open Space and Recreation Element*, p. II-3. Available at: http://planning.lacounty.gov/assets/upl/project/gp_web80-conservation-and-open-space.pdf

[27] City of Los Angeles. Department of Recreation and Parks. Accessed 6 January 2010. Web site. Available at: http://www.laparks.org

[28] City of Compton. Parks and Recreation. Recreation Facilities. Accessed 6 January 2010. Web site. Available at: http://www.comptoncity.org/index.php/Parks-and-Recreation/recreation-facilities.html

[29] County of Los Angeles Parks and Recreation. Accessed 6 January 2010. Web site. Available at: http://parks.lacounty.info

[30] County of Los Angeles Parks and Recreation. Accessed 6 January 2010. Web site. Available at: http://parks.lacounty.info

[31] County of Los Angeles Parks and Recreation. Accessed 6 January 2010. Web site. Available at: http://parks.lacounty.info

[32] County of Los Angeles Department of Parks and Recreation. Accessed 6 January 2010. Web site. Available at:

3.10.2.5 Other Public Services

In the proposed project area, existing public facilities include the Willowbrook Library at 11838 South Wilmington Avenue, Los Angeles. The Willowbrook Library is a 2,200-square-foot building, which is located less than 0.1 mile north of the proposed project site.[33] A U.S. Post Office is located at 2241 East El Segundo Boulevard, approximately 0.6 mile southeast of the proposed project site.[34]

3.10.3 Significance Thresholds

The potential for the proposed project to result in impacts related to public services was analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines. The project would normally be considered to have a significant impact to public services when the potential for any one of the following five thresholds occurs:

- Cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:
  - Fire protection
  - Police protection
  - Schools
  - Parks
  - Other public services

Significant environmental impacts would result when the site of the new or physically altered facility is unknown, or where the site is known but has not been analyzed pursuant to CEQA.

3.10.4 Impact Analysis

3.10.4.1 Fire Protection

Tier I

Tier I of the proposed project would not be expected to have significant direct or indirect impacts to the environment resulting from the provision of, or need for, new or physically altered governmental fire protection facilities. Implementation of Tier I of the proposed project would not be expected to induce population growth or shifts from the neighboring communities to areas surrounding the proposed project site. The new facilities and campus improvements associated with Tier I of the proposed project would substitute and enhance existing facilities on the campus. Tier I is being designed to respond to the existing community need and population. Therefore, the current fire protection services provided to the campus would adequately support Tier I of the proposed project. Tier I of the proposed project does not entail elements that would result in the need for additional fire protection.

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http://parks.lacounty.info

[33] County of Los Angeles Public Library. Accessed 8 October 2009. Web site. Available at: http://www.colapublib.org

[34] United States Postal Service. Accessed 8 October 2009. Web site. "Locator." Available at: http://usps.whitepages.com/post_office

Tier II

Tier II of the proposed project would not be expected to have significant direct or indirect impacts to the environment resulting from the provision of, or need for, new or physically altered governmental fire protection facilities. Tier II is being designed to respond to the existing and projected community needs and population. Implementation of the campus-wide Master Plan, is anticipated to include development of up to 100 residential units and up to 1,814,696 square feet of mixed-use development. The development of up to 100 residential units on the proposed project site would be expected to induce population shifts from the neighboring communities to the proposed project site. The proposed project development, including the new mixed uses in Tier II, would be expected to provide employment opportunities, as described in Section 3.9, *Population and Housing*. The jobs would be expected to be filled with the workforce in the surrounding communities and possibly in other areas within a commuting distance of the project site; therefore, no direct or indirect population growth would be anticipated. Additionally, no growth-inducing extensions of infrastructure, including roadways, are proposed as a part of the proposed project.

As discussed in Section 3.9, *Population and Housing,* the anticipated shift in the proposed project site's estimated population is consistent with the SCAG forecast for the Gateway Cities Subregion. Additionally, the proposed development would not be expected to significantly surpass the entitled or former operational capacity of the existing Martin Luther King, Jr. Medical Center Campus (existing campus). Furthermore, the residential portion of the proposed project would be for hospital employees and would not significantly increase the population within the area of the proposed project. As such, development of the proposed project would not require the provision of new, or the physical alteration of, existing governmental fire protection facilities beyond regional planning expectations. It is anticipated that the campus employment will be provided by residents within the communities surrounding the proposed project site to the extent possible; while there may be an anticipated shift in the populations, the existing and projected fire protection services would be expected to support this population shift. The population shifts are also consistent with the Compass Blueprint 2% Strategy, as discussed in Section 3.9, *Population and Housing*. This guideline encourages modest changes that are consistent with the SCAG Southern California Compass Growth Vision Report (Compass Growth Vision). The 2% Strategy Opportunity Areas are primarily comprised of metro centers, city centers, rail transit stops, bus rapid transit corridors, airports, ports and industrial centers, priority residential in-fill areas, and Compass Blueprint priority communities.[35] The Martin Luther King, Jr. Medical Center is within the 2% Strategy Opportunities Area (City of Los Angeles South Map). Hence, the population from the proposed project would be consistent with the Compass Growth Vision and the need for additional or altered fire protection facilities would not be required. Therefore, because the proposed project would not cause the provision of, or need for, new or physically altered governmental fire protection facilities necessary for maintaining acceptable response times, there would be no significant impacts related to fire protection facilities. It is understood however, that the County of Los Angeles Fire Department will review the specific fire department requirements during the planning phase of the proposed project in order to determine whether Tier II of the proposed project adequately meets the requirements of the County of Los Angeles Fire Department.[36]

[35] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, Opportunities Areas Maps." Available at: http://www.compassblueprint.org/opportunityareas

[36] County of Los Angeles Fire Department. Todd, John R., Chief, Forestry Division Prevention Services Bureau. 20 July 2010. Letter Correspondence to the Chief Executive Office (Sabra White). Los Angeles, CA.

3.10.4.2 Police Protection

Tier I

Tier I of the proposed project would not be expected to induce population growth or shifts from the neighboring communities to communities surrounding the proposed project site. The new facilities and campus improvements associated with Tier I of the proposed project would substitute and enhance existing facilities on the campus. The Century Station is located 0.8 mile northeast of the proposed project site at 11703 Alameda Street, Lynwood, California 90262. The Century Station is responsible for providing law enforcement services to more than 200,000 individuals residing within 13 square miles of southern Los Angles County, including the Willowbrook area where the proposed project is located.[37] Tier I is being designed to respond to the existing community need and population. Therefore, the current police services provided to the campus would adequately support Tier I of the proposed project. Therefore, because the proposed project would not cause the provision of, or need for, new or physically altered governmental police protection facilities necessary for maintaining acceptable response times, there would be no significant impacts related to police protection facilities.

Tier II

Tier II of the proposed project would not be expected to have significant direct or indirect impacts to the environment resulting from the provision of, or need for, new or physically altered governmental police protection facilities. Tier II is being designed to respond to the existing and anticipated community needs and population. The proposed project would entail additional development on the existing campus and may include the construction of up to 100 residential units. The current levels of services provided to the proposed project site are based upon the current structure and configuration of the proposed project.[38] It is anticipated that these service allocations would shift and grow in response to the expected population growth in the area. Additionally, as discussed above and in Section 3.9, *Population and Housing*, the development on the proposed project site would not be expected to significantly surpass the entitled or former operational capacity of the existing campus. The estimated population changes from the proposed project would be consistent with population projections in the SCAG forecast for the Gateway Cities Subregion. Furthermore, the residential portion of the proposed project would be for hospital employees and would not significantly increase the population within the area of the proposed project. As such, development of the proposed project would not require the provision of new, or the physical alteration of, existing governmental police protection facilities. The proposed project's population would be consistent with the Compass Growth Vision and the need for additional or altered police protection facilities would not be required. It is anticipated that the campus employment will be provided by residents within the communities surrounding the proposed project site to the extent possible; while there may be an anticipated shift in the population, the existing and projected police protection services would be expected to support this population shift. Therefore, because the proposed project would not cause the provision of, or need for, new or physically altered governmental police protection facilities necessary for maintaining acceptable response times, there would be no significant impacts related to police protection facilities. It is understood, however, that the Los Angeles County Sheriff's Department will review the specific police department requirements

[37] County of Los Angeles Sheriff's Department, Century Station. 2007. Web site. Available at: http://www.lasd.org/stations/for2/century/index.html

[38] County of Los Angeles Sheriff's Department (Tse, Gary T.K., Director, Facilities Planning Bureau)..24 May 2010. Letter Correspondence to Sapphos Environmental, Inc. (Eimon Raoof). Pasadena, CA.

during the planning phase of the proposed project in order to determine whether Tier II development of the proposed project adequately meets the service parameters and projections of the Los Angeles County Sheriff's Department.[39]

3.10.4.3 Schools

Tier I

Tier I of the proposed project would not be expected to induce population growth or shifts in school aged children from the neighboring communities to the proposed project site. The new facilities and campus improvements associated with Tier I of the proposed project would substitute and enhance existing facilities on the campus. The current school services provided to the residents surrounding the campus would adequately support Tier I of the proposed project. Therefore, because the proposed project would not cause the provision of, or need for, new or physically altered school facilities to maintain acceptable service rations, there would be no significant impacts related to school facilities.

Tier II

Tier II of the proposed project would not be expected to have significant direct or indirect impacts to the environment resulting from the provision of, or need for, new or physically altered governmental school facilities. Although the proposed project is designed to create new employment opportunities and contains a residential component, which would shift the population in the proposed project area, it is anticipated that the existing schools would support the needs of the proposed project. Due to the Los Angeles Unified School District's multiphase program that would provide classroom seats to address the current need for classroom seats within its service area, which includes the proposed project site, the proposed project would not have a significant impact to school facilities. Additionally, as determined by the State of California, mandated payment of school fees for new development in compliance with SB 50, is considered full mitigation under CEQA. School fees are collected prior to project development.[40] As the proposed project's population would be consistent with the SCAG forecast for the Gateway Cities Subregion and the Compass Growth Vision, additional or new park school facilities would not be required. Therefore, because the proposed project would not cause the provision of, or need for, new or physically altered school facilities to maintain acceptable service rations, there would be no significant impacts related to school facilities. It is understood, however, that the Los Angeles Unified School District and the Compton Unified School District will be consulted during the planning phase of the proposed project in order to ensure that Tier II would not significantly impact school facilities.

3.10.4.4 Parks

Tier I

Tier I of the proposed project would not be expected to induce population growth or shifts in from the neighboring communities to the proposed project site. The new facilities and campus improvements associated with Tier I of the proposed project would substitute and enhance existing facilities on the campus. The current park facilities and services provided to the residents surrounding the campus

[39] County of Los Angeles Sheriff's Department (Tse, Gary T.K., Director, Facilities Planning Bureau). 24 May 2010. Letter Correspondence to Sapphos Environmental, Inc. (Eimon Raoof). Pasadena, CA.

[40] California Department of Education. Accessed on 12 November 2009. Chaptered Senate Bills. Available at: http://www.cde.ca.gov/re/lr/ga/chapsen07.asp

would adequately support Tier I of the proposed project. Therefore, because the proposed project would not cause the provision of, or need for, new or physically altered governmental park facilities to maintain acceptable service rations, there would be no significant impacts related to park facilities.

Tier II

Tier II of the proposed project would not be expected to have significant direct or indirect impacts to the environment resulting from the provision of, or need for, new or physically altered governmental park facilities. While the proposed project includes substantial development and may shift the population slightly within the proposed project area, the proposed project and the surrounding community would be adequately serviced by the park facilities listed above. As the proposed project's population would be consistent with the SCAG forecast for the Gateway Cities Subregion and the Compass Growth Vision, additional or new park facilities would not be required. Additionally, the County of Los Angeles, along with various neighboring jurisdictions, has planned to improve many existing recreational facilities, as described in Section 3.11, *Recreation*.[41] Therefore, because the proposed project would not cause the provision of, or need for, new or physically altered governmental park facilities to maintain acceptable service rations, there would be no significant impacts related to park facilities. It is understood, however, that the County of Los Angeles will review the requirements during the planning phase of the proposed project to ensure that Tier II of the proposed project would not significantly impact park facilities.

3.10.4.5 Other Public Services

Tier I

Tier I of the proposed project would not be expected to induce population growth or shifts in from the neighboring communities to the proposed project site. The new facilities and campus improvements associated with Tier I of the proposed project would substitute and enhance existing facilities on the campus. The current other public services or governmental facilities provided to the residents surrounding the campus would adequately support Tier I of the proposed project. Therefore, because the proposed project would not cause the provision of, or need for, other new or physically altered governmental facilities to maintain acceptable service rations or response times, there would be no significant impacts related to other public services or governmental facilities.

Tier II

Tier II of the proposed project would not be expected to have significant direct or indirect impacts to the environment resulting from the provision of, or need for, other new or physically altered governmental facilities. The proposed project would not require the alteration or construction of new government facilities. The proposed project and the surrounding community would be adequately serviced by the existing public facilities. As the proposed project's population would be consistent with the SCAG forecast for the Gateway Cities Subregion and the Compass Growth Vision, additional or new governmental facilities would not be required. Therefore, because the proposed project would not cause the provision of, or need for, other new or physically altered governmental facilities to maintain acceptable service rations or response times, there would be no significant impacts related to other public services or governmental facilities. It is understood, however, that the County of Los Angeles will review the requirements during the planning phase of the proposed project to ensure that

[41] County of Los Angeles Department of Parks and Recreation. Accessed on 14 June 2010. "Regional Open Space District, Find Open Space District Project in Your Area." Available at: http://gis.lacounty.gov/rposd/

Tier II of the proposed project would not significantly impact other public services or governmental facilities.

3.10.4.6 Cumulative Impacts

Tier I

The incremental impacts of the proposed project from public services, when added to the related past, present, or reasonably foreseeable, probable future projects listed in Section 2.0, *Project Description*, would not be expected to be significant. Tier I of the proposed project would not be expected to induce population growth in the proposed project area. Tier I of the proposed project is being designed to accommodate the existing community. These hospital services would not be expected to create an additional need but rather respond to the existing community. Therefore, when Tier I is paired with any of the related projects, the impact would not be significant. Therefore, Tier I would not cause the need for addition fire protection, police protection, school facilities, park facilities, or other public services.

Tier II

Tier II of the proposed project is may include development of up to 100 residential units and up to 1,814,696 square feet of mixed-use development. The development of up to 100 residential units on the proposed project site would be expected to induce population shifts from the neighboring communities to the proposed project site. The proposed project development would be expected to provide employment opportunities, as described in Section 3.9, *Population and Housing*. The jobs would be expected to be filled with the workforce in the surrounding communities and possibly in other areas within a commuting distance of the project site. Tier II of the proposed project is being designed to accommodate the existing community and its forecasted population. The proposed commercial/retail uses are intended to serve the proposed 100 residential units, the existing and proposed medical facilities, and the surrounding neighborhoods. Employees are less likely to relocate for jobs in the retail industry. Given the small number and type of jobs, substantial population impacts are not anticipated due to operation of the commercial/ retail component of Tier II. Additionally the growth of service-sector jobs, in particular, population-serving jobs, is likely to continue in the future."[42] The medical and health facility services created in Tier II of the proposed project fall under service-sector jobs. The proposed project would foster the Los Angeles subregion's ability to meet existing and continual medical and health needs of the area. The proposed project's impact would not be considered significant because the additional jobs would fall within the subregional forecast and therefore would be consistent with the regional forecast. Therefore, no direct or indirect population growth would be anticipated. Additionally, no growth-inducing extensions of infrastructure, including roadways, are proposed as a part of the proposed project.

The proposed project would not create substantial population growth that would increase or exacerbate public services conditions when added to the related past, present, or reasonably foreseeable, probable future projects listed in Section 2.0, *Project Description*. The anticipated population shifts would come from individuals currently residing within and near the proposed project area. Additionally, Tier II of the proposed project is being designed to respond to the existing community and its forecasted population growth. The medical and health facility services created in Tier II would not create the need for more public services but accommodate the existing population

[42] Southern California Association of Governments. 2008. *Regional Transportation Plan*. Available at: http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/f2008RTP_Complete.pdf

and its growth. Therefore, when Tier II of the proposed project is paired with the related projects within an approximate 3-mile radius, Tier II would not cause a cumulative impact to public services. As such, the proposed project would not considerably contribute to the need for new or physically altered governmental facilities.

3.10.5 Mitigation Measures

Tier I

The analysis undertaken for this document determined that no significant public services impacts would be expected from Tier I of the proposed project. Therefore, no mitigation measures are required.

Tier II

The analysis undertaken for this document determined that no significant public services impacts would be expected from Tier II of the proposed project. Therefore, no mitigation measures are required.

3.11 RECREATION

As a result of the Initial Study, the County of Los Angeles (County) determined that the Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in impacts to recreation.[1] Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potentially significant impacts to recreation.

The analysis of recreation consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the proposed project area, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. Recreation at the proposed project site was evaluated with regard to state, regional, and local data and forecasts for recreation, and the County of Los Angeles General Plan (General Plan).[2]

3.11.1 Regulatory Framework

This regulatory framework identifies the federal, state, and local statutes and policies that relate to recreation and must be considered by the County during the decision-making process for the proposed project.

Federal

Section 4(f) of the Department of Transportation Act

Section 4(f) of the Department of Transportation Act [Section 4(f), re-codified at 49 USC 303], analyzes whether a proposed project has the potential to result in a "use" of public parks and recreation lands, wildlife and waterfowl refuges, and any historic sites as defined by the U.S. Department of Transportation. Use, within the context of Section 4(f), occurs when a proposed project requires a physical taking or other direct control of the land for the purpose of the proposed project. Use also includes adverse environmental impacts, also termed "constructive use". Constructive use may occur when impacts substantially impair the activities, features, or attributes of the resource that contribute to its significance or its enjoyment. As outlined for the proposed project, no such "use" would be considered applicable for project completion.

State

Quimby Act

State Subdivision Map, Section 66477 (The Quimby Act), allows the legislative body of a city or county, by ordinance, to require the dedication of land, the payment of fees in lieu of the dedication of land, or a combination of both, for park and recreational purposes as a condition of approval of a final tract map or parcel map. The Quimby Act requires that developers set aside land, donate conservation easements, or pay fees for park improvements. The goal of the Quimby Act is to require developers to help mitigate the impacts of property improvements. The Board of Supervisors has amended the

[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

[2] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

County Subdivision Ordinance to require park fees if all or any portion of the local park space obligation for a residential subdivision is not satisfied by the existing local park space. Park fees are assessed as a condition of final approval of the subdivision.[3] This open space requirement applies only to residential subdivisions and only in the case where there are not enough parks and open space in surrounding areas.[4]

Regional

The Southern California Association of Government's (SCAG's) *Regional Comprehensive Plan and Guide* states that urban-type land uses and facilities need to support future additional population growth that will consume a large portion of the remaining privately held land in the region.[5] The plan emphasizes three primary goals related to the consideration of the proposed project:

- Provide adequate opportunities to meet the needs for outdoor recreation, which is considered important to providing a good quality of life for residents who live in highly urbanized areas of the region
- Maintain open space for adequate protection of lives and property against natural and manmade disasters
- Develop well-managed and viable ecosystems or known habitats of rare, threatened, and endangered species

Local

Los Angeles County Proposition A Grants

Formally known as the Los Angeles Safe Neighborhood Parks Act, Proposition A provided for the formation of the Los Angeles County Regional Park and Open Space District, and was created to improve the quality of life in the County through the preservation of beaches; renovations and improvements to new and existing recreational facilities; and restoration of rivers, streams, and trails.

County of Los Angeles General Plan, Conservation, Open Space, and Recreation Element and Land Use Element

The Conservation, Open Space, and Recreation element of the General Plan includes general goals and principles that guide decision making related to recreational resources. In addition, this element of the General Plan sets forth the County's standard of 4 acres of parkland / open space per 1,000 residents for subdivisions.[6] The goals of the Conservation, Open Space, and Recreation element are to protect areas of significant natural resources, to conserve natural amenities, to protect against natural

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[3] *Los Angeles County Subdivision Ordinance*, Section 21.28.140.

[4] County of Los Angeles Department of Regional Planning. Adopted 23 October 2001. *County of Los Angeles General Plan, Housing Element 1998-2005*. Los Angeles, CA.

[5] Southern California Association of Governments. Adopted April 1995. *Regional Comprehensive Plan and Guide, Chapter 9*, "Open Space and Conservation." Available at: http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGOpenSpaceChapter.pdf

[6] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan, Conservation, Open Space and Recreation Element*, p. II-3. Available at:http://planning.lacounty.gov/assets/upl/project/gp_web80-conservation-and-open-space.pdf

hazards, and to meet the public's desire for open-space experiences. Specific principles related to the proposed project include the following:[7]

- Promote the acquisition or preservation of areas identified in the Regional Recreation Areas Plan
- Provide diverse recreational opportunities
- Refine and reestablish standards in accordance with the current understanding of the needs and use of regional recreation areas and facilities
- Provide a wider range of recreational areas and facilities identified as having regional significance.

3.11.2 Existing Conditions

County Parks

The proposed project is located within an unincorporated area of the County. The County Department of Parks and Recreation headquarters is located at 433 South Vermont Avenue in Los Angeles. Within the County, there are approximately 65,528 recreational areas composed of lakes and lagoons, 10 regional parks, 17 community parks, 67 local parks, and 19 golf courses, among other recreational areas and facilities.[8]

Local

The proposed project site is located within a 1-mile radius of six parks: 109th Street Recreational Center Park, Sibrie Park, Enterprise Park, Mona Park, Earvin Magic Johnson Park, and George W. Carver Park.

The 109th Street Recreational Center Park is located at 1464 East 109th Street in the City of Los Angeles, and is located approximately 0.83 mile north of the proposed project site. The 109th Street Recreational Center Park is a City of Los Angeles park containing an auditorium, lighted baseball diamond, lighted indoor and outdoor basketball courts, children's play area, lighted football field, indoor and outdoor gym, outdoor seasonal pool, lighted soccer field, and lighted tennis courts.[9]

Sibrie Park is located at 1300 West El Segundo Boulevard in the City of Compton, and is approximately 0.42 mile south of the proposed project site. Sibrie Park is a 3.8-acre community park managed by the City of Compton that offers a children's playground, tetherball, volleyball courts, barbecue pits, picnic area, junior baseball diamond, and lighted outdoor basketball courts.[10]

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[7] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[8] County of Los Angeles, Department of Parks and Recreation. *Annual Report 2005–2006*. Available at: http://parks.lacounty.gov/cms1_069242.pdf?Title=2005-2006%20Annual%20Report

[9] City of Los Angeles, Department of Recreation and Parks. "109th Street Recreation Center." Web site. Available at: http://www.laparks.org/dos/reccenter/facility/109thStreetRC.htm

[10] City of Compton, Parks and Recreation Department. "Recreation Facilities: Sibre Park." Web site. Available at: http://www.comptoncity.org/index.php/Parks-and-Recreation/recreation-facilities.htm

Enterprise Park is a 10-acre County park located at 13055 Clovis Avenue in the City of Los Angeles. This park is located approximately 0.77 mile southwest of the proposed project site. The park offers lighted baseball/softball fields, a children's play area, community recreation room, gymnasium, multi-purpose field, picnic areas with barbeque grills, and a swimming pool.[11]

Mona Park is an 8.4-acre County park located at 2291 East 121st Street in the City of Compton. This park is located approximately 0.51 mile west of the proposed project site. The park features a children's play area, gymnasium, lighted baseball/softball diamond, outdoor basketball court, shaded picnic shelter, and a swimming pool.[12]

Earvin Magic Johnson Park is a 94-acre County park located at 905 East El Segundo Boulevard in the City of Los Angeles. This park is located approximately 0.59 mile west of the proposed project site. The park contains children's play areas, picnic areas with barbeque grills, restrooms, soccer fields, two fishing lakes, and a walking path.[13]

George W. Carver Park is a 7.22-acre County park located at 1400 East 118th Street in the City of Los Angeles, California. This park is located 0.25 mile northwest of the proposed project site. The park contains lighted baseball/softball fields, a multi-purpose field, multi-purpose room, picnic areas with barbeque grills, and a swimming pool.[14]

Future Parks and Recreational Improvements

The County, along with various neighboring jurisdictions, has planned to improve many existing recreational facilities. Within a 5-mile radius of the Martin Luther King, Jr. Medical Center Campus, there are numerous park renovations occurring and several park expansion projects proposed. Table 3.11.2-1, *Future Park Expansion and Improvements Project*, presents highlights (but not an exhaustive list) of the proposed improvements.

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[11] County of Los Angeles, Department of Parks and Recreation. "Enterprise Park." Available at: http://parks.lacounty.info/Parkinfo.asp?URL=cms1_033398.asp&Title=Enterprise

[12] County of Los Angeles, Department of Parks and Recreation. "Mona Park." Available at: http://parks.lacounty.info/Parkinfo.asp?URL=cms1_033411.asp&Title=Mona

[13] County of Los Angeles, Department of Parks and Recreation. "Earvin 'MAGIC' Johnson Recreation Area." Available at: http://www.lacountyparks.org/Parkinfo.asp?URL=cms1_033409.asp&Title=Earvin%20%22MAGIC%22%20Johnson%20Recreation%20Area

[14] County of Los Angeles, Department of Parks and Recreation. "George Washington Carver Park." Available at: http://www.lacountyparks.org/Parkinfo.asp?URL=cms1_033393.asp&Title=George%20Washington%20Carver%20Park

TABLE 3.11.2-1
FUTURE PARK EXPANSION AND IMPROVEMENTS PROJECTS[15]

Park/ Facility name	Location	Description of Improvement
Paramount Park Expansion	14400 Paramount Boulevard, Paramount	$2.3 million comprehensive park improvement project that involves the conversion of 4.5 acres of utility right-of-way into park space; project includes landscaped park improvements; refurbishment of existing sport facilities; construction of new sport and playground facilities; installation of new drainage and irrigation systems, a new parking lot, and a wrought iron fence[16]
Various Carson Parks Improvements (Anderson Park)	19101 Wilmington Avenue, Carson	Improvements to various parks to rehabilitate and/or restore facilities or bring them into compliance with the Americans with Disabilities Act (ADA)
Playing Field Refurbishment at Carson and Hemingway Park	700 E Gardena Boulevard, Carson	Refurbish one playing field at Carson Park and two adjacent playing fields at Hemingway Park (in planning)
South Central Sports Activates Center	7020 Figueroa Street, Los Angeles	Acquisition and development of a regional sports activity center
Watts Willowbrook Boys and Girls Club Renovation and Expansion	1339 East 120th Street, Los Angeles	Rehabilitation and construction of the existing Boys and Girls Club; improvements to the facility including: remodeling of gymnasium to a multi-purpose room, installation of security features and lighting, and reorientation of entrance and parking, construction of a new gymnasium and weight room
Housing Authority—Nickerson Gardens	11251 Compton Avenue, Watts / Los Angeles	Site redevelopment including irrigation, turfing, landscaping, lighting, court and field improvements, ADA improvements, and recreation center/community center building refurbishments
Imperial Courts Recreation Center	2250 East 114th Street, Los Angeles	Demolition and removal of the existing community building and construction of a replacement building of the same size at the current location
Mona Park—General Rehabilitation	2291 East 121st Street, Compton	Mona Park: Improvements to restrooms, picnic areas, irrigation system, parking lot, hard court, ball field, roofs, and related facilities; Carver Park: improvements to the community center, irrigation system, hard court, ball field, picnic areas and related facilities
Mona and Carver Parks—General Rehabilitation—Carver Park Carver Park—Various Parks Surfacing Projects Carver Park: Various 2nd District Parks: Intrusion	1400 East 118th Street, Los Angeles	Refurbish hard courts, parking lots and restore landscape and irrigation where needed at Alondra, Carver, Earvin "Magic" Johnson, Keller, Ladera, Mona, Watkins, Victoria, Athens and Bethune Parks

[15] County of Los Angeles, Department of Parks and Recreation. "Los Angeles County Regional Open Space District: Find Open Space District Project in Your Area." Web site. Available at: http://gis.lacounty.gov/rposd/

[16] County of Los Angeles, Department of Parks and Recreation. Accessed on: 14 June 2010. "Los Angeles County Regional Open Space District: Find Open Space District Project in Your Area." Web site. Available at: http://gis.lacounty.gov/rposd/

TABLE 3.11-1
FUTURE PARK EXPANSION AND IMPROVEMENTS PROJECTS, Continued

Park/ Facility name	Location	Description of Improvement
Alarms George Washington Carver Drinking Fountains (Various Parks) George Washington Carver Park-Ball Field Renovation (Various Parks)		
Sibrie Park	1300 West El Segundo Boulevard, Compton	Installation of outdoor lighting at Gonzales Park, Kelly Park, Oaks Park, and Sibrie Park; general improvements to Sibrie Park

SOURCE: Los Angeles County Regional Park and Open Space District.

On Site

The proposed project would be located on the existing 38-acre Martin Luther King, Jr. Medical Center Campus at 12021 Wilmington Avenue in the unincorporated community of Willowbrook in the County. The proposed project site is less than 1 mile north of the City of Compton, less than 1 mile west of the City of Lynwood, and less than 1 mile south of the City of Los Angeles.

The proposed project site is a public facility that contains landscaped areas and open lawns (or green spaces) that are dispersed throughout the campus. Although they are not specifically designated as recreational areas, these green spaces, which are located at the entrance of the campus off Wilmington Avenue and throughout the campus, are accessible to the general public, staff, and visitors.

3.11.3 Significance Thresholds

The potential for the proposed project to result in impacts related to recreation was analyzed in relation to the questions contained in Appendix G of the State California Environmental Quality Act (CEQA) Guidelines. A project would normally be considered to have a significant impact to recreation when the potential for any one of the following two thresholds occurs:

- Increase in the use of existing neighborhoods and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated

- The construction or expansion of recreational facilities, which might have an adverse physical effect on the environment

3.11.4 Impact Analysis

The proposed project has been evaluated for conformity with the goals, objectives, and policies of the General Plan related to recreation. The potential for adverse impacts to recreational services has been evaluated based on information concerning current recreational services and the increased demand created by the proposed project. This analysis considered existing General Plan policies, goals, and

applicable regulations, as well as existing and proposed parks, open space, and recreation facilities within the proposed project area. The proposed project could potentially increase the use of existing parks and recreational areas, including state, County, and neighborhood parks. The proposed project includes the construction of a residential and a commercial/retail component that could result in population growth, which in turn could cause an increase in demand for parks and recreational services.

Substantial Physical Deterioration of Existing Facilities

Tier I

Tier I of the proposed project would generate temporary jobs during the construction phase of the proposed project, and would not be expected to result in the creation of long-term jobs during the operational phase of the proposed project. Neither temporary nor long-term employees of the proposed project would be anticipated to use recreational facilities extensively. Employees of the medical campus would most likely live in the nearby area or region and would continue to access recreational facilities near their respective personal residences. Therefore, there would be no anticipated significant direct impacts from Tier I of the proposed project that would cause substantial deterioration of any recreational facility. In addition, as indicated in Table 3.11-1, the County plans to renovate and expand numerous parks and recreational facilities within the proposed project vicinity, thus increasing the total recreational facilities and open space available.

Tier II

Tier II of the proposed project would develop up to 100 residential units, and thus would directly result in a relatively small amount of new residential population in the area. This new population would also be in the vicinity of recreational parks and facilities. As discussed in Section 3.9, Population and Housing, of this EIR, in 2000, the Willowbrook community, a census-designated place (CDP) in the unincorporated County, had an average of 3.97 persons per household. However, the average persons per household increased to 4.10 between 2006 and 2008.[17] Based on the Willowbrook community standard occupancy rate of 4.10 persons per unit, the proposed project would generate approximately 410 additional residents. According to the General Plan, the County's threshold for recreation and open space for subdivisions is 4 acres per 1,000 residents.[18] Thus, the proposed project would be expected to generate the need for 1.64 acres of recreational/open-space area. It is anticipated that the population growth from the proposed project would be expected to fall within the projected growth for the area. Therefore Tier II would not be expected to result in an increase in the use of existing neighborhoods and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Tier II of the proposed project would generate temporary jobs during the construction phase of the proposed project, and long-term jobs during the operational phase of the proposed project. Neither temporary nor long-term employees of the proposed project would be anticipated to use recreational facilities extensively. Employees of the medical campus would most likely live in the nearby area or region and would continue to access recreational facilities near their respective personal residences.

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[17] The 2006–2008 estimates represent the average characteristics of population and housing between January 2006 and December 2008 and do no represent any single point in time.

[18] County of Los Angeles, Department of Regional Planning. November 1980. *County of Los Angeles General Plan, Conservation, Open Space and Recreation Element*, p. II-3. Available at: http://planning.lacounty.gov/assets/upl/project/gp_web80-conservation-and-open-space.pdf

Therefore, there would be no anticipated significant direct impacts from the non-residential component of Tier II of the proposed project that would cause substantial deterioration of any recreational facility.

As discussed in Section 3.09, *Population and Housing,* of this EIR, neither temporary employees needed during the construction phase of the project nor permanent employees needed for long-term operation of the proposed project are anticipated to constitute substantial increases in new population to the area beyond adopted population projections. Employees are less likely to relocate for jobs in the retail industry. There tends to be a higher turnover in retail jobs due to the nature of these jobs; many of the jobs are hourly, part time and/or filled by students or employees that would be expected to terminate employment over time to take on more complex or different jobs in the future. Therefore, there would be no significant indirect impacts expected from employees of the medical and health facility in relation to an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. In addition, as indicated in Table 3.11.2-1, the County plans to renovate and expand numerous parks and recreational facilities within the proposed project vicinity, thus increasing the total recreational facilities and open space available.

Construction or Expansion of Recreational Facilities

Tier I

Tier I of the proposed project would not have an adverse physical effect on the environment as result of construction or expansion of recreational facilities. Tier I of the proposed project would not include construction of recreational facilities on the site and would not require the construction or expansion of new facilities. Open areas and landscaped areas within Tier I development of the campus may be utilized for walking or other passive recreational activities. These areas would occur within the existing campus, would not generate traffic beyond that anticipated for the Tier I portion of the proposed project, and would only serve employees and visitors coming to the campus for other primary purposes, thereby not attracting additional users beyond those using the medical facilities of the campus. Therefore, Tier I development would not have an adverse physical effect on the environment as result of construction or expansion of recreational facilities.

Tier II

Tier II of the proposed project would not have an adverse physical effect on the environment as result of construction or expansion of recreational facilities. Tier II of the proposed project would not include construction of recreational facilities on the site and would not require the construction or expansion of new facilities; however, Tier II may include various open space areas, pathways, and landscaped areas on site that could be used by campus visitors. The medical campus is approximately 38 acres in size. As illustrated in Table 2.4-1, the proposed project would retain 10 percent open space through use of landscape for the purpose of aesthetic designs / beautification and overall health and sustainability. In addition, the County Zoning Code requires a minimum of 10 percent open space. Thus, in order to comply with the County Zoning Code, the proposed project would need to maintain approximately 3.8 acres of open space (including undeveloped areas without structures such as buildings or parking structures). Tier II of the proposed project would be expected to entail recreational components such as the open space and other areas described above, that would serve the campus but these elements would be constructed in a manner that would avoid any adverse physical effect on the environment.

The proposed project includes pedestrian walkways and open space throughout portions of the proposed project area. These walkways would be primarily used by residents or visitors accessing the proposed dwelling units and by employees. Landscaping would include the planting of trees, shrubs, and groundcover around buildings and along pathways. These areas would occur within the existing campus, would not generate traffic beyond that anticipated for the Tier II portion of the proposed project, and would only serve employees and visitors coming to the campus for other primary purposes, thereby not attracting additional users beyond those using the medical facilities of the campus. Additionally, the County and surrounding jurisdictions have plans to complete improvements and to expand the existing recreational facilities in the area surrounding the proposed project site. Therefore, Tier II development would not have an adverse physical effect on the environment as result of construction or expansion of recreational facilities.

Cumulative Impacts

Tier I

The incremental impacts of the proposed project to recreational facilities and open space, when added to the related past, present, or reasonably foreseeable future projects listed in Section 2, *Project Description,* of this EIR, would be expected to be below the level of significance. The proposed project would not create substantial population growth that would increase the use of or require the construction or expansion of recreational or open space areas when added to cumulative future projects. As discussed above, there are numerous park renovations occurring and several park expansion projects proposed within a 5-mile radius of the proposed project. Tier I development would not result in a significant impact either in relation to an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or in relation to the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. All related projects would undergo CEQA review, and if warranted, would be expected to provide the appropriate amount of open space / recreational facilities, or provide mitigation as necessary.

Tier I of the proposed project would not have an individually significant impact on recreational resources and would not have a cumulatively considerable contribution that would cause the need for additional recreation facilities. When paired with related projects within an approximate 2.5-mile radius, Tier I of the proposed project would not have a cumulative impact related to recreational services. Residential projects when paired with Tier I of the proposed project could cause a cumulative impact. However, the residential-related projects in the surrounding area would not cause an unanticipated population growth that would cause the need for additional recreation facilities. Therefore, Tier I of the proposed project would not have a significant cumulative impact related to recreational services.

Tier II

Tier II of the proposed project is anticipated to include development of up to 100 residential units and up to 1,814,696 square feet of mixed-use development. The development of up to 100 residential units on the proposed project site would be expected to induce population shifts from the neighboring communities to the proposed project site. Tier II development would not result in a significant impact either in relation to an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or in relation to the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. As Tier II of the proposed project would not have an

individually significant impact on recreational resources and would not have a cumulatively considerable contribution that would cause the need for additional recreation facilities. When paired with related projects within an approximate 3-mile radius, Tier II of the proposed project would not have a cumulative impact related to recreational services. Residential projects when paired with Tier II of the proposed project could cause a cumulative impact. However, the residential-related projects in the surrounding area would not cause an unanticipated population growth that would cause the need for additional recreation facilities. Therefore, the proposed project would not have a significant cumulative impact related to recreational services.

3.11.5 Mitigation Measures

Tier I

An EIR is required to describe feasible mitigation measures that could minimize potentially significant adverse impacts. The analysis undertaken for this document determined that no potentially significant impacts to recreation would be expected to result from development of Tier I of the proposed project. Therefore, no mitigation measures are required.

Tier II

An EIR is required to describe feasible mitigation measures that could minimize potentially significant adverse impacts. The analysis undertaken for this document determined that no potentially significant impacts to recreation would be expected to result from development of Tier II of the proposed project. Therefore, no mitigation measures are required.

3.12 TRANSPORTATION AND TRAFFIC

As a result of the Initial Study, the County of Los Angeles (County) determined that the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in impacts to transportation and traffic.[1] Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts to transportation and traffic.

The analysis of transportation and traffic includes a description of the regulatory framework that guides the decision-making process, the existing conditions of the proposed project area, the thresholds used for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and the level of significance after mitigation is incorporated. The potential for impacts to transportation and traffic has been analyzed in accordance with Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and the methodologies and significance thresholds provided by the County and incorporated within the traffic related studies that were prepared for the proposed project (see Appendix H, *Traffic Study for the Martin Luther King Jr. Medical Campus Center Project*).[2,3] Additionally, the traffic analysis was completed according to four traffic impact analysis methodologies: the California Department of Transportation (Caltrans) methodology was used to evaluate highway segments and ramps that are located within Caltrans' jurisdiction; the County of Los Angeles methodology was used for roads and intersections located within County of Los Angeles' jurisdiction; the Congestion Management Program (CMP) methodology was used to evaluate the analysis locations within non-County jurisdictions including the Cities of Compton and Lynwood; and the City of Los Angeles methodology was used to evaluate study intersections located within the City of Los Angeles' jurisdiction.

3.12.1 Regulatory Framework

State

California Water Code

The proposed project is subject to the State of California Water Code, Division 12, Part 5, Chapter 1, Article 4, Section 31060, titled "Construction of Rights of Way."[4] Any mitigation measure required to be implemented in a state right-of-way would require a Caltrans Encroachment Permit. Caltrans recommends that large-sized trucks transporting construction materials and equipment be limited to off-peak commute periods and any heavy construction equipment that requires the use of oversize transport vehicles on state roadways or facilities would require a Caltrans transportation permit. The construction scenario defined for the proposed project would not require the transport of oversized vehicles on state facilities; however, highways that are under state jurisdiction and are operated by

[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc. Pasadena, CA.

[2] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[3] Linscott, Law, Greenspan Engineers. 27 May 2010. *Martin Luther King, Jr. Medical Center Updated Parking Review*. Prepared for: County of Los Angeles. Pasadena, CA.

[4] West's Annotated California Codes, 1984. *Water Code Sections 30000 to 38999. Official California Water Code Classification*. Vol. 69. St. Paul, Minnesota: West Publishing Company.

Caltrans may be used by oversized vehicles in order to travel to and access the site during construction related activities.

Regional

Southern California Association of Governments Regional Transportation Plan

The proposed project lies within the jurisdiction of the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP). The 2008 RTP presents the transportation vision for the six-county region through the year 2035. The focus of the RTP is to maintain and improve the existing transportation system that considers system preservation, system operation and management, improved coordination between land-use decisions and transportation investments, and strategic expansion of the system to accommodate future growth.[5] The RTP consists of two sections: a financially constrained plan and a strategic plan. Together, these two plans have seven goals:

- Maximize mobility and accessibility for all people and goods in the region
- Ensure travel safety and reliability for all people and goods in the region
- Preserve and ensure a sustainable regional transportation system
- Maximize the productivity of our transportation system
- Protect the environment, improve air quality and promote energy efficiency
- Encourage land use and growth patterns that complement our transportation investments and improve the cost-effectiveness of expenditures
- Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.[6]

Local

Metropolitan Transportation Authority Congestion Management Plan

The CMP is a State-mandated program passed in 1990 in the form of Proposition 111. The County of Los Angeles Metropolitan Transportation Authority (LACMTA) has implemented the CMP locally. The CMP system consists of a specific system of arterial roadways in addition to all freeways. The Los Angeles County CMP requires individual development projects of regional significance to be analyzed for traffic impacts. Under the Los Angeles County CMP guidelines, a Traffic Study / Traffic Impact Assessment (TIA) has been prepared for the proposed project to determine potential impacts.[7] The Los Angeles County's CMP standard is Level of service (LOS) D or better for roads and highways in the vicinity of the proposed project site. LOS is a measure of traffic operation condition whereby a letter grade, A through F, corresponding to progressively worsening operation conditions, is assigned to an intersection or roadway segment.

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[5] Southern California Association of Governments. May 2008. *Regional Transportation Plan*. Available at: http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/f2008RTP_Complete.pdf

[6] Southern California Association of Governments. May 2008. *Regional Transportation Plan*. Available at: http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/f2008RTP_Complete.pdf

[7] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project*. Prepared for: County of Los Angeles. Pasadena, CA.

County of Los Angeles General Plan

The Transportation element of the County of Los Angeles General Plan provides a summary of the existing conditions in the planning area, major issues, goals, and policies, as well as pertinent action programs related to traffic and circulation related to a variety of transportation systems (highway and local road networks, bus, rail, high speed rail, aviation network, harbors, bicycles, pedestrians, and rideshare). The Transportation element describes the major locations and corridors for existing and future travel based on land use patterns in order to develop a comprehensive, coordinated, and continuing transportation system for the County of Los Angeles. This document sets forth County policy on the transportation system by identifying a series of 41 policies. The following policies may be applicable to the proposed project:[8]

- **Policy 17.** Encourage provision of transit service at a reasonable cost to the users and the community.
- **Policy 24.** Encourage the efficient use and conservation of energy used in transportation.
- **Policy 31.** Support the development of a mass transportation system that will provide a viable alternative to the automobile.
- **Policy 33.** Support a public transit system that provides accessible service, particularly to the transit dependent.

3.12.2 Existing Conditions

The existing Martin Luther King, Jr. Medical Center Campus is located in a highly urbanized area that is accessible by an established transportation network. The transportation network includes regional and street systems. Staff, visitors, and other individuals accessing the proposed project site do so by using the regional and street systems which are described below.

The proposed project site is also serviced by a public transportation system that includes: the Metropolitan Transportation Authority, Downtown Area Short Hop, Renaissance Transit System, Gardena Municipal Bus Line, Rosewood Smart Shuttle, Lynwood Trolley, Torrance Transit System, Carson Circuit System, Long Beach Transit, and the Hahn Trolley Shuttle Service. The public transportation system is discussed further in this section.

Currently, the existing campus is not fully operational, but does provide various outpatient and administrative support services. The transportation systems mentioned above are used to access the current proposed project site.

Regional Roadway System

The proposed project is located approximately 3 miles north of State Route 91 (SR-91; Artesia Freeway), approximately 3 miles northeast of Interstate 710 (I-710; Long Beach Freeway), approximately 2 miles east of SR-110, less than 1 mile south of East Imperial Highway, and less than 1 mile south of I-105 (Glen Anderson Freeway). Primary regional access to the proposed project site is provided by these freeways. The I-105 Freeway, which runs in the east-west direction, south of the project site, connects with the SR-110 and I-710 Freeways, which run north-south. The SR-91 Freeway, which also runs east-west south of the project site, connects with the I-110 and I-710 Freeways.

[8] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

The arterials in the vicinity of the proposed project area provide regional and sub-regional access to the proposed project site include Imperial Highway, Wilmington Avenue, Central Avenue, El Segundo Boulevard, Alameda Street, 108th Street, 111th Street, 119th Street, 120th Street, Compton Avenue, Avalon Avenue, Willowbrook Avenue, Mona Boulevard, Rosecrans Avenue, Slater Street, and Success Avenue.

Local and sub-regional access and circulation opportunities within the proposed project area are provided by a grid network of major highways, secondary highways, collector streets, and selected local streets. These roads generally provide two to four travel lanes and allow parking on either side of the street. Typically, the speed limits range between 25 miles per hour (mph) and 35 mph.[9]

As part of the CMP and Caltrans analysis, 12 freeway segments are also analyzed. These locations include segments of the I-105 Freeway, the SR-110 Freeway, the I-710 Freeway, and the SR-91 Freeway.[10] A detailed Memorandum of Understanding (MOU) was prepared in coordination with the County of Los Angeles Department of Public Works. The MOU was used to establish the scope of the proposed project as well as other details related to traffic that were used to analyze the traffic related impacts of the proposed project (Appendix H).

Street System

The proposed project site is bounded on the north by East 120th Street; on the east by Wilmington Avenue; on the south by a narrow alley, which separates the proposed project site from the residential neighborhood that is largely located north of East 122nd Street; and on the west by Compton Avenue.

The roads that serve the immediate vicinity of the proposed project area along with their street classifications (per the County of Los Angeles' and City of Los Angeles' General Plan designation) are described below:

- Compton Avenue: Compton Avenue is a secondary arterial roadway. It runs in a north-south direction across several jurisdictions and defines the western boundary of the project site. The posted speed limit is 35 mph in the vicinity of the proposed project area. Within the proposed project area, the roadway generally offers four travel lanes, two lanes in each direction with a double yellow median. Parking is generally allowed along this roadway.

- 120th Street: 120th Street is a secondary arterial roadway that traverses in an east-west direction and defines the northern boundary of the proposed project site. This roadway provides four travel lanes, two lanes in each direction with a double yellow median. The posted speed limit is 25 mph. In the vicinity of the proposed project site, parking is allowed along this roadway. At Wilmington Avenue, this roadway becomes 119th Street. The 120th Street roadway continues east of Wilmington Avenue, south of 119th Street. This segment of 120th Street is a local street and provides two lanes, one lane in each direction. Parking is allowed along this roadway.

[9] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[10] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

- 119th Street: 119th Street begins east of Wilmington Avenue and is a continuation of 120th Street. 119th Street is a secondary arterial roadway that traverses in an east-west direction. This roadway offers two travel lanes, one lane per direction with a center left-turn median. Parking is allowed along this roadway. The posted speed limit along this facility is 25 mph.

- Wilmington Avenue: Wilmington Avenue is a major arterial roadway that runs in a north-south direction and defines the eastern boundary of the proposed project site. This roadway offers four travel lanes, two lanes per direction, and provides connection to the I-105 Freeway eastbound on-off ramps. Parking is allowed along this roadway. North of El Segundo Boulevard, the posted speed limit is 35 mph.

- El Segundo Boulevard: El Segundo Boulevard is an east-west major arterial roadway. The posted speed limit varies from 35 to 40 mph. The roadway generally offers six travel lanes, three lanes in each direction, with a central left-turn median. Parking is generally allowed along many stretches of this roadway within the project area. This roadway provides on- and off-ramps to the 110 Freeway.

- Imperial Highway: Imperial Highway is classified as a major arterial roadway and runs in an east-west direction north of the proposed project site. The posted speed limit is 40 mph. The roadway generally offers six travel lanes, three lanes in each direction, with a central left-turn median. Restricted on-street parking is allowed along this roadway. This roadway provides on- and off-ramps to the I-105 Freeway.

- Rosecrans Avenue: Rosecrans Avenue is a major arterial roadway that traverses in an east-west direction. This roadway offers four travel lanes, two lanes per direction with a raised median. This roadway provides connection to both the 110 Freeway and I-710 Freeway on-off ramps. Parking is allowed along this roadway. The posted speed limit is 40 mph.

- Avalon Boulevard: Avalon Boulevard is a major arterial roadway that runs in a north-south direction and offers four travel lanes, two lanes per direction. Parking is allowed along many stretches of this roadway. The posted speed limit is 35 mph.

- Central Avenue: Central Avenue is classified as a major arterial roadway that traverses in a north-south direction. The posted speed limit is 35 mph. The roadway generally offers four travel lanes, two lanes in each direction, with a central left-turn median and provides on- and off-ramps to the I-105 Freeway. Parking is allowed along this roadway within the proposed project area.

- Willowbrook Avenue (West): Willowbrook Avenue (West) is classified as a secondary arterial roadway that traverses in a north-east to south-west direction. The posted speed limit is 35 mph. The roadway generally offers two travel lanes, one lane in each direction, with a single, dashed, yellow median. Parking is allowed along the east side of this roadway within the proposed project area.

- Willowbrook Avenue (East): Willowbrook Avenue (East) is classified as a secondary arterial roadway that traverses in a north-east to south-west direction. The posted speed limit is 35 mph. The roadway generally offers two travel lanes, one lane in each

direction, with a single, dashed, yellow median. Parking is allowed along the west side of this roadway within the proposed project area.

- Mona Boulevard: Mona Boulevard is classified as a secondary arterial roadway that runs in a north-east to south-west direction. The posted speed limit is 40 mph. The roadway generally offers two travel lanes, one lane in each direction, with an undivided median. Parking is allowed along this roadway within the proposed project area.

- Alameda Street: Alameda Street is classified as a secondary arterial roadway that traverses in a north-east to south-west direction. The posted speed limit is 40 mph. The roadway generally offers four travel lanes, two lanes in each direction, with a central left-turn median. Parking is allowed along many stretched of this roadway within the proposed project area.

- 108th Street: 108th Street is classified as a secondary arterial roadway that traverses in east-west direction. The posted speed limit is 35 mph. The roadway generally offers two travel lanes, one lane in each direction, with a central left-turn median. Restricted on-street parking is allowed along this roadway within the proposed project area.

- 111th Street: 111th Street is classified as a collector roadway that traverses in an east-west direction. The posted speed limit is 25 mph. The roadway generally offers two travel lanes, one lane in each direction, with an undivided median. Restricted on-street parking is allowed along this roadway within the proposed project area.

- Success Avenue: Success Avenue is a local street that runs in a north-south direction. The speed limit is 25 mph. The roadway generally offers two travel lanes, one lane in each direction, with a single, dashed median. Restricted on-street parking is allowed along this roadway within the proposed project area.

- Slater Avenue: Slater Avenue is a local street that runs in a north-south direction. The speed limit is 25 mph. The roadway generally offers two travel lanes, one lane in each direction, with a single, dashed median. Restricted on-street parking is allowed along this roadway within the proposed project area.[11]

The roadway segment characteristics and existing lane configurations at each of the analyzed intersections are included in Appendix H of this EIR.

Levels of Service

Level of service is a qualitative measure used by the County of Los Angeles' CMP to describe conditions of traffic flow with a letter grade ranging from LOS A indicating excellent conditions to LOS F indicating overloaded conditions. The minimum acceptable LOS in the County of Los Angeles is LOS D in urban areas. The LOS definitions for signalized intersections are provided in Table 3.12.2-1, *Level of Service Definition for Signalized Intersections*. All of the analyzed intersections are controlled by traffic signals.

[11] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

TABLE 3.12.2-1
LEVEL OF SERVICE DEFINITION FOR SIGNALIZED INTERSECTIONS

Level of Service	Volume/Capacity Ratio	Definition
A	0.000-0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	>0.600-0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	>0.700-0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	>0.800-0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	>0.900-1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	>1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

SOURCE: Transportation Research Board, *Transportation Research Circular No. 212, Interim*

The Intersection Capacity Utilization (ICU) method of intersection analysis, per the County of Los Angeles traffic impact study guidelines for analyzing intersection conditions, was used to determine the intersection volume to capacity (V/C) ratio and corresponding level of service at each study intersection. A capacity of 1,600 vehicles per lane per hour and 2,880 for dual left-turn lanes was assumed in the capacity calculations in accordance with the guidelines.[12]

Existing Traffic Volumes

The 64 key intersections and highway segments were selected for evaluation based on coordination with the Los Angeles County Department of Public Works, Traffic and Lighting Division. Current and future traffic analyses were examined at these 64 intersections, which are located within the County of Los Angeles and several non-County jurisdictions as a part of this evaluation.[13] At these locations, traffic operations were studied prior to and after implementation of the proposed project, and deficiencies and impacts were identified. The intersections and highways that were evaluated within the roughly 2.5-mile-radius study area surrounding the proposed project site are located in, maintained and operated by Caltrans, the County of Los Angeles, and Cities of Compton, Los Angeles, and Lynwood jurisdictions.[14]

[12] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[13] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[14] For the purposes of the traffic analysis prepared for the proposed project, the ongoing campus improvements were evaluated as an existing baseline condition of the campus rather than a related project. Additionally, the related projects that were assessed at the intersections/streets, mostly appear within an approximately 2.5-mile radius.

As part of this analysis, detailed morning and evening peak period traffic counts on a commuter weekday were conducted and the peak hour traffic demands on the roadway system were identified. Weekday morning and evening peak hour traffic counts were compiled from data collected at the 64 analyzed intersections in January and April 2010.[15] These traffic volumes reflect typical weekday operations during current year 2010 conditions (Table 3.12.2-2, *Summary of Intersections Evaluated: Existing Conditions*, and Appendix H).[16]

TABLE 3.12.2-2
SUMMARY OF INTERSECTIONS EVALUATED: EXISTING CONDITIONS

#	Intersection	AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS
County of Los Angeles					
52	Alameda Street/103rd Street [1]	0.760	C	0.824	D
55	Alameda Street/El Segundo Boulevard [2]	0.621	B	0.731	C
54	Alameda Street/Imperial Highway [1]*	0.735	C	0.819	D
11	Avalon Boulevard/El Segundo Boulevard	0.603	B	0.738	C
12	Avalon Boulevard/Rosecrans Avenue	0.597	A	0.707	C
4	Broadway/El Segundo Boulevard	0.489	A	0.534	A
19	Central Avenue/El Segundo Boulevard [2]	0.748	C	0.821	D
20	Central Avenue/Rosecrans Avenue [2]	0.772	C	0.894	D
26	Compton Avenue/118th Street	0.365	A	0.314	A
27	Compton Avenue/120th Street	0.547	A	0.471	A
28	Compton Avenue/124th Street	0.309	A	0.257	A
25	Compton Avenue/Imperial Highway [3]**	0.795	C	0.669	B
49	I-105 Westbound Ramps/Imperial Highway [3,4]	0.814	D	0.790	C
5	Main Street/El Segundo Boulevard	0.529	A	0.588	A
51	Mona Boulevard/El Segundo Boulevard	0.541	A	0.560	A
50	Mona Boulevard/Imperial Highway [1,3]	0.725	C	0.780	C
7	San Pedro Street/El Segundo Boulevard	0.522	A	0.528	A
23	Success Avenue - Slater Avenue/120th Street	0.403	A	0.316	A
46	Willowbrook Avenue/119th Street	0.487	A	0.654	B
47	Willowbrook Avenue/El Segundo Boulevard	0.534	A	0.599	A
35	Wilmington Avenue/118th Street	0.686	B	0.670	B
36	Wilmington Avenue/120th Street-119th Street	0.718	C	0.703	C
38	Wilmington Avenue/124th Street	0.529	A	0.472	A
34	Wilmington Avenue/I-105 Eastbound Ramps [4]	0.725	C	0.726	C
37	Wilmington Avenue/MLK Hospital Driveway – 120th Street	0.479	A	0.482	A
39	Wilmington Avenue/El Segundo Boulevard [2]	0.758	C	0.808	D
33	Wilmington Avenue/Imperial Highway-Willowbrook Avenue [3]**	0.443	A	0.442	A
City of Compton					
56	Alameda Street/Compton Boulevard *	0.639	B	0.629	B
22	Central Avenue/Alondra Boulevard	0.639	B	0.681	B
21	Central Avenue/Compton Boulevard	0.671	B	0.689	B
29	Compton Avenue/El Segundo Boulevard	0.724	C	0.559	A

[15] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[16] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

TABLE 3.12.2-2
SUMMARY OF INTERSECTIONS EVALUATED: EXISTING CONDITIONS, Continued

#	Intersection	AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS
61	Slater Avenue/El Segundo Boulevard	0.553	A	0.499	A
48	Willowbrook Avenue/Rosecrans Avenue	0.709	C	0.761	C
42	Wilmington Avenue/Alondra Boulevard	0.584	A	0.661	B
41	Wilmington Avenue/Compton Boulevard	0.641	B	0.685	B
43	Wilmington Avenue/Greenleaf Boulevard	0.660	B	0.708	C
40	Wilmington Avenue/Rosecrans Avenue	0.803	D	0.829	D
44	Wilmington Avenue/Artesia Boulevard (N) [4]	0.779	C	0.772	C
45	Wilmington Avenue/Artesia Boulevard (S) [4]	0.698	B	0.729	C
City of Los Angeles					
10	Avalon Boulevard/120th Street	0.647	B	0.750	C
8	Avalon Boulevard/Century Boulevard	0.659	B	0.728	C
9	Avalon Boulevard/Imperial Highway**	0.606	B	0.713	C
14	Central Avenue/103rd Street**	0.684	B	0.750	C
18	Central Avenue/120th Street	0.724	C	0.696	B
13	Central Avenue/Century Boulevard**	0.715	C	0.752	C
15	Central Avenue/Imperial Highway**	0.656	B	0.747	C
17	Central Avenue/I-105 Eastbound Ramps [4]	0.747	C	0.694	B
16	Central Avenue/I-105 Westbound Ramps [4]	0.795	C	0.762	C
24	Compton Avenue/103rd Street**	0.455	A	0.526	A
62	Compton Avenue/108th Street	0.763	C	0.655	B
63	Compton Avenue/111th Street	0.649	B	0.613	B
3	Figueroa Street/El Segundo Boulevard	0.556	A	0.717	C
2	I-110 Northbound Ramps/El Segundo Boulevard [4]**	0.731	C	0.836	D
1	I-110 Southbound Ramps/El Segundo Boulevard [4]**	0.781	C	0.661	B
6	San Pedro Street/120th Street	0.598	A	0.594	A
30	Wilmington Avenue/103rd Street	0.621	B	0.507	A
64	Wilmington Avenue/111th Street	0.650	B	0.627	B
31	Wilmington Avenue/Santa Ana Boulevard (N)	0.576	A	0.597	A
32	Wilmington Avenue/Santa Ana Boulevard (S)	0.612	B	0.639	B
City of Lynwood					
53	Alameda Street/Martin Luther King Jr. Boulevard	0.748	C	0.686	B
58	Long Beach Boulevard/Imperial Highway	0.930	E	1.021	F
57	Long Beach Boulevard/Martin Luther King Jr. Boulevard	0.785	C	0.824	D
60	Long Beach Boulevard/I-105 Eastbound Ramps [4]	0.665	B	0.590	A
59	Long Beach Boulevard/I-105 Westbound Ramps [4]	0.475	A	0.660	B

SOURCE:
* Los Angeles County Congestion Management Program (CMP) monitoring location.
** Existing City of Los Angeles ATSAC/ATCS location. V/C ratio includes ATSAC/ATCS reduction of 0.10.

KEY:
[1] Shares jurisdiction with City of Lynwood.
[2] Shares jurisdiction with City of Compton.
[3] Shares jurisdiction with City of Los Angeles.
[4] Shares jurisdiction with Caltrans.

Existing on-site peak hour traffic counts were conducted at the existing driveways along 120th Street and Wilmington Avenue. Based on the observed driveway counts, the existing project site generates a total of 706 trips (528 inbound, 178 outbound) during the morning peak hour and 527 trips (124 inbound, 403 outbound) during the evening peak hour.[17]

Since the existing site is not fully operational, only a portion of the trips that the existing site can potentially generate are currently on the street system and accounted for in the existing traffic counts. The existing medical campus' has the potential to generate a net total of approximately 17,443 daily trips of which 1,184 trips (699 inbound, 485 outbound) would occur during the morning peak hour and 1,206 trips (507 inbound, 699 outbound) during the evening peak hour.

Currently, 63 of the 64 analyzed intersection locations are operating at acceptable LOS ratings (LOS D or better) both during the morning and evening peak hours.[18] At these locations, motorists experience little to tolerable amounts of delay. The remaining intersection, Long Beach Boulevard and Imperial Highway, is operating at LOS E in the AM peak hour and is operating at LOS F in the PM peak hour.[19]

Nine of the 64 signalized study intersections analyzed are controlled by the City of Los Angeles' Automated Traffic Surveillance and Control (ATSAC) System and Adaptive Traffic Control System (ATCS) and are part of the Harbor-Gateway ATSAC system. A capacity increase of 10 percent (0.07 V/C adjustments for ATSAC and 0.03 V/C adjustments for ATCS) was applied to reflect the benefits of ATSAC/ATCS control at these intersections.[20] The nine locations include:

- I-110 Northbound Ramps/El Segundo Boulevard
- I-110 Southbound Ramps/El Segundo Boulevard
- Avalon Boulevard/Imperial Highway
- Central Avenue/Century Boulevard
- Central Avenue/103rd Street
- Central Avenue/Imperial Highway
- Compton Avenue/Imperial Highway
- Compton Avenue/103rd Street
- Wilmington Avenue/Imperial Highway

LADOT has indicated that an additional nine of the intersections evaluated will become part of the Harbor-Gateway ATSAC system in mid-2010:[21]

- Avalon Boulevard/Century Boulevard
- Avalon Boulevard/120th Street
- Central Avenue/I-105 Westbound Ramps

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[17] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[18] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[19] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[20] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[21] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

- Central Avenue/I-105 Eastbound Ramps
- Central Avenue/120th Street
- Compton Avenue/108th Street
- Compton Avenue/111th Street
- I-105 Westbound Ramps/Imperial Highway
- Mona Avenue/Imperial Highway

Air Traffic

The nearest airport to the proposed project site is the Compton/Woodley Airport located at 961 Alondra Boulevard, approximately 2.1 miles south of the proposed project in the City of Compton. The Compton Airport is a County-owned public-use airport that offers flight training, accommodations for more than 200 planes, and several aviation clubs.

Existing Vehicular Emergency Access/Egress

Two fire stations are located within 2 miles of the proposed project site. Police protection services in the proposed project area are provided by the Los Angeles County Sheriff's Department's Century Station located approximately 0.8 mile northeast of the proposed project site. Existing roadways were planned and designed to support the needs of the facility. As a medical center campus, the existing campus is properly designed for emergency vehicle access.

Existing Parking Conditions

Parking is provided at the Martin Luther King, Jr. Medical Campus in seven designated parking areas including an on-site multi-level parking structure available for parking. A parking forecast prepared for the existing campus determined that approximately 1,915 parking spaces were required for Tier I of the proposed project on the existing campus due to the proximity of public transportation.[22] Additionally, parking utilization observations and counts at the existing campus have noted that there is a parking surplus on the campus of more than 41 percent during the peak parking demand hour (11:00 a.m.).[23] The following is a summary of the existing on-site parking spaces, which are either striped and/or signed:[24]

- Parking Lot Area A (Surface Parking – East):
  - 6 handicap-accessible parking spaces
  - 198 standard parking spaces
  - *204 total parking spaces*

- Parking Lot Area B (Surface Parking – East):
  - 18 handicap-accessible parking spaces
  - 110 standard parking spaces
  - *128 total parking spaces*

[22] Linscott, Law, Greenspan Engineers. 27 May 2010. *Martin Luther King, Jr. Medical Center Updated Parking Review*. Prepared for: County of Los Angeles. Pasadena, CA.

[23] Linscott, Law, Greenspan Engineers. 27 May 2010. *Martin Luther King, Jr. Medical Center Updated Parking Review*. Pasadena, CA. Utilization counts were conducted over the course of several days in April 2009 and May 2010 and were performed by Linscott, Law, Greenspan Engineers and The Traffic Solution for Linscott, Law, Greenspan Engineers.

[24] Linscott, Law, Greenspan Engineers. 27 May 2010. *Martin Luther King, Jr. Medical Center Updated Parking Review*. Pasadena, CA.

- Parking Lot Area C (Surface Parking – East):
  - 4 handicap-accessible parking spaces
  - 320 standard parking spaces
  - *324 total parking spaces*

- Parking Structure:
  - 11 handicap-accessible parking spaces
  - 490 standard parking spaces
  - *501 total parking spaces*

- Emergency Parking:
  - 2 handicap-accessible parking spaces
  - 1 standard parking spaces
  - 6 temporary parking spaces
  - *9 total parking spaces*

- Parking Lot Area E (Surface Parking – West):
  - 34 handicap-accessible parking spaces
  - 335 standard parking spaces
  - *369 total parking spaces*

- Parking Lot Area F (Surface Parking – West):
  - 8 handicap-accessible parking spaces
  - 140 standard parking spaces
  - *148 total parking spaces*

- Miscellaneous Surface Parking:
  - 84 loading dock and standard parking spaces
  - *84 total parking spaces*

Based on the parking summary listed above, approximately 1,767 parking spaces are currently provided on site in seven designated parking areas, as well as miscellaneous surface parking interspersed throughout the campus. The total 1,767 parking spaces are comprised of 1,678 standard spaces, 83 accessible spaces, and 6 temporary parking spaces.[25] Following completion of the CEQA-exempt ongoing project, there will be approximately 1,925 parking spaces on the campus.[26]

Existing Alternative Transportation Systems

The existing campus is currently accessible by public transportation. Twenty-four bus lines, including a 'Rapid Bus Line', currently serve in the vicinity of the study area. These bus lines are operated by the Metropolitan Transportation Authority (MTA), Los Angeles Department of Transportation Downtown Area Short Hop (LADOT-DASH), Renaissance Transit System, Gardena Municipal Bus Line, Rosewood Smart Shuttle, Lynwood Trolley, Torrance Transit System, Carson Circuit System, Long Beach Transit (LBT), and the Hahn Trolley Shuttle Service.

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[25] HMC Architects. 18 August 2010. *Martin Luther King, Jr. Medical Center Parking Inventory*. Prepared for: County of Los Angeles. Pasadena, CA.

[26] HMC Architects. 18 September 2009. Mart in Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report. Los Angeles, CA.

Bus transit service in the proposed project vicinity is available along the following travel corridors[27]:

- Rosecrans Avenue travel corridor
- Avalon Boulevard travel corridor
- Central Avenue travel corridor
- Wilmington Ave travel corridor
- Willowbrook Avenue travel corridor
- 120th Street travel corridor
- Imperial Highway travel corridor
- El Segundo Boulevard travel corridor

There are two bus stations located on the existing campus boundary: one bus station is located on the northern boundary on 120th Street, and one bus station is located on the eastern boundary on Wilmington Avenue.[28] A brief description of the bus lines that provide service in the vicinity of the proposed project site is provided below:

- MTA 26: Line 26 is a local north/south line that provides service from Los Angeles to Gardena and travels primarily along Avalon Boulevard within the study area. This line runs everyday, including holidays, at a peak frequency of approximately 10 minutes. The northern terminus is located at the intersection of Hollywood Boulevard and Rodney Drive in Los Angeles. The southern terminus is located at the Artesia Transit Center in Gardena.

- MTA 51/52/352: Lines 51/52/352 are local north/south lines that provide service from Los Angeles to Compton and travels primarily along Avalon Boulevard within the study area. These lines run everyday, including holidays, at a peak frequency of approximately 10 minutes. The northern terminus is located at the intersection of Wilshire/Vermont Metro Station in Los Angeles. The southern terminus is located at MLK, Jr. Transit Center Station in Compton.

- MTA 48: Line 48 is a local north/south line that provides service from Downtown Los Angeles to Willowbrook and travels primarily along 120th Street, Avalon Boulevard, and Imperial Highway within the study area. This line runs everyday, including holidays, at a peak frequency of approximately 10 minutes. The northern terminus is located at the intersection of Temple Street and Figueroa Street in Downtown Los Angeles. The southern terminus is located at the Avalon Green Line Station in Willowbrook.

- MTA 53: Line 53 is a local north/south line that provides service from Carson to Downtown Los Angeles and travels primarily along Central Avenue, 120th Street, Avalon Boulevard, and Imperial Highway within the study area. This line runs everyday, including holidays, at a peak frequency of approximately 10 minutes. The northern terminus is located at the intersection of Beaudry Avenue and 5th Street in

[27] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[28] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

Downtown Los Angeles. The southern terminus is located at California State University, Dominguez Hills in Carson.

- MTA 55/355: Line 55/355 is a local north/south line that provides service from Downtown Los Angeles to Willowbrook and travels primarily along Compton Avenue, 120th Street, and Wilmington Avenue within the study area. This line runs everyday, including holidays, at a peak frequency of approximately 15 minutes during peak commute hours. The northern terminus is located at the intersection of Sunset Boulevard and Figueroa Street in Downtown Los Angeles. The southern terminus is located at the Imperial/Wilmington/Rosa Parks Green Line Station in South Los Angeles.

- MTA 121: Line 121 is a local east/west line that provides service from Willowbrook to Whittier and travels primarily along Willowbrook Avenue and 119th Street within the study area. This line runs everyday, including holidays, at a peak frequency of approximately 20 minutes. The eastern terminus is located at the Whittwood Center in Whittier. The western terminus is located at the Imperial/Wilmington Station.

- MTA 125: Line 125 is a local east/west line that provides service from Norwalk to El Segundo and travels primarily along Rosecrans Avenue within the study area. This line runs everyday, including some holidays, at a peak frequency of approximately 15 minutes. The eastern terminus is located at the Norwalk Station in South Los Angeles. The western terminus is located at El Segundo Plaza in El Segundo.

- MTA 202: Line 202 is a local north/south line that provides service from Willowbrook to Wilmington and travels primarily along Willowbrook Avenue within the study area. This line runs Monday through Friday, including some holidays, at a peak frequency of approximately 30 minutes. The northern terminus is located at the Imperial/Wilmington/Rosa Parks Green Line Station in South Los Angeles. The southern terminus is located at the intersection of Avalon Boulevard and D Street in Wilmington.

- MTA 205: Line 205 is a local north/south line that provides service from Willowbrook to San Pedro and travels primarily along Wilmington Avenue within the study area. This line runs everyday, including holidays, at a peak frequency of approximately 20 minutes. The northern terminus is located at the Imperial/Wilmington/Rosa Parks Green Line Station in South Los Angeles. The southern terminus is located at the intersection of Gaffey Street/13th Street in San Pedro.

- MTA 305: Line 305 is a local north/south line that provides service from Willowbrook to Westwood and travels primarily along Wilmington Avenue, 119th Street, and Willowbrook Avenue within the study area. This line runs everyday, including holidays, at a peak frequency of approximately 40 minutes. The northern terminus is located at the UCLA Ackerman Loop in Westwood. The southern terminus is located at the Imperial/Wilmington/Rosa Parks Green Line Station in South Los Angeles.

- MTA 612: Line 612 is a local circulator route that provides service around Willowbrook area and primarily travels along Wilmington Avenue and Imperial Highway within the study area. This line runs everyday, including holidays, at a peak frequency of approximately 45 minutes.

- MTA 753: Line 753 is a north/south 'Rapid Bus Line' that provides service from Willowbrook to Downtown Los Angeles and travels primarily along Wilmington Avenue, 190th Street, Willowbrook Avenue, and Imperial Highway within the study area. This line runs Monday through Friday at a peak frequency of approximately 15 minutes. The northern terminus is at the intersection of Beaudry Avenue and 5th Street in Downtown Los Angeles. The southern terminus is at the Imperial/Wilmington Green Line Station in South Los Angeles.

- LADOT Dash Watts: This is a LADOT Dash line that provides service to the Watts area of Los Angeles. This line is a local circulator route that travels primarily along 120th Street within the study area. This line runs Monday through Saturday, including some holidays, at a peak frequency of approximately 20 minutes. The terminus is located at the Kenneth Hahn Plaza in Willowbrook.

- HTSS 1 – Line 1 is a local circulator route that provides service around the Willowbrook area and travels primarily along Wilmington Avenue within the study area. This line runs Monday through Saturday, including some holidays, at a peak frequency of approximately 30 minutes. The terminus is located at the Kenneth Hahn Plaza in Willowbrook.

- HTSS 2: Line 2 is a local circulator route that provides service around the Willowbrook area and travels primarily along Wilmington Avenue and 120th Street within the study area. This line runs Monday through Saturday, including some holidays, at a peak frequency of approximately 30 minutes. The terminus is at the Kenneth Hahn Plaza in Willowbrook.

- HTSS 3: Line 3 is a local circulator route that provides service around the Willowbrook area and travels primarily along Wilmington Avenue and 120th Street within the study area. This line runs Monday through Saturday, including some holidays, at a peak frequency of approximately 10 minutes. The terminus is at the Kenneth Hahn Plaza in Willowbrook.

- CRT Route 1: Route 1 is a local circulator route that provides service around the Willowbrook and Compton area and travels primarily along Rosecrans Avenue, Central Avenue and El Segundo Boulevard within the study area. This line runs Monday through Saturday, at a peak frequency of approximately 30 minutes. The terminus is at the transit center in Downtown Los Angeles.

- CRT Route 3: Route 3 is a local circulator route that provides service around the Willowbrook area and travels primarily along Central Avenue and El Segundo Boulevard within the study area. This line runs Monday through Saturday, at a peak frequency of approximately 30 minutes. The terminus is at the transit center in Downtown Los Angeles.

- CRT Route 5: Route 5 is a local circulator route that provides service around the Willowbrook area and travels primarily along Alameda Street and El Segundo Boulevard within the study area. This line runs Monday through Saturday, at a peak frequency of approximately 60 minutes. The terminus is at the transit center in Downtown Los Angeles.

- RSS: Rosewood Smart Shuttle is a local circulator route that provides service around the Willowbrook area and travels primarily along Avalon Boulevard and Imperial Highway within the study area. This line runs Monday through Friday, at a peak frequency of approximately 30 minutes. The terminus is at the Campanella Park (Stanford Avenue and Santa Rita Street) in South Los Angeles.

- GMB Line 5: Line 5 is a local east/west line that provides service from Willowbrook to El Segundo and travels primarily along El Segundo Boulevard within the study area. This line runs Monday through Friday, at a peak frequency of approximately 30 minutes. The eastern terminus is at the Imperial/Wilmington Station in South Los Angeles. The western terminus is at the intersection of El Segundo Boulevard and Sepulveda Boulevard in El Segundo.[29]

In addition, both the Metro Blue Line and Green Line have metro stations located approximately 0.5 mile northeast of the existing Martin Luther King, Jr. Medical Campus; the Blue Line and Green Line metro stations have a shuttle bus that transports individuals between the medical campus and Metro stations. The Rosa Parks Transit Station is located northeast of the proposed project site. This station houses the Blue Line and Green Line Metro stations. These rail lines are described below:

- MTA Green Line: The Green Line is a local east/west line that provides service from Norwalk to Redondo Beach and travels primarily along Glenn Anderson Freeway within the study area. This line runs everyday, including holidays, at a peak frequency of approximately 8 minutes during peak commute hours. The eastern terminus is located at Norwalk Green Line station. The western terminus is located at Redondo Beach Green Line station.

- MTA Blue Line: The Blue Line is a local north/south line that provides service from Long Beach to Los Angeles and travels primarily along Willowbrook Avenue within the study area. This line runs everyday, including holidays, at a peak frequency of approximately 10 minutes during peak commute hours. The northern terminus is located at the intersection of 7th Street/Metro Center in Downtown Los Angeles. The southern terminus is located at the Long Beach Transit Mall in Long Beach.[30]

The County Board of Supervisors currently funds the Hahn's Trolley and Shuttle Service, which provides shuttle services to the community surrounding the existing campus. Hahn's Trolley and Shuttle Service operates three interconnecting routes. The County also funds a van service, L.A. County Dial-A-Ride, in the community surrounding the campus that provides transportation service for senior citizens and people with disabilities who reside within the unincorporated areas of Willowbrook, Walnut Park, Florence/Graham, Athens, Rosewood, and Rancho Dominguez.

3.12.3 Significance Thresholds

The potential for the proposed project to result in impacts related to transportation and traffic was analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines. The

[29] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[30] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

project would normally be considered to have a significant impact to traffic and transportation systems when the potential for any one of the following thresholds occurs:

- Conflict with applicable plan, ordinance, or policy establishing measures of effectiveness for performance of circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit

- Conflict with applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks

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

- Result in inadequate emergency access

- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities

As previously noted, the traffic impact analysis was also completed according to four impactfour analysis methodologies: the Caltrans methodology was used to evaluate highway segments and ramps that are within Caltrans' jurisdiction; the County of Los Angeles methodology was used for roads and intersections located within the County of Los Angeles' jurisdiction; the CMP methodology was used to evaluate the locations within the non-County jurisdiction intersections including those within the Cities of Compton and Lynwood; and the City of Los Angeles methodology was used to evaluate the impacts for the analysis of locations within the City of Los Angeles jurisdiction.

The County of Los Angeles Department of Public Works has established threshold criteria that determine if a project has a significant traffic impact at a specific intersection. According to the criteria provided by the County of Los Angeles, a project impact is considered significant if the following conditions are met:

Pre-Project Conditions		Project-Related Increase in V/C Ratio
LOS	V/C Ratio	
C	0.71 – 0.80	equal to or greater than 0.040
D	0.81 – 0.90	equal to or greater than 0.020
E, F	> 0.91	equal to or greater than 0.010

Using these criteria, a project would not have a significant impact at an intersection if it is operating at LOS D after the addition of project traffic and the incremental change in the V/C ratio is less than 0.020. However, if the intersection is operating at a LOS F after the addition of project traffic and the incremental change in the V/C ratio is 0.010 or greater, the project would be considered to have a significant impact.[31]

[31] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

The L.A. County CMP threshold criteria were used to determine if the proposed project would have a significant impact at a specific intersection located within the Cities of Compton and Lynwood jurisdictions. According to the CMP criterion, the proposed project would result in significant traffic impact at an intersection if the intersection is operating at LOS F with the proposed project's traffic and the incremental increase due to the proposed project is equal to 0.02 or greater.

The City of Los Angeles Department of Transportation (LADOT) has established threshold criteria that determine if a project has a significant traffic impact at a specific intersection located within the City of Los Angeles' jurisdiction. According to the City of LA thresholds, a project impact is considered significant if the following conditions are met:

Intersection Condition with Project Traffic		Project-Related Increase in V/C Ratio
LOS	V/C Ratio	
C	0.701 – 0.800	equal to or greater than 0.040
D	0.801 – 0.900	equal to or greater than 0.020
E, F	> 0.901	equal to or greater than 0.010

Using these criteria, a project would not have a significant impact at an intersection if it is operating at LOS D after the addition of project traffic and the incremental change in the V/C ratio is less than 0.020. However, if the intersection is operating at a LOS F after the addition of project traffic and the incremental change in the V/C ratio is 0.010 or greater, the project would be considered to have a significant impact.[32]

3.12.4 Impact Analysis

This section analyzes the potential for significant impacts on transportation and traffic that would occur from implementation of the proposed project. A project's transportation and traffic impacts can be separated into three components: (1) short-term impacts due to construction, (2) long-term permanent impacts from project operation, and (3) cumulative impacts when taken into consideration with related projects.

Consistent with the traffic study that was completed for the proposed project, the impacts analysis includes an assessment of existing conditions, evaluation of future horizon year (2014) conditions without and with the Tier I project components, an evaluation of future horizon year (2020) conditions without and with the Tier II project components, determination of the proposed project's trip generation, distribution and assignment on the roadway network, an analysis of future conditions with the proposed project, identification of significant impacts, and identification of mitigation measures as applicable. [33]

Impacts

Due to the significant difference in the required approach to analyzing the two project tiers, transportation- and traffic-related impacts related to the proposed project are discussed with respect to Tier I impacts and Tier II impacts of the proposed project and are discussed according to the County,

[32] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[33] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

City of Los Angeles, and non-County jurisdictions consisting of the Cities of Compton and Lynwood, where appropriate.

This section analyzes the potential for significant impacts on transportation and traffic that would occur from implementation of the proposed project. As stated earlier, the impact analyses analysis include an assessment of existing conditions, evaluation of future horizon year (2014) conditions without and with the Tier I project components, an evaluation of future horizon year (2020) conditions without and with the Tier I and Tier II project components, determination of the proposed project's trip generation, distribution and assignment on the roadway network, an analysis of future conditions with the proposed project prior, identification of significant impacts and identification of mitigation measures as applicable.[34]

Construction Impacts

Tier I

Tier I of the proposed project would be expected to result in construction-related impacts. Tier I construction activities would contribute to temporary increases in the number of vehicles accessing the roads surrounding the proposed project site. The construction vehicles may be expected to cause delays that reduce the existing traffic service levels during peak hours and may be expected to result in impacts to transportation and traffic with regard to the traffic volumes and capacity on the surrounding street system. Construction of the proposed project would be expected to require a construction workers and hauling and delivery trucks to travel to and from the proposed project site over the construction period. However, no road closures would be anticipated as a result of Tier I of the proposed project. There will be no loss of access.

Construction-related trips associated with trucks and employees traveling to and from the site during Tier I of the proposed project construction, during the weekday and weekend hours of operations may result in some minor traffic delays; however, the potential traffic interference by construction vehicles would create temporary/short-term impacts. It would be anticipated that a majority of the construction-related traffic would utilize the neighboring highways to gain regional access to the site. Traffic impacts to the surface streets and adjacent roadway network would be at minimal a nuisance and would not be long-term, nor would they be expected to significantly contribute to traffic-related delays or impacts. Due to the fact that the site is currently not fully operational, and would not be fully operational during Tier I construction, it is anticipated that all roadway segments surrounding the proposed project site would continue to operate in a manner similar to operations under current conditions. However, due to the potential for traffic-related delays during construction, the proposed project would be expected to result in impacts to transportation and traffic on the existing traffic load and capacity of the street system. Incorporation of mitigation measures would be required to reduce these construction-related impacts to transportation and traffic to below the level of significance.

Tier II

Tier II of the proposed project would be expected to result in construction-related impacts. With a large square footage currently scheduled for construction activities, construction of the proposed project would be expected to require a large number of construction workers and a large number of hauling and delivery trucks to travel to and from the proposed project site over a long construction period. However, no road closures would be anticipated as a result of Tier II of the proposed project.

[34] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

Construction-related trips associated with trucks and employees traveling to and from the site during each tier of the proposed project construction, during the weekday and weekend hours of operations may result in additional traffic delays; however, the potential traffic interference by construction vehicles would create temporary/short-term impacts. It would be anticipated that a majority of the construction-related traffic would utilize the neighboring highways to gain regional access to the site. Traffic impacts to the surface streets and adjacent roadway network would be at anticipated during the construction of Tier II although they would not be long-term, nor would they be expected to significantly contribute to traffic-related delays or impacts. Due to the fact that the site is currently not fully operational, and would not be fully operational at the initiation of Tier II construction, it is possible that all roadway segments surrounding the proposed project site would experience some delays but would generally continue to operate in a manner similar to operations under current conditions, during construction of Tier II of the proposed project. However, Tier II of the proposed project does have the potential to result in traffic-related construction impacts, including, but not limited to, delays and changes in the traffic service levels during peak hours.

Therefore, construction of the proposed project would be expected to generate a large number of additional vehicle trips to and from the proposed project site and would be expected to result in impacts to transportation and traffic on the existing traffic load and capacity of the street system. Incorporation of mitigation measures would be required to reduce these construction-related impacts to transportation and traffic to below the level of significance.

Operational Impacts

Tier I

Tier I Impacts: County of Los Angeles. This evaluation is directed at the analysis of potential traffic impacts on the street system produced by the proposed project and includes an analysis of the following scenarios, based on the County of Los Angeles traffic study guidelines:

- Existing (2010) Conditions – The analysis of existing traffic conditions is intended to provide a basis for the remainder of this evaluation. The existing conditions analysis includes an assessment of streets, traffic volumes, and operating conditions.

- Existing Baseline with Ambient Growth (2014) Conditions – Future traffic conditions without the proposed project have been developed for the year 2014. The objective of this analysis is to project future traffic growth and operating conditions, which could be expected to result from regional growth in the vicinity of the project area by the year 2014. This scenario serves as the point of reference to compare the Tier I project conditions to, for estimation of traffic impacts.

- Existing Baseline with Ambient Growth (2014) plus Tier I Project Conditions – The net traffic expected to be generated by the proposed Tier I project is estimated and added to the Existing Baseline with Ambient Growth (2014) traffic forecasts. The impacts of the proposed Tier I project on future traffic operating conditions are then identified.

- Existing Baseline with Ambient Growth (2014) plus Tier I Project and Related Projects Conditions – The net traffic expected to be generated by the proposed Tier I project and related projects is estimated and added to the Existing Baseline with Ambient Growth (2014) traffic forecasts. The impacts of the cumulative projects (including the proposed Tier I project) on future traffic operating conditions are then identified.

The traffic scenarios for Cities of Los Angeles, Compton, and Lynwood study locations are based on the non-County operated jurisdictions standards and the CMP for Los Angeles County traffic study guidelines:

- Cumulative (2014) Base Conditions – Future traffic conditions without the proposed project has been developed for the year 2014. The objective of this analysis is to project future traffic growth and operating conditions, which could be expected to result from regional growth and related projects in the vicinity of the project area by the year 2014. This scenario serves as the point of reference to compare the Tier I project conditions to, for estimation of traffic impacts.

- Cumulative (2014) Plus Tier I Project Conditions – Same as Existing Baseline with Ambient Growth (2014) plus Tier I project and Related Projects Conditions.

The construction of Tier I would include construction of 156,700-square-foot MACC and ancillary buildings and the removal of four structures containing approximately 506,485 square feet. Tier I is estimated to generate a net total of -332 trips during the morning peak hour and -338 trips during the evening peak hour.[35]

The Existing Baseline with Ambient Growth (2014) without Tier I project and the Existing Baseline with Ambient Growth (2014) plus Tier I peak hour traffic volumes were analyzed at each of the County of Los Angeles study intersections (Table 3.12.4-1, *Tier I Summary of Intersection LOS: Existing Baseline with Ambient Growth (2014) Traffic Conditions*).

TABLE 3.12.4-1
TIER I SUMMARY OF INTERSECTION LOS: EXISTING BASELINE WITH AMBIENT GROWTH (2014) TRAFFIC CONDITIONS

#	Intersection	AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS
County of Los Angeles					
52	Alameda Street/103rd Street [1]	0.783	C	0.850	D
55	Alameda Street/El Segundo Boulevard [2]	0.638	B	0.753	C
54	Alameda Street/Imperial Highway [1]*	0.757	C	0.842	D
11	Avalon Boulevard/El Segundo Boulevard	0.621	B	0.762	C
12	Avalon Boulevard/Rosecrans Avenue	0.612	B	0.727	C
4	Broadway/El Segundo Boulevard	0.501	A	0.552	A
19	Central Avenue/El Segundo Boulevard [2]	0.775	C	0.848	D
20	*Central Avenue/Rosecrans Avenue [2]*	*0.793*	*C*	*0.922*	*E*
26	Compton Avenue/118th Street	0.378	A	0.326	A
27	Compton Avenue/120th Street	0.591	A	0.512	A
28	Compton Avenue/124th Street	0.319	A	0.267	A

[35] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

TABLE 3.12.4-1
TIER I SUMMARY OF INTERSECTION LOS: EXISTING BASELINE WITH AMBIENT GROWTH (2014) TRAFFIC CONDITIONS, Continued

#	Intersection	AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS
25	Compton Avenue/Imperial Highway [3]**	0.826	D	0.702	C
49	I-105 Westbound Ramps/Imperial Highway [3,4]**	0.749	C	0.728	C
5	Main Street/El Segundo Boulevard	0.542	A	0.606	B
51	Mona Boulevard/El Segundo Boulevard	0.556	A	0.579	A
50	Mona Boulevard/Imperial Highway [1,3]**	0.645	B	0.705	C
7	San Pedro Street/El Segundo Boulevard	0.537	A	0.542	A
23	Success Avenue - Slater Avenue/120th Street	0.437	A	0.359	A
46	Willowbrook Avenue/119th Street	0.502	A	0.677	B
47	Willowbrook Avenue/El Segundo Boulevard	0.548	A	0.618	B
35	Wilmington Avenue/118th Street	0.722	C	0.710	C
36	Wilmington Avenue/120th Street-119th Street	0.773	C	0.764	C
38	Wilmington Avenue/124th Street	0.561	A	0.519	A
34	Wilmington Avenue/I-105 Eastbound Ramps [4]	0.786	C	0.804	D
37	Wilmington Avenue/MLK Hospital Driveway – 120th Street	0.573	A	0.571	A
39	Wilmington Avenue/El Segundo Boulevard [2]	0.791	C	0.849	D
33	Wilmington Avenue/Imperial Highway-Willowbrook Avenue [3]**	0.471	A	0.487	A

SOURCE: Raju Associates, Inc. 2010
* Los Angeles County CMP monitoring location.
** City of Los Angeles ATSAC/ATCS location. V/C ratio includes ATSAC/ATCS reduction of 0.10.
[1] Shares jurisdiction with City of Lynwood.
[2] Shares jurisdiction with City of Compton.
[3] Shares jurisdiction with City of Los Angeles.
[4] Shares jurisdiction with Caltrans.

All 27 analyzed intersections in the morning peak hour and 26 analyzed intersections in the evening peak hour are projected to operate at LOS D or better.[36] The remaining intersection, Central Avenue/Rosecrans Avenue, in the evening peak hour is projected to operate at LOS E.

Based upon the findings of the traffic study, traffic in the vicinity of the proposed project area has been estimated to increase at a rate of about 0.72 percent per year.[37] This growth rate was obtained from the

[36] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[37] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

2004 CMP for Los Angeles County. Future increases in background traffic volumes due to regional growth and development are expected to continue at this rate. With an estimated Tier I completion date of 2014, the existing 2010 traffic volumes were adjusted upward by a factor of 2.88 percent to reflect this area-wide regional growth.[38]

The traffic generated by the Tier I project components would improve operating conditions from base conditions. The Tier I peak hour traffic volumes were analyzed at each of the County of Los Angeles study intersections (Appendix H).

Following implementation of the proposed project, all analyzed County of Los Angeles intersections are projected to operate at LOS D or better during both the morning and evening peak hours.[39] During the evening peak hour, the intersection of Central Avenue/Rosecrans Avenue is projected to operate at LOS E. However, overall, Tier I would result in the reduction of trips, all of the intersections would experience better operating conditions under Tier I. Therefore, Tier I would not cause a significant project traffic impact at any of the analyzed intersections.

Tier I Impacts: Non-County Jurisdictions. The traffic impact analysis for the study intersection in the Cities of Los Angeles, Compton, and Lynwood was completed by using the specified significant impact criteria included in their respective traffic study guidelines**.** Using the specified significant impact criteria, the traffic impacts at the 37 analysis locations in the Cities of Los Angeles, Compton, and Lynwood were determined for cumulative (2014) plus Tier I project conditions (Table 3.12.4-2, *Tier I: Non-County Operated Jurisdictions Impacts*, and Appendix H).

Tier I Freeway Impacts. According to the 2004 CMP impact criteria, a project impact is considered to be significant if the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C > = 0.02), causing or worsening LOS F (V/C > 1.00). Under this criterion, a project would not be considered to have a significant impact if the analyzed facility is operating at LOS E or better after the addition of project traffic. However, if the facility is operating at LOS F with project traffic and the incremental change in the V/C ratio caused by the project is 0.02 or greater, the project would be considered to have a significant impact. Using the CMP significant impact criteria, Tier I of the proposed project will not have any significant impacts during the AM and PM peak hours.

[38] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[39] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

TABLE 3.12.4-2
TIER I: NON-COUNTY JURISDICTIONS IMPACTS

#	Intersection	Peak Hour	Cumulative (2014) Base Conditions V/C	Cumulative (2014) Base Conditions LOS	Cumulative (2014) Plus Tier I Project V/C	Cumulative (2014) Plus Tier I Project LOS	Project Increase in V/C	Significant Impact
City of Compton [1]								
1	Alameda Street/Compton Boulevard *	AM	0.675	B	0.675	B	0.000	No
		PM	0.664	B	0.663	B	-0.001	No
2	Central Avenue/Alondra Boulevard	AM	0.668	B	0.668	B	0.000	No
		PM	0.717	C	0.717	C	0.000	No
3	Central Avenue/Compton Boulevard	AM	0.703	C	0.702	C	-0.001	No
		PM	0.727	C	0.726	C	-0.001	No
4	Compton Avenue/El Segundo Boulevard	AM	0.765	C	0.762	C	-0.003	No
		PM	0.586	A	0.583	A	-0.003	No
5	Slater Avenue/El Segundo Boulevard	AM	0.577	A	0.576	A	-0.001	No
		PM	0.519	A	0.518	A	-0.001	No
6	Willowbrook Avenue/Rosecrans Avenue	AM	0.767	C	0.765	C	-0.002	No
		PM	0.806	D	0.804	D	-0.002	No
7	Wilmington Avenue/Alondra Boulevard	AM	0.618	B	0.616	B	-0.002	No
		PM	0.701	C	0.698	B	-0.003	No
8	Wilmington Avenue/Compton Boulevard	AM	0.673	B	0.670	B	-0.003	No
		PM	0.723	C	0.721	C	-0.002	No
9	Wilmington Avenue/Greenleaf Boulevard	AM	0.686	B	0.684	B	-0.002	No
		PM	0.735	C	0.734	C	-0.001	No
10	Wilmington Avenue/Rosecrans Avenue	AM	0.850	D	0.844	D	-0.006	No
		PM	0.879	D	0.873	D	-0.006	No
11	Wilmington Avenue/Artesia Boulevard (N) [2]	AM	0.804	D	0.802	D	-0.002	No
		PM	0.802	D	0.800	C	-0.002	No
12	Wilmington Avenue/Artesia Boulevard (S) [2]	AM	0.718	C	0.718	C	0.000	No
		PM	0.754	C	0.753	C	-0.001	No
City of Los Angeles [3]								
13	Avalon Boulevard/120th Street**	AM	0.588	A	0.578	A	-0.010	No
		PM	0.697	B	0.689	B	-0.008	No
14	Avalon Boulevard/Century Boulevard**	AM	0.585	A	0.585	A	0.000	No
		PM	0.655	B	0.655	B	0.000	No
15	Avalon Boulevard/Imperial Highway**	AM	0.635	B	0.634	B	-0.001	No
		PM	0.745	C	0.744	C	-0.001	No
16	Central Avenue/103rd Street**	AM	0.711	C	0.711	C	0.000	No
		PM	0.782	C	0.781	C	-0.001	No
17	Central Avenue/120th Street**	AM	0.686	B	0.661	B	-0.025	No
		PM	0.672	B	0.647	B	-0.025	No
18	Central Avenue/Century Boulevard**	AM	0.752	C	0.751	C	-0.001	No
		PM	0.783	C	0.782	C	-0.001	No
19	Central Avenue/Imperial Highway**	AM	0.685	B	0.681	B	-0.004	No
		PM	0.783	C	0.781	C	-0.002	No
20	Central Avenue/I-105 Eastbound Ramps [2]**	AM	0.679	B	0.674	B	-0.005	No
		PM	0.626	B	0.621	B	-0.005	No
21	Central Avenue/I-105 Westbound Ramps [2]**	AM	0.726	C	0.723	C	-0.003	No
		PM	0.690	B	0.686	B	-0.004	No

TABLE 3.12.4-2
TIER I: NON-COUNTY OPERATED JURISDICTIONS IMPACTS, Continued

#	Intersection	Peak Hour	Cumulative (2014) Base Conditions V/C	Cumulative (2014) Base Conditions LOS	Cumulative (2014) Plus Tier I Project V/C	Cumulative (2014) Plus Tier I Project LOS	Project Increase in V/C	Significant Impact
22	Compton Avenue/103rd Street**	AM	0.473	A	0.472	A	-0.001	No
		PM	0.547	A	0.547	A	0.000	No
23	Compton Avenue/108th Street**	AM	0.701	C	0.699	B	-0.002	No
		PM	0.595	A	0.592	A	-0.003	No
24	Compton Avenue/111th Street**	AM	0.581	A	0.579	A	-0.002	No
		PM	0.543	A	0.540	A	-0.003	No
25	Figueroa Street/El Segundo Boulevard	AM	0.577	A	0.576	A	-0.001	No
		PM	0.749	C	0.748	C	-0.001	No
26	I-110 Northbound Ramps/El Segundo Boulevard [2]**	AM	0.770	C	0.768	C	-0.002	No
		PM	0.877	D	0.874	D	-0.003	No
27	I-110 Southbound Ramps/El Segundo Boulevard [2]**	AM	0.813	D	0.812	D	-0.001	No
		PM	0.694	B	0.692	B	-0.002	No
28	San Pedro Street/120th Street	AM	0.624	B	0.621	B	-0.003	No
		PM	0.617	B	0.615	B	-0.002	No
29	Wilmington Avenue/103rd Street	AM	0.641	B	0.641	B	0.000	No
		PM	0.530	A	0.528	A	-0.002	No
30	Wilmington Avenue/111th Street	AM	0.688	B	0.682	B	-0.006	No
		PM	0.670	B	0.664	B	-0.006	No
31	Wilmington Avenue/Santa Ana Boulevard (N)	AM	0.606	B	0.601	B	-0.005	No
		PM	0.634	B	0.631	B	-0.003	No
32	Wilmington Avenue/Santa Ana Boulevard (S)	AM	0.645	B	0.640	B	-0.005	No
		PM	0.676	B	0.673	B	-0.003	No
City of Lynwood [1]								
33	Alameda Street/Martin Luther King Jr. Boulevard	AM	0.783	C	0.782	C	-0.001	No
		PM	0.723	C	0.719	C	-0.004	No
34	Long Beach Boulevard/Imperial Highway	AM	0.964	E	0.962	E	-0.002	No
		PM	1.060	F	1.058	F	-0.002	No
35	Long Beach Boulevard/Martin Luther King Jr. Boulevard	AM	0.814	D	0.814	D	0.000	No
		PM	0.854	D	0.853	D	-0.001	No
36	Long Beach Boulevard/I-105 Eastbound Ramps [2]	AM	0.690	B	0.690	B	0.000	No
		PM	0.610	B	0.610	B	0.000	No
37	Long Beach Boulevard/I-105 Westbound Ramps [2]	AM	0.493	A	0.493	A	0.000	No
		PM	0.685	B	0.685	B	0.000	No

SOURCE: Raju Associates, Inc., 2010.

KEY:

* Los Angeles County Congestion Management Program (CMP) monitoring location.

** City of Los Angeles ATSAC/ATCS location. V/C ratio includes ATSAC/ATCS reduction of 0.10.

[1] Determination of significant impacts based on Los Angeles County Congestion Management Program (CMP) significant impact criteria.

[2] Shares jurisdiction with Caltrans.

[3] Determination of significant impacts based on City of Los Angeles significant impact criteria.

Of the 37 analyzed intersections in non-County jurisdictions, none would be significantly impacted by the components of the proposed Tier I project. Therefore, impacts are considered to be less than significant and no mitigation measures are required.

Tier II

Tier II of the proposed project, by itself, is anticipated to generate a net total of 1,572 trips during the morning peak hour and 2,091 trips during the evening peak hour. Due to the mixed-use nature of the project, some of the proposed project trips would remain internal. Thus, the Tier II project components of the proposed project would have a total net trip generation of 1,240 trips (918 inbound, 322 outbound) during the morning peak hour and 1,753 trips (571 inbound, 1,182 outbound) during the evening peak hour. Table 3.12.4-3, *Estimated Project Trip Generation: Tier I and Tier II*, summarizes the trip generation of the project including both Tier I and Tier II components.

TABLE 3.12.4-3
ESTIMATED PROJECT TRIP GENERATION: TIER I AND TIER II

			AM Peak Hour			PM Peak Hour		
	Size	Daily	In	Out	Total	In	Out	Total
Baseline including Existing								
Hospital	1,243,692 s.f.	20,521	822	571	1,393	596	822	1,418
Baseline Trip Generation Total Less Transit Reduction (15%)		17,443	699	485	1,184	507	699	1,206
Proposed Tier I								
Hospital - Removal of Use [1]	(506,485) s.f.	(8,357)	(335)	(232)	(567)	(242)	(335)	(577)
Hospital - Addition	156,700 s.f.	2,586	104	72	176	75	104	179
Tier I Net Trip Generation Total		(5,771)	(231)	(160)	(391)	(167)	(231)	(398)
Tier I Net Trip Generation Less Transit Reduction (15%)		**(4,905)**	**(196)**	**(136)**	**(332)**	**(142)**	**(196)**	**(338)**
Baseline + Tier I Total On-Site Trips		**12,538**	**503**	**349**	**852**	**365**	**503**	**868**
Proposed Tier II								
Hospital (Additional Campus Support)	1,134,695 s.f.	18,722	750	521	1,271	543	751	1,294
Commercial/Retail	80,000 s.f.	5,874	82	53	135	269	279	548
Single Family Residential	100 d.u.	1,040	20	60	80	66	39	105
Medical Office	300,000 s.f.	10,839	545	145	690	280	758	1,038
General Office	150,000 s.f.	1,823	228	31	259	42	205	247
Tier II Trip Generation Total		38,298	1,625	810	2,435	1,200	2,032	3,232
Tier II Trip Generation Total Less Transit Reduction (15%)		32,553	1,381	689	2,070	1,020	1,727	2,747
*Internal Capture Trip Credit (15% - Existing + Tier I + II)		(6,764)	(219)	(220)	(439)	(271)	(271)	(542)
**Pass-By Trip Credit [2]		(1,207)	(45)	(15)	(60)	(39)	(75)	(114)
Tier II Net Trip Generation Total		**24,582**	**1,117**	**455**	**1,572**	**710**	**1,381**	**2,091**
Tier I + Tier II Net Trip Generation Total		**19,677**	**921**	**319**	**1,240**	**568**	**1,185**	**1,753**
Baseline + Tier I + Tier II Total On-Site Trips		**37,120**	**1,620**	**804**	**2,424**	**1,075**	**1,884**	**2,959**

SOURCE: Raju Associates, Inc., 2010.
KEY:
* Internal capture credit taken after reduction of transit trips.
** Pass-by trip reduction taken after transit trip and internal capture credits.
[1] Demolition of this facility would occur in Tier II.
[2] Includes 10% pass-by credit for medical office use and retail use.

The traffic study completed for the proposed project evaluates the County of Los Angeles intersection locations, following completion of both Tier I and Tier II of the proposed project in the year 2020 (Appendix H, and Table 3.12.4-4, *Proposed Project and Ambient Growth).*

3.12.4-4
PROPOSED PROJECT AND AMBIENT GROWTH

#	Intersection	AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS
County of Los Angeles					
1	Alameda Street/103rd Street [1]	0.820	D	0.890	D
2	Alameda Street/El Segundo Boulevard [2]	0.672	B	0.788	C
3	Alameda Street/Imperial Highway [1]*	0.803	D	0.877	D
4	Avalon Boulevard/El Segundo Boulevard	0.647	B	0.795	C
5	Avalon Boulevard/Rosecrans Avenue	0.638	B	0.755	C
6	Broadway/El Segundo Boulevard	0.523	A	0.573	A
7	Central Avenue/El Segundo Boulevard [2]	0.822	D	0.888	D
8	Central Avenue/Rosecrans Avenue [2]	0.830	D	0.964	E
9	Compton Avenue/118th Street	0.400	A	0.356	A
10	Compton Avenue/120th Street	0.673	B	0.669	B
11	Compton Avenue/124th Street	0.335	A	0.285	A
12	Compton Avenue/Imperial Highway [3]**	0.887	D	0.752	C
13	I-105 Westbound Ramps/Imperial Highway [3,4]**	0.830	D	0.795	C
14	Main Street/El Segundo Boulevard	0.564	A	0.632	B
15	Mona Boulevard/El Segundo Boulevard	0.588	A	0.611	B
16	Mona Boulevard/Imperial Highway [1,3]**	0.686	B	0.751	C
17	San Pedro Street/El Segundo Boulevard	0.556	A	0.566	A
18	Success Avenue - Slater Avenue/120th Street	0.491	A	0.442	A
19	Willowbrook Avenue/119th Street	0.543	A	0.718	C
20	Willowbrook Avenue/El Segundo Boulevard	0.580	A	0.654	B
21	Wilmington Avenue/118th Street	0.848	D	0.826	D
22	Wilmington Avenue/120th Street-119th Street	0.927	E	0.969	E
23	Wilmington Avenue/124th Street	0.653	B	0.601	B
24	Wilmington Avenue/I-105 Eastbound Ramps [4]	0.917	E	0.990	E
25	Wilmington Avenue/MLK Hospital Driveway – 120th Street	0.833	D	0.915	E
26	Wilmington Avenue/El Segundo Boulevard [2]	0.840	D	0.923	E
27	Wilmington Avenue/Imperial Highway-Willowbrook Avenue [3]**	0.564	A	0.563	A

SOURCE: Raju Associates, Inc., 2010.
* Los Angeles County Congestion Management Program (CMP) monitoring location.
** City of Los Angeles ATSAC/ATCS location. V/C ratio includes ATSAC/ATCS reduction of 0.10.
KEY:
[1] Shares jurisdiction with City of Lynwood.
[2] Shares jurisdiction with City of Compton.
[3] Shares jurisdiction with City of Los Angeles.
[4] Shares jurisdiction with Caltrans.

Twenty-five (25) of the 27 analyzed County of Los Angeles intersections are projected to operate at LOS D or better during the morning peak hour. [40] However, during the evening peak hour, five intersections are projected to operate at LOS E:

- Central Avenue/Rosecrans Avenue: PM Peak Hour – LOS E
- Wilmington Avenue/120th Street-119th Street: AM and PM Peak Hours – LOS E
- Wilmington Avenue/I-105 Eastbound Ramps: AM and PM Peak Hours – LOS E
- Wilmington Avenue/MLK Hospital Driveway-120th Street: PM Peak Hour – LOS E
- Wilmington Avenue/El Segundo Boulevard: PM Peak Hour – LOS E[41]

Tier II Impacts in 2020. The proposed project build-out year, 2020 conditions were analyzed in the traffic study utilizing the methodologies and assumptions of the County of Los Angeles and non-County jurisdictions' (i.e., City of Los Angeles, Cities of Compton and Lynwood) traffic study guidelines. The results were then used to assess the potential project impacts and cumulative impacts of the Proposed Tier II Project on the local street system.[42] Table 3.12.4-5, *Future 2020 with Project*, illustrates the traffic operations under the future 2020 without and with project conditions for County of Los Angeles locations.

Tier II 2020 Freeway Impacts. When both tiers of the proposed project are considered in the project build-out year of 2020, traffic at certain freeway segments of the I-105, I-710 and I-110 would be reduced to LOS E or LOS F conditions during the AM and PM peak hours. However, some of these freeway segments are currently operating at LOS E and LOS F during the peak hours.

Approximately 21% of the analyzed freeway segments located within the study area would operate at LOS D or better during the AM peak hour. Approximately 21% and 58% would operate at LOS E and LOS F, respectively. During the PM peak hour, approximately 29% of the analyzed freeway segment within the study area would operate at LOS D or better and 13% and 58% would operate at LOS E and LOS F, respectively. These impacts are driven by Tier II of the proposed project.

[40] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[41] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[42] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

TABLE 3.12.4-5
FUTURE 2020 WITH PROJECT

#	Intersection	Peak Hour	Existing (Baseline) + Ambient (2020)		Existing (Baseline) + Ambient (2020) with Tier I & II Project		Project Increase in V/C	Significant Impact
			V/C	LOS	V/C	LOS		
County of Los Angeles								
52	Alameda Street/103rd Street [1]	AM	0.812	D	0.820	D	0.008	No
		PM	0.880	D	0.890	D	0.010	No
55	Alameda Street/El Segundo Boulevard [2]	AM	0.661	B	0.672	B	0.011	No
		PM	0.781	C	0.788	C	0.007	No
54	Alameda Street/Imperial Highway [1]*	AM	0.785	C	0.803	D	0.018	No
		PM	0.872	D	0.877	D	0.005	No
11	Avalon Boulevard/El Segundo Boulevard	AM	0.642	B	0.647	B	0.005	No
		PM	0.788	C	0.795	C	0.007	No
12	Avalon Boulevard/Rosecrans Avenue	AM	0.634	B	0.638	B	0.004	No
		PM	0.753	C	0.755	C	0.002	No
4	Broadway/El Segundo Boulevard	AM	0.520	A	0.523	A	0.003	No
		PM	0.569	A	0.573	A	0.004	No
19	Central Avenue/El Segundo Boulevard [2]	AM	0.803	D	0.822	D	0.019	No
		PM	0.879	D	0.888	D	0.009	No
20	Central Avenue/Rosecrans Avenue [2]	AM	0.824	D	0.83	D	0.006	No
		PM	0.956	E	0.964	E	0.008	No
26	Compton Avenue/118th Street	AM	0.391	A	0.400	A	0.009	No
		PM	0.336	A	0.356	A	0.020	No
27	Compton Avenue/120th Street	AM	0.610	B	0.673	B	0.063	No
		PM	0.527	A	0.669	B	0.142	No
28	Compton Avenue/124th Street	AM	0.330	A	0.335	A	0.005	No
		PM	0.274	A	0.285	A	0.011	No
25	Compton Avenue/Imperial Highway [3]**	AM	0.860	D	0.887	D	0.027	**Yes**
		PM	0.731	C	0.752	C	0.021	No
49	I-105 Westbound Ramps/Imperial Highway [3,4]**	AM	0.779	C	0.830	D	0.051	**Yes**
		PM	0.759	C	0.795	C	0.036	No
5	Main Street/El Segundo Boulevard	AM	0.561	A	0.564	A	0.003	No
		PM	0.628	B	0.632	B	0.004	No
51	Mona Boulevard/El Segundo Boulevard	AM	0.574	A	0.588	A	0.014	No
		PM	0.599	A	0.611	B	0.012	No
50	Mona Boulevard/Imperial Highway [1,3]**	AM	0.673	B	0.686	B	0.013	No
		PM	0.734	C	0.751	C	0.017	No
7	San Pedro Street/El Segundo Boulevard	AM	0.554	A	0.556	A	0.002	No
		PM	0.563	A	0.566	A	0.003	No
23	Success Avenue - Slater Avenue/120th Street	AM	0.452	A	0.491	A	0.039	No
		PM	0.367	A	0.442	A	0.075	No
46	Willowbrook Avenue/119th Street	AM	0.519	A	0.543	A	0.024	No
		PM	0.699	B	0.718	C	0.019	No
47	Willowbrook Avenue/El Segundo Boulevard	AM	0.567	A	0.580	A	0.013	No
		PM	0.641	B	0.654	B	0.013	No
35	Wilmington Avenue/118th Street	AM	0.746	C	0.848	D	0.102	**Yes**
		PM	0.735	C	0.826	D	0.091	**Yes**
36	Wilmington Avenue/120th Street-119th Street	AM	0.800	C	0.927	E	0.127	**Yes**
		PM	0.792	C	0.969	E	0.177	**Yes**
38	Wilmington Avenue/124th Street	AM	0.581	A	0.653	B	0.072	No
		PM	0.533	A	0.601	B	0.068	No

TABLE 3.12.4-5
FUTURE 2020 WITH PROJECT, Continued

#	Intersection	Peak Hour	Existing (Baseline) + Ambient (2020)		Existing (Baseline) + Ambient (2020) with Tier I & II Project		Project Increase in V/C	Significant Impact
			V/C	LOS	V/C	LOS		
34	Wilmington Avenue/I-105 Eastbound Ramps [4]	AM	0.812	D	0.917	E	0.105	**Yes**
		PM	0.830	D	0.990	E	0.160	**Yes**
37	Wilmington Avenue/MLK Hospital Driveway – 120th Street	AM	0.585	A	0.833	D	0.248	**Yes**
		PM	0.583	A	0.915	E	0.332	**Yes**
39	Wilmington Avenue/El Segundo Boulevard [2]	AM	0.819	D	0.840	D	0.021	**Yes**
		PM	0.879	D	0.923	E	0.044	**Yes**
33	Wilmington Avenue/Imperial Highway-Willowbrook Ave [3]**	AM	0.492	A	0.564	A	0.072	No
		PM	0.506	A	0.563	A	0.057	No

KEY:
* Los Angeles County Congestion Management Program (CMP) monitoring location.
[1] Shares jurisdiction with City of Lynwood.
[2] Shares jurisdiction with City of Compton.
[3] Shares jurisdiction with City of Los Angeles.
[4] Shares jurisdiction with Caltrans.

From Table 3.12.4-5, an assessment of project traffic impacts for Los Angeles County locations was conducted. Seven (7) of the 27 analyzed intersections would be significantly impacted by the Tier II project during the morning peak hour and 5 intersections would be significantly impacted during the evening peak hour:[43]

- Compton Avenue/Imperial Highway – AM Peak Hour
- I-105 Westbound Ramps/Imperial Highway – AM Peak Hour
- Wilmington Avenue/118th Street – AM and PM Peak Hours
- Wilmington Avenue/120th Street-119th Street – AM and PM Peak Hours
- Wilmington Avenue/I-105 Eastbound Ramps – AM and PM Peak Hours
- Wilmington Avenue/MLK Jr. Hospital Dwy-120th Street – AM and PM Peak Hours
- Wilmington Avenue/El Segundo Boulevard – AM and PM Peak Hours.[44]

Tier II Freeway Impacts. Using the CMP significant impact criteria, Tier II of the proposed project would have significant impacts at three of the analyzed freeway segments during the AM and/or PM peak hours.

The impacted freeway segments include the following:

- I-105 Freeway west of Long Beach Boulevard – westbound direction (AM Peak Hour)
- I-105 Freeway west of Long Beach Boulevard – eastbound direction (PM Peak Hour)
- I-105 Freeway west of I-710 Freeway – eastbound direction (PM Peak Hour)

[43] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

[44] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King, Jr. Medical Campus Center Project.* Prepared for: County of Los Angeles. Pasadena, CA.

Thus, the proposed project Tier II would result in significant project traffic impacts that would require the incorporation of mitigation measures to reduce the significant impacts to below the level of significance.

Air Traffic Patterns

Tier I

Tier I of the proposed project would not result in impacts to transportation and traffic in relation to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. The nearest airport to the proposed project site is the Compton/Woodley Airport located approximately 2.1 miles south of the proposed project in the City of Compton. There would be no change in relation to existing air traffic patterns as a result of the proposed project. Therefore, Tier I of the proposed project would not result in significant impacts in relation to air traffic patterns that would result in substantial safety risks.

Tier II

Tier II of the proposed project would not result in impacts to transportation and traffic in relation to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. The nearest airport to the proposed project site is the Compton/Woodley Airport located approximately 2.1 miles south of the proposed project in the City of Compton. There would be no change in relation to existing air traffic patterns as a result of the proposed project. Therefore, Tier II of the proposed project would not result in significant impacts in relation to air traffic patterns that would result in substantial safety risks.

Hazardous Roadway Design

Tier I

Implementation of Tier I the proposed project would result in less than significant impacts from hazards due to a design feature. The proposed project would involve a physical change in the environment; however, any construction-induced traffic would not be expected to result in increased hazards related to traffic engineering design features or incompatible uses. The proposed project site is connected by a network of well-defined and pre-existing paved roads including 120th Street to the north and Wilmington Avenue to the east. The proposed project site would continue to be accessed by these roads following construction of Tier I the proposed project. There impacts related to an increase in hazards due to a design feature would be less than significant.

Tier II

Implementation of Tier II the proposed project would result in less than significant impacts from hazards due to a design feature. The proposed project would involve a physical change in the environment; however, any construction-induced traffic would not be expected to result in increased hazards related to traffic engineering design features or incompatible uses. The proposed project site is connected by a network of well-defined and pre-existing paved roads including 120th Street to the north and Wilmington Avenue to the east. The proposed project site would continue to be accessed by these roads following construction of Tier II the proposed project. There impacts related to an increase in hazards due to a design feature would be less than significant.

Emergency Vehicle Access/Egress

Tier I

As stated above, Tier I the proposed project would not significantly alter any existing emergency access routes nor change existing patterns of emergency access. The proposed project may require the identification of multiple alternate ingress/egress access points for the circulation of traffic and emergency response vehicles. However, it is anticipated that these access points will be readily available as the campus is designed as an services emergency provider/destination.

There are two fire stations are located within 2 miles from the proposed project site. Additionally, law enforcement protection services in the proposed project area are provided by the Los Angeles County Sheriff's Department's Century Station, located approximately 0.8 mile northeast from the proposed project site. Although there would be additional traffic generated by implementation of the proposed project, the proposed project would result in traffic levels that significantly surpass the amount of traffic entitled in such a manner that it would result in inadequate emergency access to the proposed project site. Existing roadways were planned and designed to support the anticipated needs of the facility and it is anticipated that these roadways would be able to provide adequate emergency access to the proposed project site, and no additional access roads would need to be constructed to assist in the provision of adequate emergency access. As a medical center campus, the proposed project would be required to ensure that the project is properly designed for emergency vehicle access (e.g., driveway widths and turning radius allowances). Therefore, Tier I of the proposed project would not result in less than significant impacts with regard to inadequate emergency access.

Tier II

As stated above, Tier II of the proposed project would not significantly alter any existing emergency access routes nor change existing patterns of emergency access. The proposed project may require the identification of multiple alternate ingress/egress access points for the circulation of traffic and emergency response vehicles. However, it is anticipated that these access points will be readily available as the campus is designed as an emergency services provider/destination.

There are two fire stations located within 2 miles from the proposed project site. Additionally, law enforcement protection services in the proposed project area are provided by the Los Angeles County Sheriff's Department's Century Station, located approximately 0.8 mile northeast from the proposed project site. Although there would be additional traffic generated by implementation of the proposed project, the proposed project would result in traffic levels that significantly surpass the amount of traffic entitled in such a manner that it would result in inadequate emergency access to the proposed project site. Existing roadways were planned and designed to support the anticipated needs of the facility and it is anticipated that these roadways would be able to provide adequate emergency access to the proposed project site, and no additional access roads would need to be constructed to assist in the provision of adequate emergency access. As a medical center campus, the proposed project would be required to ensure that the project is properly designed for emergency vehicle access (e.g., driveway widths and turning radius allowances). Therefore, Tier II of the proposed project would not result in less than significant impacts with regard to inadequate emergency access.

Parking Capacity

Tier I

Although a detailed discussion of the anticipated parking impacts related to the project is not required by CEQA, it is anticipated that the proposed project site work would consist of a new parking terrace, new parking lots, re-striping of existing lots, and new landscaping at the entry of the new Multi-Service Ambulatory Care Center (MACC) and its surrounding area. Tier I would provide a parking terrace to allow sufficient parking for patients, client, visitors, employees, and medical staff; site work; and landscaping. Therefore, Tier I of the proposed project would not result in impacts with regard to parking capacity.

Tier II

Tier II would be anticipated to provide sufficient parking for the anticipated mixed-use development. This is a County identified objective for Tier II of the proposed project and as such Tier II of the proposed project would not result in impacts with regard to parking capacity.

Alternative Transportation

Tier I

Tier I of the proposed project would not be expected to result in impacts to transportation and traffic in relation to conflict with adopted policies, plans, or programs regarding alternative modes of transportation. The proposed project would not involve construction- or operation-related traffic activities that would be expected to significantly interfere with regular operation of the established alternative transportation plans or policies. Moreover, the proposed project site is connected by a network of well-defined, pre-existing, and traffic-controlled paved roads. These roads include 120th Street to the north and Wilmington Avenue to the east, traversing through and around the proposed project site. These paved roads incorporate ample design and planning to allow for alternative transportation methods, such as bicycles and buses, to share access to the existing site with automobile vehicles. As noted above, there is an existing public transportation network surrounding the proposed project site that would continue to function after completion of the proposed project. It is anticipated that the proposed project would be designed to support alternative modes of transportation by incorporating project elements such as pedestrian-friendly site passages and campus access. Furthermore, the County would continue to support and enhance the use of existing alternative transportation modes. The proposed project would be consistent with the County's goals and policies to improve the efficiency of the transportation system, and to reduce transportation energy consumption and transportation-related degradation of the environment.

There are a total of approximately 66 to 82 buses during the peak hours that serve the study area, as well as 40 trains (Metro Green Line and Blue Line) that operate during the peak hours. There would be residual capacity available on a daily basis, both on the existing bus and train lines, serving the study area. Further, the existing residual transit system supply would accommodate the proposed project's anticipated transit demands.

It is anticipated that Tier I of the proposed project would generate a net total reduction of approximately -5,771 daily trips of which -391 trip ends occur during the morning peak hour and - 398 trip ends occur during the evening peak hour, prior to any transit and internal trip adjustments.

Therefore, Tier I of the proposed project would not result in significant impacts to transportation and traffic related to a conflict with adopted policies, plans, or programs regarding public transit.

Tier II

Tier II of the proposed project would not be expected to result in impacts to transportation and traffic in relation to conflict with adopted policies, plans, or programs regarding alternative modes of transportation. The proposed project would not involve construction- or operation-related traffic activities that would be expected to significantly interfere with regular operation of the established alternative transportation plans or policies. Moreover, the proposed project site is connected by a network of well-defined, pre-existing, and traffic-controlled paved roads. These roads include 120th Street to the north and Wilmington Avenue to the east, traversing through and around the proposed project site. These paved roads incorporate ample design and planning to allow for alternative transportation methods, such as bicycles and buses, to share access to the existing site with automobile vehicles. As noted above, there is an existing public transportation network surrounding the proposed project site that would continue to function after completion of the proposed project. It is anticipated that the proposed project would be designed to support alternative modes of transportation by incorporating project elements such as pedestrian-friendly site passages and campus access. Furthermore, the County would continue to support and enhance the use of existing alternative transportation modes. The proposed project would be consistent with the County's goals and policies to improve the efficiency of the transportation system, and to reduce transportation energy consumption and transportation-related degradation of the environment. Therefore, Tier II of the proposed project would not result in significant impacts to transportation and traffic related to a conflict with adopted policies, plans, or programs regarding public transit.

The transit trips expected to be generated by the proposed project was estimated based on the number of vehicle trips, per the guidelines outlines in the CMP document. These estimates assume an Average Vehicle Occupancy (AVO) of 1.40 and a maximum of 15% reduction in auto trips resulting in 15% of the total person trips using transit. This analysis assumes a conservative worst-case usage of 15% transit. Tier I of the proposed project would generate a net total reduction of approximately -1,212 daily person transit trips including -82 morning peak hour transit trips and -84 evening peak hour transit trips.

Under cumulative project conditions, the Tier II of the proposed project would generate approximately 6,831 daily person transit trips including 429 morning peak hour transit trips and 595 evening peak hour transit trips.

There are a total of approximately 66 to 82 buses during the peak hours that serve the study area, as well as 40 trains (Metro Green Line and Blue Line) that operate during the peak hours. There would be residual capacity available on a daily basis, both on the existing bus and train lines, serving the study area. Further, the existing residual transit system supply would accommodate the proposed project's anticipated transit demands.

Cumulative Impacts

The area surrounding the proposed project site was examined in order to determine whether there are currently any projects in progress or proposed for the future that could potentially add to the impacts of the proposed project, creating cumulative significant impacts.

It was determined that there are at least forty-two (42) projects (excluding the Martin Luther King, Jr. Medical Center Campus improvements) that could affect the cumulative impacts analysis of the proposed project that are anticipated to be implemented within construction period for both tiers of the proposed project occurring within an approximate 2.5- to 3-mile radius of the proposed project site.[45]

A forecast of on-street traffic conditions prior to the occupancy of the proposed project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area. The trip generation estimates for the related projects were developed using trip generation rates contained in the Institute of Transportation Engineers (ITE), *Trip Generation Informational Report*, 8th Edition. The related projects are anticipated to generate approximately 2,827 trips during the morning peak hour and 2,191 trips during the evening peak hour.

Cumulatively, the proposed project (both Tier I and Tier II) generates a net total of approximately 32,527 daily trips of which 2,044 trip ends occur during the morning peak hour and 2,834 trip ends occur during the evening peak hour, prior to any reductions due to transit and internal trips.

Tier I Cumulative Impacts

Under Tier I of the proposed project, trip generation would be reduced over current conditions, as existing campus buildings are vacated, and therefore neither the intersections nor the highway segments located within the County or in the non-County operated jurisdictions would be adversely impacted by completion of the proposed project elements[46]. Further, none of the analyzed intersections would be significantly impacted by the effects of proposed Tier I project components and related projects. As such, Tier I would not cause a significant traffic impact at any of the analyzed intersections or highway segments. Tier I would result in a reduced number of trips on the freeways and surrounding streets. Therefore, no mitigation measures would be required under cumulative conditions.

Tier II Cumulative Impacts

Tier II of the proposed project would cause a significant cumulative traffic impact at 13 of the 27 analyzed County of Los Angeles intersections (ten in the AM peak hour and twelve in the PM peak hour) following completion of Tier II components, in the year 2020 (Table 3.12.4-6, *Cumulative LOS Summary with Ambient Growth, Related Projects, Tier I, and Tier II*).

[45] For the purposes of the traffic analysis prepared for the proposed project, the ongoing campus improvements were evaluated as an existing condition of the campus rather than a related project. Additionally, the distances of the related projects to the campus were assessed at the intersections/streets, as a result, the distances of the related projects all appear within an approximately 2.5-mile radius.

[46] Under the Existing (Baseline) with Ambient Growth (2014) plus Tier I Project (or Cumulative (2014) plus Tier I Project) conditions.

3.12.4-6
CUMULATIVE LOS SUMMARY WITH AMBIENT GROWTH, RELATED PROJECTS, TIER I, AND TIER II

#	Intersection	Existing Baseline with Ambient Growth				Existing Baseline with Ambient Growth and Tier I Project			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS
County of Los Angeles									
52	Alameda Street/103rd Street [1]	0.783	C	0.850	D	0.781	C	0.847	D
55	Alameda Street/El Segundo Boulevard [2]	0.638	B	0.753	C	0.635	B	0.752	C
54	Alameda Street/Imperial Highway [1]*	0.757	C	0.842	D	0.754	C	0.841	D
11	Avalon Boulevard/El Segundo Boulevard	0.621	B	0.762	C	0.619	B	0.760	C
12	Avalon Boulevard/Rosecrans Avenue	0.612	B	0.727	C	0.611	B	0.726	C
4	Broadway/El Segundo Boulevard	0.501	A	0.552	A	0.500	A	0.550	A
19	Central Avenue/El Segundo Boulevard [2]	0.775	C	0.848	D	0.771	C	0.845	D
20	*Central Avenue/Rosecrans Avenue [2]*	*0.793*	*C*	*0.922*	*E*	*0.792*	*C*	*0.919*	*E*
26	Compton Avenue/118th Street	0.378	A	0.326	A	0.376	A	0.323	A
27	Compton Avenue/120th Street	0.591	A	0.512	A	0.576	A	0.492	A
28	Compton Avenue/124th Street	0.319	A	0.267	A	0.317	A	0.265	A
25	Compton Avenue/Imperial Highway [3]**	0.826	D	0.702	C	0.820	D	0.697	B
49	I-105 Westbound Ramps/Imperial Highway [3,4]**	0.749	C	0.728	C	0.737	C	0.720	C
5	Main Street/El Segundo Boulevard	0.542	A	0.606	B	0.541	A	0.604	B
51	Mona Boulevard/El Segundo Boulevard	0.556	A	0.579	A	0.554	A	0.577	A
50	Mona Boulevard/Imperial Highway [1,3]**	0.645	B	0.705	C	0.642	B	0.703	C
7	San Pedro Street/El Segundo Boulevard	0.537	A	0.542	A	0.536	A	0.541	A
23	Success Avenue - Slater Avenue/120th Street	0.437	A	0.359	A	0.426	A	0.345	A
46	Willowbrook Avenue/119th Street	0.502	A	0.677	B	0.496	A	0.674	B
47	Willowbrook Avenue/El Segundo Boulevard	0.548	A	0.618	B	0.545	A	0.616	B
35	Wilmington Avenue/118th Street	0.722	C	0.710	C	0.700	B	0.695	B
36	Wilmington Avenue/120th Street-119th Street	0.773	C	0.764	C	0.741	C	0.736	C
38	Wilmington Avenue/124th Street	0.561	A	0.519	A	0.543	A	0.503	A
34	Wilmington Avenue/I-105 Eastbound Ramps [4]	0.786	C	0.804	D	0.757	C	0.772	C

TABLE 3.12.4-6
CUMULATIVE LOS SUMMARY WITH AMBIENT GROWTH, RELATED PROJECTS, TIER I, AND TIER II, Continued

#	Intersection	Existing Baseline with Ambient Growth				Existing Baseline with Ambient Growth and Tier I Project			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS
County of Los Angeles									
37	Wilmington Avenue/MLK Hospital Driveway – 120th Street	0.573	A	0.571	A	0.512	A	0.516	A
39	Wilmington Avenue/El Segundo Boulevard [2]	0.791	C	0.849	D	0.784	C	0.839	D
33	Wilmington Avenue/Imperial Highway-Willowbrook Avenue [3]**	0.471	A	0.487	A	0.454	A	0.473	A

SOURCE: Raju Associates, Inc., 2010.
KEY:
* Los Angeles County Congestion Management Program (CMP) monitoring location.
** City of Los Angeles ATSAC/ATCS location. V/C ratio includes ATSAC/ATCS reduction of 0.10.
[1] Shares jurisdiction with City of Lynwood.
[2] Shares jurisdiction with City of Compton.
[3] Shares jurisdiction with City of Los Angeles.
[4] Shares jurisdiction with Caltrans.

At the County of Los Angeles locations, the Tier II of the proposed project in the buildout year 2020 would cause a significant cumulative traffic impact at 13 of the 27 analyzed intersections (10 in the AM peak hour and 12 in the PM peak hour).[47] The impacted intersections include the following[48]:

- Alameda Street/103rd Street – AM and PM Peak Hours
- Alameda Street/El Segundo Boulevard – PM Peak Hour
- Alameda Street/Imperial Highway – AM and PM Peak Hours
- Avalon Boulevard/El Segundo Boulevard – PM Peak Hour
- Central Avenue/El Segundo Boulevard – AM and PM Peak Hours
- Central Avenue/Rosecrans Avenue – PM Peak Hour
- Compton Avenue/Imperial Highway – AM Peak Hour
- I-105 Westbound Ramps/Imperial Highway – AM and PM Peak Hours.
- Wilmington Avenue/118th Street – AM and PM Peak Hours
- Wilmington Avenue/120th Street-119th Street – AM and PM Peak Hours
- Wilmington Avenue/I-105 Eastbound Ramps – AM and PM Peak Hours
- Wilmington Avenue/MLK Jr. Hospital Dwy-120th Street – AM and PM Peak Hours
- Wilmington Avenue/El Segundo Boulevard – AM and PM Peak Hours

[47] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King Jr. Medical Campus*. Pasadena, CA.

[48] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King Jr. Medical Campus*. Pasadena, CA.

Therefore, Tier II of the proposed project would result in significant cumulative traffic impacts that would require the incorporation of mitigation measures to reduce these impacts below the level of significance.

Non-County Jurisdictions

Tier I

Using the specified significant impact criteria, Tier I of the proposed project would not result in significant impacts on the freeways and surrounding streets. Additionally, Tier I would not result in significant impacts to the transit system. Therefore, Tier I cumulative impacts would be less than significant.

Tier II

Using the specified significant impact criteria, Tier II of the proposed project would be expected to result in the traffic impacts at the 37 analysis locations in the Cities of Los Angeles, Compton, and Lynwood were determined for Tier II proposed project conditions. The Tier II proposed project resulted in significant impacts at 1 of the 37 analyzed intersections. The intersection of Central Avenue/120th Street would be significantly impacted by the proposed project in the AM and PM peak hours.[49]

Tier II impacts would not result in significant impact to the transit system. However, Tier II would be expected to result in cumulative impacts when combined with the related projects such as the Jordan Downs Redevelopment Project. Therefore, cumulative impacts would be significant and mitigation measures would be required to reduce these impacts below the level of significance.

3.12.5 Mitigation Measures

Tier I

Measure Traffic-1

To reduce the traffic-related construction impacts, the County of Los Angeles shall require the construction contractor to provide a Construction Traffic Management Plan that is prepared in accordance with the California Department of Transportation's Construction Manual and Manual on Uniform Traffic Control Devices. The Construction Traffic Management Plan shall at the minimum address:

- Timing of deliveries of heavy equipment and building materials;
- Directing construction traffic with a flag person;
- Placing temporary signing, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic;
- Identifying if improvements to the intersection of 120th Street, Wilmington Avenue, or Compton Avenue are necessary to accommodate the turning radii needed by large trucks accessing site;
- Identifying multiple alternate ingress/egress access point for the circulation of traffic and emergency response vehicles;

[49] Raju Associates, Inc. July 2010. *Draft Traffic Study for the Martin Luther King Jr. Medical Campus*. Pasadena, CA.

- Determining the need for construction work hours and arrival/departure times outside peak traffic periods;
- Ensuring access for emergency vehicles to the project site;
- Temporary closure of travel lanes or disruptions to street segments and intersections during materials delivery, transmission line stringing activities, or any other utility connections;
- Maintaining access to adjacent property;
- Specification of both construction-related vehicle travel and oversize load haul routes, the minimization of construction traffic during the AM and PM peak hour, distributing construction traffic flow across alternative routes to access the proposed project site, and avoiding residential neighborhoods to the maximum extent feasible; and
- Identification of vehicle safety procedures for entering and exiting site access roads.

Tier II

Measure Traffic-1

To reduce the traffic-related construction impacts, the County of Los Angeles shall require the construction contractor to provide a Construction Traffic Management Plan that is prepared in accordance with the California Department of Transportation's Construction Manual and Manual on Uniform Traffic Control Devices. The Construction Traffic Management Plan shall at the minimum address:

- Timing of deliveries of heavy equipment and building materials;
- Directing construction traffic with a flag person;
- Placing temporary signing, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic;
- Identifying if improvements to the intersection of 120th Street, Wilmington Avenue, or Compton Avenue are necessary to accommodate the turning radii needed by large trucks accessing site;
- Identifying multiple alternate ingress/egress access point for the circulation of traffic and emergency response vehicles;
- Determining the need for construction work hours and arrival/departure times outside peak traffic periods;
- Ensuring access for emergency vehicles to the project site;
- Temporary closure of travel lanes or disruptions to street segments and intersections during materials delivery, transmission line stringing activities, or any other utility connections;
- Maintaining access to adjacent property;
- Specification of both construction-related vehicle travel and oversize load haul routes, the minimization of construction traffic during the AM and PM peak hour, distributing construction traffic flow across alternative routes to access the proposed project site, and avoiding residential neighborhoods to the maximum extent feasible; and
- Identification of vehicle safety procedures for entering and exiting site access roads.

Measure Traffic-2

In order to address the Tier II project impacts, the County of Los Angeles shall complete the following improvements:

- Compton Avenue/Imperial Highway – County of Los Angeles / City of Los Angeles: Re-stripe westbound approach to provide a separate right-turn lane.

- I-105 / Imperial Highway: Provide a third northbound, left-turn lane by widening off-ramp by 10 feet for approximately 150 to 200 feet.

- Wilmington Avenue / El Segundo Boulevard: Re-stripe eastbound and westbound approaches to have separate right-turn lanes. Allow buses to go through the intersection from the right-turn lanes.

- Central Avenue / 120th Street: Re-stripe northbound approach to provide a separate right-turn lane. Also, widen the east leg by 3 feet on each curbside (i.e., reduce sidewalk along 120th Street east of Central Avenue by 3 feet for approximately 120 feet and re-stripe westbound 120th Street approach to provide a left-turn, two through lanes and a separate right-turn lane.

- Wilmington Avenue / I-105 Eastbound Ramps – County of Los Angeles / California Department of Transportation: Provide an additional eastbound lane by widening (reducing the raised median on the ramp) the off-ramp. The eastbound approach would have a left-turn lane, shared left-right turn lane, and a separate right-turn lane. The sidewalks on either side of Wilmington Avenue (as noted above) would be reduced by 2 feet and the Wilmington Avenue roadway would be widened by 2 feet on either side (a total of 4 feet) from the south leg of this intersection. Provide an additional northbound left-turn lane by widening (reducing the medians). The northbound approach would have dual left-turn lanes and three through lanes.

- Wilmington Avenue/118th Street – County of Los Angeles: Widen Wilmington Avenue roadway by 2 feet on either side and re-stripe to provide two through lanes, a shared through right-turn lane and dual left-turn lanes along the southbound approach. Re-stripe the westbound approach to provide a separate right-turn land and a share left-through lane. Northbound approach would have the same lane geometry as existing conditions. Under cumulative conditions, widen 118th Street roadway by 4 feet and re-stripe to provide a separate right-turn lane and shared left-through lane along the eastbound approach.

- Wilmington Avenue / 120th Street-119th Street – County of Los Angeles: Widen Wilmington Avenue roadway by 2 feet on either side and re-stripe the southbound approach to provide a separate right-turn lane, three through lanes, and a left-turn lane.

Re-stripe northbound approach to provide a shared through-right turn lane, two through lanes, and a left-turn lane. Remove median adjacent to northbound approach to facilitate three southbound receiving lanes. Restrict parking along Wilmington Avenue roadway during morning and evening peak periods along the eastside of Wilmington between 120th Street and Martin Luther King, Jr. Hospital Driveway entrance.

Widen 120th Street west of Wilmington Avenue for 250 feet, on the south side by 2 feet, and re-stripe the eastbound approach to provide a separate right-turn lane, dual left-turn lanes, and a through lane. The westbound approach of 119th Street would have the same lane geometry as existing conditions.

- Wilmington Avenue / Martin Luther King, Jr. Hospital Entrance-120th Street – County of Los Angeles: Re-stripe southbound approach to provide a separate right-turn lane, two through lanes, and a left-turn lane. Provide three northbound receiving lanes and restrict on-street curb parking along the eastside of Wilmington Avenue between Martin Luther King, Jr. Hospital Driveway and 120th Street and 120th Street and 119th Street during morning and evening peak hours.

  Remove the median within the hospital entrance and re-stripe the driveway to provide dual left-turn lanes, a through lane, and a separate right-turn lane along the eastbound approach. Re-stripe to provide one receiving lane.

The appropriate conceptual signing and striping plans shall be submitted to the County of Los Angeles Department of Public Works, Traffic and Lighting Division for review and approval during the planning phase.

Measure Traffic-3

In order to address the Tier II cumulative projects impacts, using County of Los Angeles traffic study guidelines, the following mitigation measures shall be implemented to alleviate the cumulative significant impacts:

- Avalon Boulevard/El Segundo Boulevard – County of Los Angeles: Widen northbound approach by 2 feet and re-stripe the approach to provide a left turn lane, two through lanes, and a separate right-turn lane (10 feet, 10 feet, 10 feet, 12 feet). The approach could be widened by narrowing the 5-foot-wide median to a 3-foot-wide median, or by reducing the 12-foot-wide sidewalk to a 10-foot-wide sidewalk. This widening would need to occur all the way to an alley located approximately 100 feet south of the intersection. The bus stop at this approach would continue to be located at the same location; however, buses would be allowed to go straight through the intersection.

- Alameda Street/El Segundo Boulevard – County of Los Angeles/Compton: Re-stripe northbound/southbound approaches and provide a southbound right-turn lane. The lanes along the north leg would be re-striped to provide 13-foot and 11-foot receiving lanes; 10-foot, 11-foot, 10-foot, and 12-foot approach lanes for southbound right, both southbound turns, and southbound right lanes, respectively. The lanes along the south leg would have a 13-foot shared right through-way, 11-foot through lane, 10-foot left-turn lane, 12-foot receiving lane, and a 20-foot receiving lane. Remove two on-street parking spaces along the southbound approach during peak hours.

- Alameda Street/103rd Street – County of Los Angeles/Lynwood: Re-stripe eastbound approach to provide a 10-foot, left-turn lane and a 12-foot, left-right shared lane. The receiving lane would be re-striped for 18.5 feet.[50]

- Central Avenue/Rosecrans Avenue – County of Los Angeles/Compton: Re-stripe westbound approach to provide a separate right-turn lane. Allow buses to go through the intersection from the right-turn lane.

- Central Avenue/El Segundo Boulevard – County of Los Angeles/Compton: Re-stripe southbound approach to provide a separate right-turn lane. Widen northbound approach by reducing median by 1 foot to 2 foot. Provide re-striping to show a separate northbound right-turn lane. Allow buses to go through the intersection from the right-turn lane.

- Alameda Street/Imperial Highway – County of Los Angeles/City of Lynwood: Re-stripe southbound approach to provide the following roadway geometry: dual left-turn lanes, a through lane, a shared through-right turn lane, and a separate right-turn lane.

The appropriate conceptual signing and striping plans shall be submitted to the County of Los Angeles Department of Public Works, Traffic and Lighting Division for review and approval during the planning phase.

3.12.6 Level of Significance after Mitigation

Tier I

Implementation of mitigation measure Traffic-1 would reduce impacts generated during the construction of Tier I. Therefore, impacts from Tier I would be less than significant.

Tier II

Implementation of the mitigation measures Traffic-1, Traffic-2, and Traffic-3 would reduce construction-related Tier II and construction and operational Tier II project impacts and cumulative project impacts to below the level of significance.

As indicated in the Table 3.12.6-1, *Traffic Impact Analysis – Future 2020 Cumulative Conditions Los Angeles County Locations*, the recommended improvements would fully mitigate the cumulative projects related impacts at all the impacted intersections.

If for some reason these improvements can not be implemented as described in the mitigation measures above, the significant traffic and transportation impacts for Tier I and Tier II would remain.

TABLE 3.12.6-1
FUTURE 2020 CUMULATIVE CONDITIONS FOR
LOS ANGELES COUNTY LOCATIONS

#	Intersection	Peak Hour	Existing (Baseline) + Ambient (2020)		Existing (Baseline) + Ambient (2020) with Tier I & II Project and Related Projects		Project Increase in V/C	Significant Impact	Existing (Baseline) + Ambient (2020) with Tier I & II Project and Related Projects and Mitigation		Project Increase in V/C	Significant Impact
			V/C	LOS	V/C	LOS			V/C	LOS		
52	Alameda Street/103rd Street [1]	AM	0.812	D	0.864	D	0.052	**Yes**	0.752	C	-0.060	No
		PM	0.880	D	0.950	E	0.070	**Yes**	0.834	D	-0.046	No
55	Alameda Street/El Segundo Boulevard [2]	AM	0.661	B	0.703	C	0.042	No	0.666	B	0.005	No
		PM	0.781	C	0.820	D	0.039	**Yes**	0.778	C	-0.003	No
54	Alameda Street/Imperial Highway [1]*	AM	0.785	C	0.825	D	0.040	**Yes**	0.792	C	0.007	No
		PM	0.872	D	0.935	E	0.063	**Yes**	0.871	D	-0.001	No
11	Avalon Boulevard/El Segundo Boulevard	AM	0.642	B	0.682	B	0.040	No	0.682	B	0.040	No
		PM	0.788	C	0.814	D	0.026	**Yes**	0.765	C	-0.023	No
12	Avalon Boulevard/Rosecrans Avenue	AM	0.634	B	0.649	B	0.015	No				
		PM	0.753	C	0.771	C	0.018	No				
4	Broadway/El Segundo Boulevard	AM	0.520	A	0.530	A	0.010	No				
		PM	0.569	A	0.581	A	0.012	No				
19	Central Avenue/El Segundo Boulevard [2]	AM	0.803	D	0.837	D	0.034	**Yes**	0.772	C	-0.031	No
		PM	0.879	D	0.902	E	0.023	**Yes**	0.838	D	-0.041	No
20	Central Avenue/Rosecrans Avenue [2]	AM	0.824	D	0.838	D	0.014	No	0.790	C	-0.034	No
		PM	0.956	E	0.975	E	0.019	**Yes**	0.953	E	-0.003	No
26	Compton Avenue/118th Street	AM	0.391	A	0.419	A	0.028	No				
		PM	0.336	A	0.382	A	0.046	No				
27	Compton Avenue/120th Street	AM	0.610	B	0.690	B	0.080	No				
		PM	0.527	A	0.676	B	0.149	No				
28	Compton Avenue/124th Street	AM	0.330	A	0.343	A	0.013	No				
		PM	0.274	A	0.290	A	0.016	No				
25	Compton Avenue/Imperial Highway [3]**	AM	0.860	D	0.905	E	0.045	**Yes**	0.836	D	-0.024	No
		PM	0.731	C	0.769	C	0.038	No	0.759	C	0.028	No
49	I-105 Westbound Ramps/Imperial Highway [3,4]**	AM	0.779	C	0.857	D	0.078	**Yes**	0.765	C	-0.014	No
		PM	0.759	C	0.815	D	0.056	**Yes**	0.725	C	-0.034	No
5	Main Street/El Segundo Boulevard	AM	0.561	A	0.571	A	0.010	No				
		PM	0.628	B	0.640	B	0.012	No				
51	Mona Boulevard/El Segundo Boulevard	AM	0.574	A	0.593	A	0.019	No				
		PM	0.599	A	0.616	B	0.017	No				
50	Mona Boulevard/Imperial Highway [1,3]**	AM	0.673	B	0.697	B	0.024	No				
		PM	0.734	C	0.763	C	0.029	No				
7	San Pedro Street/El Segundo Boulevard	AM	0.554	A	0.566	A	0.012	No				
		PM	0.563	A	0.575	A	0.012	No				
23	Success Avenue - Slater Avenue/120th Street	AM	0.452	A	0.495	A	0.043	No				
		PM	0.367	A	0.447	A	0.080	No				
46	Willowbrook Avenue/119th Street	AM	0.519	A	0.575	A	0.056	No				
		PM	0.699	B	0.739	C	0.029	No				
47	Willowbrook Avenue/El Segundo Boulevard	AM	0.567	A	0.595	A	0.028	No				
		PM	0.641	B	0.664	B	0.023	No				

TABLE 3.12.6-1
FUTURE 2020 CUMULATIVE CONDITIONS FOR
LOS ANGELES COUNTY LOCATIONS, Continued

#	Intersection	Peak Hour	Existing (Baseline) + Ambient (2020)		Existing (Baseline) + Ambient (2020) with Tier I & II Project and Related Projects		Project Increase in V/C	Significant Impact	Existing (Baseline) + Ambient (2020) with Tier I & II Project and Related Projects and Mitigation		Project Increase in V/C	Significant Impact
			V/C	LOS	V/C	LOS			V/C	LOS		
35	Wilmington Avenue/118th Street	AM	0.746	C	0.895	D	0.149	**Yes**	0.637	B	-0.109	No
		PM	0.735	C	0.870	D	0.135	**Yes**	0.754	C	0.019	No
36	Wilmington Avenue/120th Street-119th Street	AM	0.800	C	0.948	E	0.148	**Yes**	0.700	B	-0.100	No
		PM	0.792	C	0.998	E	0.206	**Yes**	0.749	C	-0.043	No
38	Wilmington Avenue/124th Street	AM	0.581	A	0.674	B	0.093	No				
		PM	0.533	A	0.619	B	0.086	No				
34	Wilmington Avenue/I-105 Eastbound Ramps [4]	AM	0.812	D	0.962	E	0.150	**Yes**	0.797	C	-0.015	No
		PM	0.830	D	1.052	F	0.222	**Yes**	0.765	C	-0.065	No
37	Wilmington Avenue/MLK Hospital Driveway – 120th Street	AM	0.585	A	0.843	D	0.258	**Yes**	0.686	B	0.101	No
		PM	0.583	A	0.934	E	0.351	**Yes**	0.742	C	0.032	No
39	Wilmington Avenue/El Segundo Boulevard [2]	AM	0.819	D	0.858	D	0.039	**Yes**	0.808	D	-0.011	No
		PM	0.879	D	0.949	E	0.070	**Yes**	0.862	D	-0.017	No
33	Wilmington Avenue/Imperial Highway-Willowbrook Ave [3]**	AM	0.492	A	0.599	A	0.107	No				
		PM	0.506	A	0.606	B	0.100	No				

KEY:
* Los Angeles County Congestion Management Program (CMP) monitoring location.
[1] Shares jurisdiction with City of Lynwood.
[2] Shares jurisdiction with City of Compton.
[3] Shares jurisdiction with City of Los Angeles.
[4] Shares jurisdiction with Caltrans.

3.13 UTILITIES AND SERVICE SYSTEMS

As a result of the Initial Study,[1] the County of Los Angeles (County) determined that the Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would have the potential to result in impacts from utilities and service systems. Therefore, this issue has been carried forward for detailed analysis in this Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts to utilities and service systems. This analysis considers impacts that may result from all phases of the proposed project in relation to utilities and service systems, including construction activities and operation.

The analysis of utilities and service systems consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the proposed project area, thresholds for determining if the proposed project would result in significant impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential for impacts to utilities and service systems has been analyzed in accordance with the methodologies and information provided by the County General Plan.[2] This section therefore describes current capacities, as appropriate, for construction and operation of the project. Utilities and service systems for the proposed project are assessed in terms of location of the services, existing and projected service ratios, and other service objectives as applicable. Cumulative impacts are determined with consideration of projected development in the area. Where impacts on services are determined to be potentially significant, mitigation measures are recommended to ensure adequate delivery of utilities to the project.

3.13.1 Regulatory Framework

State

California Administrative Code/California Urban Water Management Act

Title 24 of the California Administrative Code includes the California Building Standards, which in turn includes the California Plumbing Code (Part 5), which promotes water conservation. Title 20 of the California Administrative Code addresses public utilities and energy and includes appliance and efficiency standards that promote water conservation. In addition, a number of state laws require water-efficient plumbing fixtures in structures.

Section 10610 of the California Water Code established the California Urban Water Management Planning Act (CUWMPA). CUWMPA requires urban water suppliers to initiate planning strategies that make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its customers during normal, dry, and multiple dry-water years.[3] Specifically, the CUWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that provides more than 3,000 acre-feet[4] of water service annually, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of

[1] County of Los Angeles. 8 March 2010. *Martin Luther King, Jr. Medical Center Campus Redevelopment Project Initial Study*. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

[2] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

[3] California Water Code. Section 10610 et. seq.: "Urban Water Management Planning Act." Available at: http://www.leginfo.ca.gov/calaw.htm

[4] An acre-foot of water is approximately 326,000 gallons.

customers during normal, dry, and multiple-dry years. The CUWMPA describes the contents of Urban Water Management Plans, as well as methods for urban water suppliers to adopt and implement the plans. Under the CUWMPA, the proposed project would be subject to the County Stormwater Ordinance.[5]

Senate Bill 221 and 610

Senate Bill (SB) 221 requires that a jurisdiction approving certain subdivisions must obtain written verification of a sufficient water supply from the applicable public water agency. Sufficient water supply is defined as the total water supply available during normal, single-dry, and multiple-dry years within a 20-year projection that will meet the projected demand associated with a proposed project. SB 221 applies to subdivisions of more than 500 units, or those that are served by small water agencies that increase service by at least 10 percent. SB 221's requirements for documenting sufficient water supply parallel SB 610's requirements for a water supply assessment, described below.

SB 610 requires that for residential, commercial, or industrial projects meeting certain size requirements, lead agencies must either request a Water Supply Assessment from the applicable water supply agency, or, if no water supply agency exists, prepare the assessment. The water supply assessment shall be prepared within 90 days of a request, and must show how total projected water supplies would meet the proposed project's water demands in normal and dry years.

SB 610 applies to all project types, and is triggered by State California Environmental Quality Act (CEQA) Guidelines Section 15083.5 early in the planning process. SB 221 applies only to certain residential subdivisions, occurs immediately prior to final subdivision map approval, and is meant as a back-up to the Water Supply Assessment performed pursuant to SB 610. The written verification of water supply provided by SB 221 helps to ensure that adequate water is available for each development rather than a more general assessment of water supply to a jurisdiction.

California Solid Waste Reuse and Recycling Access Act

The California Solid Waste Reuse and Recycling Access Act of 1991 required each jurisdiction to adopt a solid waste reuse and recycling ordinance by September 1, 1994. This act requires each "development project" to provide an adequate storage area for collection and removal of recyclable materials. Development and operation of the proposed project would be subject to the requirements of this act.

Local

County of Los Angeles General Plan

The Water and Waste Management element of the County General Plan describes existing systems in the County that provide water supply and distribution, flood protection, water conservation, sewerage, water reclamation, and solid waste disposal.[6] This document sets forth the County policy on these systems by identifying a series of 4 broad objectives and 25 supporting policies. There are 5 goals presented in the Water and Waste Management element that are relevant to new development:

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[5] County of Los Angeles Department of Public Works. 2002. *County of Los Angeles Department of Water and Power Urban Water Management Plan, Fiscal Year 2001-2002 Annual Update*. Los Angeles, CA.

[6] County of Los Angeles Department of Regional Planning. January 1993. *County of Los Angeles Streamlined General Plan, Public Facilities Element*. Los Angeles, CA.

Goal 1: To mitigate hazards and avoid adverse impacts in providing water and waste services and to protect the health and safety of all residents.

Goal 2: Protection of the health, safety, and welfare of all residents in providing water and waste services

Goal 3: To develop improved systems of resource use, recovery, and reuse.

Goal 4: To provide efficient water and waste management services.

Goal 5: To maintain the high quality of our coastal, surface, and ground waters.

Policies in support of these goals include improving coordination among operating agencies of all water and waste management systems, promoting the advancement of technology to reduce the volume of liquid waste, and facilitating the recycling of wastes, such as metal, glass, paper, and textiles.

Los Angeles County Hydrology Manual

The County of Los Angeles Hydrology Manual provides information relevant to conducting hydrologic study within the County of Los Angeles.[7] This manual provides examples and methods to explain the steps involved in converting rainfall to runoff flow rates and volumes using Public Works' standards. In addition, this manual contains procedures and standards developed and revised by the Water Resources Division of the County Department of Public Works based on historic rainfall and runoff data collected within the County.[8] The techniques in this manual apply to the design of local storm drains, retention and detention basins, pump stations, and major channel projects. The techniques also apply to storm drain deficiency and flood hazard evaluations. Low flow hydrology methods related to water quality standards are also discussed.[9]

Los Angeles County Integrated Waste Management Plan

The California Integrated Waste Management Act of 1989 (AB 939) requires that the responsibility for solid waste management be shared between state and local governments. The State of California has directed the County to prepare and implement a local integrated waste management plan in accordance with AB 939. The Los Angeles County Integrated Waste Management Plan Executive Summary presents the Countywide goals and objectives for integrated solid waste management and describes the County's system of governmental solid waste management infrastructure and the current

[7] County of Los Angeles, Department of Public Works. January 2006. *County of Los Angeles Hydrology Manual*. Accessed at: http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf

[8] County of Los Angeles, Department of Public Works. January 2006. *County of Los Angeles Hydrology Manual*. Accessed at: http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf

[9] County of Los Angeles, Department of Public Works. January 2006. *County of Los Angeles Hydrology Manual*. Accessed at: http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf

system of solid waste management in the cities and unincorporated areas of the County. This document also summarizes the types of programs planned for individual jurisdictions and describes countywide programs that could be consolidated.[10]

The Los Angeles County Integrated Waste Management Plan, 2000 Annual Report on the Countywide Summary Plan and Countywide Siting Element, describes the County's approach to dealing with a broad range of solid waste issues, including processing capacity; markets for recovered materials; waste reduction mandates; waste disposed at Class I (i.e., hazardous waste–only landfills) and Class II (i.e., landfills that accept specified hazardous waste and non-hazardous wastes) disposal facilities; allocation of "orphan" waste (waste that comes from an unknown origin); the accuracy of the State Disposal Reporting System (DRS); and the California Integrated Waste Management Board (CIWMB) enforcement policy. This document also includes the Los Angeles County Integrated Waste Management task force recommendations that can be implemented at the state and local levels to improve the current waste management system. The task force's recommendations focus on improving the quality of programs, rather than relying on quantity measurements in complying with the state's waste reduction mandates.[11] The proposed project would be subject to the Los Angeles County Integrated Waste Management Plan.

3.13.2 Existing Conditions

The existing campus is connected to the public utilities, water, gas, and sewer through a system of underground piping, valves, and access points to all the buildings. This complex piping system is used to maintain the connectivity from the buildings to the utilities in the streets.[12] Existing utilities for the campus are provided through the following equipment and structures: underground utility tunnel, cooling towers, electrical equipment, bulk oxygen (O_2) storage, gas cylinders, generator fuel storage, central plant, underground fuel tanks, and emergency generators.

Wastewater Treatment

The proposed project lies within the Sanitation Districts of Los Angeles County (Districts). Wastewater generated within project area is discharged to local sewer lines for conveyance to the Districts trunk sewer network. The Sanitation Districts consists of 24 independent special districts that serve approximately 5.7 million people in Los Angeles County.[13] Approximately 1,400 miles of main trunk sewer and 11 wastewater treatment plants treat about half the wastewater within the County.

The Industrial Waste (IW) Unit of the County of Los Angeles Department of Public Works (LACDPW), Environmental Programs Division (EPD) permits and inspects industrial waste discharges into over 3,000 miles of local sewers within the unincorporated areas of Los Angeles County and 37 contract cities. The IW Unit also regulates industrial wastewater collected and hauled to a legal point of disposal or discharged into the ground (where permissible). The LACDPW Sewer Maintenance Division is responsible for two County Sewer Maintenance Districts, which operate local sanitary sewer systems serving a population of 2.5 million people within the County's unincorporated area and

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[10] County of Los Angeles Department of Public Works. 1997. *Los Angeles County Integrated Waste Management Summary Plan, Executive Summary*. Alhambra, CA.

[11] County of Los Angeles Department of Public Works. 2001. *Los Angeles County Integrated Waste Management Plan, 2000 Annual Report on the Countywide Summary Plan and Countywide Siting Element*. Alhambra, CA.

[12] HMC Architects. 18 September 2009. *Martin Luther King, Jr. Medical Center Campus—Campus Planning and Programming Report*. Los Angeles, CA.

[13] Los Angeles County Sanitation Districts. Web site. Accessed 19 April 2010. Available at: www.lacsd.org/about

its incorporated cities. The system consists of 5,100 miles of collector sanitary sewers, 154 pump stations, and four wastewater treatment plants.[14]

Wastewater generated by the proposed project would be treated at the Hyperion Treatment Plant.[15] The Hyperion Treatment Plant is located at 12000 Vista del Mar in Playa del Rey and is one of the largest wastewater treatment plants in the Los Angeles area. The facility provides both primary and secondary treatment for approximately 340 million gallons of wastewater per day (MGD).[16] The Hyperion Treatment Plant has a flow capacity of 450 MGD for secondary treatment and an 850 MGD wet weather capacity (during wet conditions, i.e., the rainy season).[17] The Hyperion Treatment Plant currently operates in conformance with the applicable standards of the Los Angeles Regional Water Quality Control Board (LA-RWQCB). The plant serves a population of approximately 4 million people throughout the County of Los Angeles.[18] The Hyperion Treatment Plant currently supports wastewater leaving the proposed project site. Currently, the existing land uses on the proposed project site generates wastewater which is discharged into the existing sewer lines.

Storm Drain System

The proposed project is a part the Los Angeles storm drain system. The LACDPW has implemented measures to initiate storm water pollution reduction programs throughout the County.[19] The proposed project is located on a previously developed site. The proposed project site is served by stormwater drains that convey stormwater away from the site. Currently, impervious surfaces on the proposed project site consist of buildings and paved areas, including parking lots, which cover the soil and do not allow for stormwater to percolate into the soil. Stormwater, which drains off the impervious surface areas of the site, is conveyed by gutters and catch basins into the system of stormdrains surrounding the project site. The County has adopted Stormwater Management Plans (SWMPs) requiring new development to meet the National Pollutant Discharge Elimination System (NPDES) requirements (including those related to storm drain and water discharge from a project site) through best management practices (BMPs).

The existing ground of the proposed project site has elevations ranging from approximately 86 to 88 feet above mean sea level (MSL). The proposed project site has the highest elevation at the eastern edge of the site; the elevation then dips towards the south and west.[20]

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[14] County of Los Angeles Department of Public Works. Accessed 19 April 2010. "Description of Engineering Programs." Available at: http://dpw.lacounty.gov/HRD/CEJobs/CEjobdescriptions.pdf

[15] Carr, Nancy, Hyperion Treatment Plant, Playa del Rey, CA. October 2009. Telephone correspondence with Ms. Eimon Raoof, Sapphos Environmental, Inc., Pasadena, CA.

[16] City of Los Angeles Hyperion Sewage. Accessed 19 October 2009. Web site. *City of Los Angeles Hyperion Sewage*. Available at: http://www.lastormwater.org/siteorg/general/hypern1.htm

[17] City of Los Angeles Hyperion Sewage. Accessed 19 October 2009. Web site. *City of Los Angeles Hyperion Sewage*. Available at: http://www.lastormwater.org/siteorg/general/hypern1.htm

[18] City of Los Angeles Hyperion Sewage. Accessed 19 October 2009. Web site. *City of Los Angeles Hyperion Sewage*. Available at: http://www.lastormwater.org/siteorg/general/hypern1.htm

[19] County of Los Angeles Department of Public Works. Accessed 2 October 2009. *Stormwater Pollution Prevention Home*. Available at: http://ladpw.org/PRG/StormWater/Page_03.cfm

[20] URS. 13 May 2009. *Draft Report Geotechnical Engineering Investigation, Proposed Parking Structure and MACC Building, Martin Luther King, Jr. Multi-Service Ambulatory Care Center (MLK-MACC), 12021 S. Wilmington Avenue, Los Angeles County, California*. Los Angeles, CA.

Water Supply

The proposed project is located in the Central Basin Municipal Water District (CBMWD or Central Basin) service area. The CBMWD is a wholesaler and purchases water from the Metropolitan Water District of Southern California (MWD). The CBMWD currently relies on approximately 90,600 acre-feet per year (AFY) of imported water from the State Water Project (SWP) and the Colorado River through MWD to meet its' demands.[21] The CBMWD service area uses approximately 315,000 acre feet of water annually. Annually, the CBMWD provides approximately 60,000 acre feet of imported water to a 227-square-mile service area, which includes 24 cities and the unincorporated areas of the County.[22] The purpose of the Central Basin's Urban Water Management Plan (UWMP) is to provide a summary of the agency's water supply and demands for their service area. The UWMP is intended to serve as a general, flexible, and open-ended document that periodically can be updated to reflect changes in the region's water supply trends as well as conservation and water use efficiency policies.[23] Table 3.13.2-1, *Central Basin's Current and Project Water Demand (AF)*, displays the Central Basin's current and project water demands.

TABLE 3.13.2-1
CENTRAL BASIN'S CURRENT AND PROJECTED WATER DEMAND (AF)

District Water Demands	2005[1]	2010	2015	2020	2025	2030
Retail Municipal & Industrial Use						
Groundwater[2]	186,549	202,000	202,000	202,000	202,000	202,000
Imported Water	61,033	59,091	64,691	70,462	74,409	82,535
Recycled Water[3]	5,217	12,900	14,150	15,400	16,650	17,900
Total Retail Demand	**252,799**	**273,991**	**280,841**	**287,862**	**295,059**	**302,435**
Replenishment Use						
Imported Water	27,758	27,600	27,600	27,600	27,600	27,600
Recycled Water	50,000	50,000	50,000	50,000	50,000	50,000
Total Replenishment Demand	**77,758**	**77,600**	**77,600**	**77,600**	**77,600**	**77,600**
TOTAL DEMAND	**330,557**	**351,591**	**358,441**	**365,462**	**372,659**	**380,035**

SOURCE: CBMWD, UWMP 2005.
1. The 2005 demands are based on the 2004-05 year, which is also considered one of the "wettest" years on record.
2. Includes groundwater production from the Central and Main San Gabriel Basins (est. 42,000 AF).
3. Includes recycled water sales from Central Basin's service area and Cerritos Water Systems.

The CBMWD's UWMP is also used as a tool to ensure future reliability. The UWMP is required to be updated every five years; the next update would take place in 2010.

The CBMWD serves more than 2 million people (including the unincorporated parts of the County) and would potentially supply water to the proposed project area. Water is transported through the Colorado River Aqueduct system and from Northern California to the Los Angeles area.[24] MWD's

[21] Central Basin Municipal Water District, 2005. *Urban Water Management Plan*. Carson, CA.

[22] Central Basin Municipal Water District. Accessed 7 October 2009. Web site. *Central Basin Municipal Water District.* Available at: http://www.centralbasin.org/

[23] Central Basin Municipal Water District, 2005. *Urban Water Management Plan*. Carson, CA.

[24] Central Basin Municipal Water District. Accessed on 22 June 2010. Web site. "Central Basin: About the District." Available at: http://www.centralbasin.org/aboutTheDistrict.html

demographic projections indicate that the population is anticipated to increase at an average of 3.01 percent every five years for the next 25 years or 0.64 percent annually (Table 3.13.2-2, *Population Projections for Central Basin's Service Area 2005 to 2030*).[25]

TABLE 3.13.2-2
POPULATION PROJECTIONS FOR CENTRAL BASIN'S SERVICE AREA[1] 2005 TO 2030

Year	2005	2010	2015	2020	2025	2030
Population	**1,614,400**	**1,655,200**	**1,712,300**	**1,768,000**	**1,821,200**	**1,872,500**
Single-family	291,200	300,200	301,800	311,400	320,500	323,800
Multi-family	124,900	132,600	147,000	153,400	160,200	172,900
Total Household	**416,100**	**432,800**	**448,800**	**464,800**	**480,700**	**496,700**
Persons per Household	3.84	3.78	3.78	3.77	3.75	3.74
Employment	591,700	659,700	682,600	702,600	720,500	736,900

SOURCE: 1. Information based on MWD Demographic Data, 2005.
NOTE: All units are rounded to the nearest hundred; totals may not sum exactly due to rounding.

The Central Basin has not incurred a significant increase in water demands over the last 15 years despite an increase in population annually (Table 3.13.2-3, *Projected Per Capita Retail Water Usage 2010–2030*)[26]

TABLE 3.13.2-3
PROJECTED PER CAPITA RETAIL WATER USAGE 2010–2030

Year	Estimated Population (1)	Retail Water Usage (AF) (2)	Per Capita (GPCD)
2010	1,655,200	273,991	148
2015	1,712,300	281,122	147
2020	1,768,000	287,400	145
2025	1,821,200	294,650	144
2030	1,872,500	301,900	144
		Average	**146**

NOTES:
1. Information based on MWD Demographic Data, 2005.
2. Retail Water Usage includes recycled water but does not include replenishment sales.

It is anticipated that by 2030, the resource mix on average would be 56 percent groundwater, 23 percent imported, and 5 percent recycled water, with conservation meeting the remaining 16 percent.[27]

In addition to MWD's various reliability initiatives, the Central Basin has also taken important steps during the past decade to reduce potential vulnerability to extended droughts. The CBMWD has made investments in recycled water to replace imported water for non-potable uses and implemented various conservation devices and increased education on conservation, which have resulted in more

[25] Central Basin Municipal Water District. 2005. *Urban Water Management Plan*, p. 2-2. Carson, CA.

[26] Central Basin Municipal Water District. 2005. *Urban Water Management Plan*, p. 2-2. Carson, CA.

[27] Central Basin Municipal Water District. 2005. *Urban Water Management Plan*, p. 2-2. Carson, CA.

self-reliance.[28] Furthermore, the CBMWD has a phased-level water shortage contingency plan, which includes protocols for a minimum, moderate, severe, or extreme water shortage among other conservation plans and programs (Table 3.13.2-4, *CBMWD's Stages of Action for a Water Shortage*).

TABLE 3.13.2-4
CBMWD'S STAGES OF ACTION FOR A WATER SHORTAGE

Water Shortage Level	Stage of Action
Minimum Shortage	The District would request for a voluntary effort among its customers to reduce imported water deliveries. In addition, the District would pursue an aggressive Public Awareness Campaign to encourage residents and industries to reduce their usage of water.
Moderate Shortage	In addition to the measures listed in the Minimum Storage stage above, the District would work with its customer agencies to promote and adopt water waste prohibitions and ordinances to discourage unnecessary water usage.
Severe Shortage	In addition to the two stages above, the CBMWD would seek to adopt a rate structure that penalizes increased water usage among its customer agencies.
Extreme Shortage	In addition to all the stages above, the CBMWD would call for the discontinuance of imported water based upon an allocation methodology similar to MWD for each of its customer agencies.

SOURCE: CBMWD, UWMP, 2005.

Recycled Water

The source of CBMWD's recycled water is the Sanitation Districts of Los Angeles County (Districts). The Districts operate one wastewater treatment plant and six water recycling plants in the Los Angeles Basin. These systems produce approximately 489 MGD of effluent, of which approximately one-third is available for re-use.[29] The CBMWD purchases a portion of this recycled water from two reclamation plants, Los Coyotes and San Jose Creek, located just outside of the District's service area. Both of these plants provide approximately 55 MGD of tertiary-treated (Title-22) water for distribution.[30] Recycled water is used for landscape maintenance, general irrigation (i.e., concrete mixing, cemetery etc.), and for various industrial uses throughout CBMWD's service area. The CBMWD's projected future uses of recycled water is provided in Table 3.13.2-5, *Projected Future Uses of Recycled Water (Acre Feet)*.

TABLE 3.13.2-5
PROJECTED FUTURE USES OF RECYCLED WATER (ACRE FEET)

Type of Use	2010	2015	2020	2025	2030
Irrigation	7,000	7,750	8,500	9,250	10,000
Commercial	0	0	0	0	0
Industrial	3,500	4,000	4,500	5,000	5,500
Total Projected Use	**10,500**	**11,750**	**13,000**	**14,250**	**15,500**

SOURCE: CBMWD, UWMP 2005.

The Park Water Company-Central Basin Division is the retailer that provides water services for the proposed project site. The Park Water Company (PWC) is an investor-owned, public water utility and

[28] Central Basin Municipal Water District. 2005. *Urban Water Management Plan*, p. 4-49, Carson, CA.

[29] Central Basin Municipal Water District. 2005. *Urban Water Management Plan*, p. 8-1, Carson, CA.

[30] Central Basin Municipal Water District. 2005. *Urban Water Management Plan*, p. 8-1. Carson, CA.

was incorporated on December 15, 1937. The PWC-Central Basin Division is located in the County of Los Angeles and includes three service areas: Bellflower/Norwalk, Lynwood/Rancho Dominguez (Compton East), and Compton/ Willowbrook (Compton West). PWC's provides for the collection, storage, distribution, and sale of water. The existing distribution system facilities include approximately 41 miles of pipeline ranging in size from 4-inch to 16-inch.[31] The PWC provides the Compton/Willowbrook area with water services and meets 95 percent of the Willowbrook community water demand with imported water. The remaining five percent is obtained from deep wells that pump groundwater from the Central Groundwater Basin. PWC currently delivers water to a population of approximately 132,600 through 27,000 service connections.[32]

The PWC's current water sources include approximately 86 percent of imported water, approximately 11 percent of groundwater, and approximately 3 percent of recycled water. PWC purchases imported domestic water from Metropolitan through CBMWD. The Metropolitan water supply is fed from the SWP water and the Colorado River water via the Colorado River Aqueduct (CRA).[33]

The PWC currently has 13 wells (6 active, 7 standbys) to supply approximately 1,500 AFY of groundwater ranging from 307 gallons per minute (gpm) to 1,250 gpm, with a total system capacity of approximately 9,657 gpm.[34] PWC also has two steel storage tanks with a combined capacity of 750,000 gallons and a 2-million-gallon concrete reservoir.[35] In addition, PWC maintains emergency interconnections with other retail water agencies serving adjacent areas and also has emergency generators for well sites in the event of power failures.

PWC uses a 0.7percent growth rate to project future population for their service area through 2030 (Table 3-13.2-6, *PWC's Central Basin Division Population Projections*).[36]

TABLE 3.13.2-6
PWC'S CENTRAL BASIN DIVISION POPULATION PROJECTIONS

System/ Connections	2000	People/ DU	2005	2010	2015	2020	2025	2030
Compton/ Willowbrook (Compton West) 6,500 connections	24,900	3.70	25,800	26,700	27,600	28.600	29,600	30,600

SOURCE: PWC, UWMP, 2005. 2000 population data based on interpolation of U.S. Census Tract data; future year projections based on Central Basin MWD's June 2005 Draft UWMP population projections for their overall service area, which is based on MWD-MAIN modeling data and SCAG data.

In 2004, approximately 86 percent of PWC's potable water supply came from imported water wholesaled by CBMWD through Metropolitan. PWC's use of recycled water augments groundwater and imported water within their service area (Table 3.13.2-7, *PWC's Current and Projected Water Supply (Acre Feet)*).

[31] Park Water Company. 2005. *Urban Water Management Plan*. Downey, CA.

[32] Park Water Company. 2005. *Urban Water Management Plan*. Downey, CA.

[33] Park Water Company. 2005. *Urban Water Management Plan*. Downey, CA.

[34] Park Water Company. 2005. *Urban Water Management Plan*. Downey, CA.

[35] Park Water Company. 2005. *Urban Water Management Plan*. Downey, CA.

[36] Park Water Company. 2005. *Urban Water Management Plan*. Downey, CA.

TABLE 3.13.2-7
PWC'S CURRENT AND PROJECTED WATER SUPPLY (ACRE FEET)

Water Supply Sources (gpm)	2005	2010	2015	2020	2025	2030
Imported Water	11,654	15,630	15,470	16,650	16,000	15,360
Groundwater	1,500	1,500	1,500	1,500	1,500	1,500
Recycled Water	470	470	470	470	470470	470
Total	13,624	17,600	17,440	18,620	17,970	17,330

SOURCE: PWC, UWMP, 2005.

The PWC-Central Basin Division is currently in the process of mechanically developing a new well (titled Well 19C) that will be located adjacent to their existing Reservoir titled 19B facility.[37] The PWC anticipates that this well will yield approximately 2,000 gpm and it would be completed in early 2011.[38]

Water use at the proposed project site while the hospital was fully operational, varied over time. Between 2002 to 2006, an average of more than 80 million gallons (or 107 thousand hundred cubic foot (HCF) unit) of water per year was used on the existing campus (Table 3.13.2-8, *Operational Water Use at the Proposed Project Site, 2002–2006*).[39,40]

TABLE 3.13.2-8
OPERATIONAL WATER USE AT THE PROPOSED PROJECT SITE
2002–2006

Fiscal Year	HCF (hundred cubic foot) Units	Gallons	Acre-Feet
2002–2003	104,572	78,219,856	240
2003–2004	118,426	88,582,648	271
2004–2005	104,494	78,161,512	239
2005–2006	103,681	77,553,388	238
4-year Average	**107,793**	**80,629,351**	**247**

SOURCE: Baseline water use information provided by the County of Los Angeles, 2009.

Hospitals use an average of 139,214 gallons per day of water on cooling, domestic, cleaning, kitchen, process, and other miscellaneous uses.[41] When the proposed project site was fully operating, the water consumption for the facility during the 2005–2006 fiscal year was 103,681 hundred cubic feet (approximately 77.6 million gallons).[42]

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[37] Elliott, Jim, Division Chief Engineer, Park Water Company. 18 May 2010. Personal communication with Sapphos Environmental, Inc., Pasadena, CA.

[38] Elliott, Jim, Division Chief Engineer, Park Water Company. 18 May 2010. Personal communication with Sapphos Environmental, Inc., Pasadena, CA.

[39] One (1) HCF equals to 748 gallons of water.

[40] White, Sabra, County of Los Angeles Chief Executive Office. 29 October 2009. E-mail to Eimon Raoof, Sapphos Environmental, Inc., Pasadena, CA.

[41] Southwest Florida Water Management District. "Hospital Checklist."

[42] White, Sabra, County of Los Angeles Chief Executive Office. 10 October 2009. E-mail to Eimon Raoof, Sapphos Environmental, Inc., Pasadena, CA.

Solid Waste

The Sanitation Districts of Los Angeles County operate solid waste collection facilities in the community surround the proposed project site. The Districts solid waste management sites similarly provide about half of the countywide solid waste management needs. The Districts operate three sanitary landfills, four landfill energy recovery facilities, two recycle centers, and three materials recovery/transfer facilities, and participate in the operation of two refuse-to-energy facilities (Table 3.13.2-9, *Solid Waste Facilities in the Los Angeles Area)*.[43,44]

TABLE 3.13.2-9
SOLID WASTE FACILITIES IN THE LOS ANGELES AREA[45,46]

Name / Operator	Address	Open to the Public?	Distance to Site
Angeles Western Paper Fibers Materials Recovery Facility (MRF) & Transfer Station / General Recycling Services	2474 Porter St. Los Angeles, CA 90021	Yes	7 miles north
Central LA Recycling Center and Transfer Station / City of Los Angeles	2201 E. Washington Blvd. Los Angeles, CA 90021	Yes	7 miles north
City Terrace Recycling Transfer Station / Robert M. Arsenian	1511 Fishburn Ave. Los Angeles, CA 90063	No	10 miles northeast
Commerce Refuse-to-Energy Facility / Sanitation Districts of Los Angeles County	5926 Sheila St. Commerce, CA 90040	Yes	7 miles northeast
Downey Area Recycling & Transfer / Sanitation Districts of Los Angeles County	9770 Washburn Rd. Downey, CA 90241	Yes	7 miles east
Downtown Diversion / Downtown Diversion, Inc.	2424 E. Olympic Blvd. Los Angeles, CA 90021	Yes	7 miles north
East Los Angeles Recycling & Transfer / East Los Angeles Transfer	1512 N. Bonnie Beach Pl. Los Angeles, CA 90063	No	10 miles northeast
Innovative Waste Control / Innovative Waste Control	4133 Bandini Blvd. Vernon, CA 90023	Yes	6 miles northeast
Mission Road Recycling & Transfer Station / Waste Management, Inc.	840 S. Mission Rd. Los Angeles, CA 90023	Yes	7 miles north

[43] Sanitation Districts of Los Angeles County. Accessed 19 April 2010. Web site. Available at: http://www.lacsd.org/about/default.asp

[44] Sanitation Districts of Los Angeles County. Accessed 19 October 2009. Web site. "Solid Waste Information." http://www.lacsd.org/info/solid_waste/default.asp

[45] County of Los Angeles Public Works. Accessed 7 October 2009. Web site. "Solid Waste Facilities in Los Angeles County." Available at: http://dpw.lacounty.gov/swims/general/facilities/nearestfacilitylist.asp

[46] County of Los Angeles Department of Public Works. 10 May 2007. Sanitation Districts of Los Angeles County. Accessed 7 October 2009. "Solid Waste Management In Los Angeles County - Disposal System Overview." Available at: http://ladpw.org/swims/Upload/SWM%20in%20LA%20County_7250.pdf

TABLE 3.13.2-9
SOLID WASTE FACILITIES IN THE LOS ANGELES AREA, Continued

Name / Operator	Address	Open to the Public?	Distance to Site
Paramount Resource Recycling Facility / Paramount Resource Recycling	7230 Petterson Ln. Paramount, CA 90723	Yes	4 miles southeast
Puente Hills Material Recovery Facility / Sanitation Districts of Los Angeles County	13130 Crossroads Pkwy S City of Industry, CA 91746	Yes	18 miles northeast
Salt Lake Transfer Station / City of South Gate	9525 Salt Lake South Gate, CA 90280	No	4 miles northeast
South Gate Transfer Station / Sanitation Districts of Los Angeles County	9530 S. Garfield Ave. South Gate, CA 90280	Yes	4 miles northeast
Waste Management South Gate Transfer Station / Waste Management, Inc.	4489 Ardine St. South Gate, CA 90280	Yes	4 miles northeast

SOURCE: Sanitation Districts of Los Angeles County, Web site 2009.

Landfills in the County of Los Angeles are categorized by three classes: Class I landfills are hazardous waste only landfills, Class II landfills are considered waste management units and accept specified hazardous waste and non-hazardous wastes, and Class III landfills dispose of non-hazardous waste.

Los Angeles County adopted an Integrated Waste Management Plan (IWMP) in 1997 to provide direction for Countywide waste management programs to reduce, reuse, recycle, and divert solid waste generated within the County. The IWMP was prepared in response to the Integrated Waste Management Act of 1989 (AB 939), and its associated regulations, which were developed by the California Integrated Waste Management Board (CIWMB).

Solid waste in the community of Willowbrook, which includes the proposed project site, may be taken to three facilities: the Downey Area Recycling and Transfer facility, the Puente Hills Materials Recovery facility or the South Gate Transfer Station facility. The Downey Area Recycling & Transfer (DART) facility is located at 9770 Washburn Road in the City of Downey, located approximately 7 miles east of the proposed project site. Waste collected is brought to the DART, which is owned by the County Sanitation Districts. This facility has a daily maximum permitted capacity of 5,000 tons of waste per day.[47]

The Puente Hills Materials Recovery facility is located at 13130 Crossroads Parkway South in the City of Industry, approximately 18 miles northeast of the proposed project site. The Puente Hills landfill, located near the City of Whittier, is one of the largest landfills in the nation. The Puente Hills landfill has a current tonnage of 562.34 as of April 19, 2010.[48] The Puente Hills landfill is a Class III landfill and accepts agricultural, ash construction/demolition, industrial, sludge, and tires type of waste, and accepts 13,200 tons of waste per day.[49] The Puente Hills landfill has a maximum permitted capacity of 106,400,000 cubic yards (cy) and a remaining capacity of 49,348,500 cy as of October 2006.[50] The

[47] Matthew, Staff, Downey Area Recycling & Transfer, Downey, CA. 19 October 2009. Telephone correspondence with Eimon Raoof, Sapphos Environmental, Inc., Santa Monica, CA.

[48] Sanitation Districts of Los Angeles County. Accessed on 19 April 2010. Web site. Available at: http://www.lacsd.org/info/solid_waste/timetoclose.asp

[49] California Department of Resources Recycling and Recovery. Accessed 17 March 2010. Facility Site Summary Details for Puente Hills Landfill. Available at: http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0053/Detail/

[50] California Department of Resources Recycling and Recovery. Accessed 17 March 2010. Facility Site Summary Details for Puente Hills Landfill, accessed at http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0053/Detail/

landfill has an estimated cease operation date of October 2013; however, the other providers have an adequate projected supply to service the proposed project. The South Gate Transfer Station is located at 530 South Garfield Avenue in the City of South Gate, roughly 4 miles northeast of the proposed project site. The South Gate Transfer Station has a daily maximum permitted capacity of 1,000 tons of waste per day.[51]

3.13.3 Significance Thresholds

The potential for the proposed project to result in impacts related to utilities and service systems was analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines. A project would normally be considered to have a significant impact to utilities and service systems if the proposed project would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Lack sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements;
- Result in a determination by the wastewater treatment provider that serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- Is not served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs;
- Does not comply with federal, state, and local statutes and regulations related to solid waste;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Lack sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements; or

[51] Amdahl, Mike, Coordinator, Sanitation Districts of Los Angeles County, South Gate, CA.19 October 2009. Telephone correspondence with Eimon Raoof, Sapphos Environmental, Inc., Santa Monica, CA.

- Result in a determination by the wastewater treatment provider that serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

3.13.4 Impact Analysis

The proposed project has been evaluated for conformity with the goals and programs of the County's General Plan related to utilities. The potential for adverse impacts on utilities has been evaluated based on information concerning current service levels and the ability of the service providers to accommodate the increased demand created by the project.

Storm Drain System

This issue, along with potential down gradient impacts, is analyzed in Section 3.7, *Hydrology and Water Quality*. The proposed project site is served by storm water drains that convey storm water away from the site.

Tier I

Impacts to storm drains related to the need for Tier I would be less than significant. The quality of storm water runoff is regulated under an existing Countywide NPDES permit. The NPDES storm water permit (CAS614001, Order No. 1-182) issued by the LA-RWQCB provides a mechanism for establishing appropriate controls and monitoring the discharge of pollutants to the storm water runoff system. The County requires all development projects within its jurisdiction on sites of 1 acre or larger to comply with the NPDES requirements for construction and operations as appropriate. The County has adopted SWMPs requiring new development to meet NPDES requirements through BMPs. Construction and demolition activities for the proposed project would be required to be completed in accordance with the County's NPDES permit, including incorporation of BMPs during construction, operation, and maintenance of the proposed project.

The County would be required to ensure that all permit requirements are met for the proposed project with implementation of standard BMPs to reduce or eliminate non-storm discharges to the storm water system for both construction and operation of the proposed project. Therefore, impacts to storm drains related to the need for Tier I would be less than significant.

Tier II

Implementation of the proposed project would increase the impervious surface area on the project site, with the largest change to occur in Tier II with the Master Plan mixed-use development. Currently, impervious surfaces on the proposed project site consist of buildings and paved areas, including parking lots, which cover the soil and do not allow for storm water to percolate into the soil. Storm water, which drains off the impervious surface areas of the site, is conveyed by gutters and catch basins into the system of storm drains surrounding the project site. With the proposed project, some undeveloped portions of the site would be covered with buildings and potentially parking areas, thus increasing the amount of storm water draining from the site. Proper design of landscape and on-site drainage features (such as bio swales and retention / detention basins to slow the runoff from the site) and site grading, as well as implementation of BMPs, would have the potential to assure that storm water runoff from the proposed project site is properly drained in accordance with County

requirements. As discussed in section The County shall ensure that the landscape features and site grading for the proposed project comply with standard BMPs set forth by the RWQCB.

The quality of storm water runoff is regulated under an existing Countywide NPDES permit. The NPDES storm water permit (CAS614001, Order No. 1-182) issued by the LA-RWQCB provides a mechanism for establishing appropriate controls and monitoring the discharge of pollutants to the storm water runoff system. The County requires all development projects within its jurisdiction on sites of one acre or larger to comply with the NPDES requirements for construction and operations as appropriate. The County has adopted SWMPs requiring new development to meet NPDES requirements through BMPs. Construction and demolition activities for the proposed project would be required to be completed in accordance with the County's NPDES permit, including incorporation of BMPs during construction, operation, and maintenance of the proposed project.

The County would be required to ensure that all permit requirements are met for the proposed project with implementation of standard BMPs to reduce or eliminate non-storm discharges to the storm water system for both construction and operation of the proposed project. Therefore, impacts to storm drains related to the need for Tier II development would be less than significant.

Water Supply

The CBMWD's 2005 UWMP factored in future growth within the County of Los Angeles and anticipates that the County has a reliable water source to supply future development based on the availability of groundwater resources. The UWMP anticipated the projected growth (generated from the proposed project and /or a combination of projects) when assessing its ability to meet normal, dry and multiple dry year water demand through 2025. The purpose of these plans is to ensure that groundwater supply resources are managed according to provide for the existing as well as future demand.

The proposed project would be expected to increase the water use demands at the proposed project site. A project is subject to SB 610 and requires the preparation of a Waster Supply Assessment (WSA) if it meets one of several criteria including:

> The project demands water use that is comparable to a 500 unit residential development (guidelines for other land uses include: a shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor area; a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor area; a hotel or motel with more than 500 rooms; an industrial facility employing more than 1,000 persons or having more than 250,000 square feet of floor area; or a mixed use facility that combined meets these guidelines).[52]

Therefore, the proposed project is subject to the requirements of SB 610 and a WSA has been prepared for the proposed project. Ultimately, the requirements of SB 610 and SB 221 mandate that proof of long-term water supply be confirmed by the water purveyor. Since adherence to these requirements is a condition of project approval, should the supplier be unable to supply long-term water to the project, the project would not be approved.

[52] *California Code of Regulations*. Title 14, Division 6, Chapter 3, Section 15155: "City or County Consultation With Water Agencies."

The proposed project would be expected to increase water usage during both construction and operation; however, it is not anticipated that the proposed project alone would result in the need for new water facilities or entitlements given that the proposed project area is well-served by major pipeline infrastructure for water supply; although a few new on-site infrastructure connections may be required for components in Tier II. Appropriate connections to water systems will be provided and adequately designed to the existing standards and will be approved during the County Building and Safety's site plan review. Therefore, the proposed project would not be expected to result in significant impacts to utilities and service systems requiring or producing construction of new water facilities.
The CBMWD groundwater supplies are managed according to the 2005 UWMP, which accounts for future growth within the basin. Several factors would drive future water demands, including population growth, housing density, employment, and household size. As discussed in Section 3.9, *Population and Housing*, projected population and housing growth associated with the proposed project would fall within the County's General Plan and SCAG's area projections and proposed project is located within a 2% Strategy Opportunities Area where population growth is desired and encouraged. As noted above, the current water demand generated by the existing uses within the project site is approximately 88 million gallons per annum. The new Multi-Service Ambulatory Care Center (MACC) building and associated uses, the addition of up to 100 net new residential units and up to 1,462,211 square feet of other uses, as allowed under Tier I and Tier II, would generate an increase in water use. Projected future water use at the proposed project site with implementation of Tier I were estimated and compared to past water usage at the site. Based on data provided for by the County and PWC, the proposed components in Tier I would not substantially increase the historical water usage at the medical campus (Appendix I, *Water Supply Assessment*).[53] Incorporating water conservation into project design for Tier I may result in decreased water consumption from historical usage.

As a whole, the proposed project would intensify the land uses within the project site such that it would increase water demand. The estimated Tier I project water demand is 185.3 AFY, which constitute an approximately one percent of PWC's projected demand for 2030 (Appendix I).[54] PWC projected its water demands would be lower than available projected supplies. The current water use is used as the baseline for existing conditions. When the proposed project's one percent increase to PWC's overall projected water demand is added to existing conditions, it can be concluded that there will be sufficient water supply to satisfy the proposed project's water demands, in association with other existing and planned future uses in the service territory (Appendix I).[55]

Tier I

Based on an evaluation of PWC's 2005 UWMP and MWD's 2005 UWMP, as well as the analysis conducted for this water supply assessment, there would be a sufficient water supply to meet the water demands of the proposed Tier I phase of the project through the 20-year planning period ending in 2030 (Appendix I).[56]

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[53] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by: RMT, Inc. Los Angeles, CA.

[54] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by: RMT, Inc. Los Angeles, CA.

[55] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by: RMT, Inc. Los Angeles, CA.

[56] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by: RMT, Inc. Los Angeles, CA.

Water use at the existing campus has varied over time. The average water use on the campus between the years 2002 and 2006 was more than 80 million gallons (or 107,793 hundred cubic foot unit) of water per year.[57] The maximum amount of water consumption at the campus was roughly 88 million gallons. It is anticipated that the maximum water consumption amounts for the campus following development of the Tier I component of the proposed project would be less than the historical use. Therefore, Tier I of the proposed project would not require or result in the construction of additional off-site water treatment facilities or expansion of existing facilities, which could cause significant environmental effects. Tier I of the proposed project would result in less than significant impacts with regard to water supply.

Tier II

It is anticipated that water consumption for the Tier II element of the proposed project would be greater than the historical use, without the incorporation of water efficiency and waste reduction measures, for the proposed project.

As stated above, the proposed development in Tier II would until the development of a mixed-use project that provided expanded health services necessary to respond to and address the community's needs. The land use designation for the property, as a medical facility and related services, would remain consistent with the current land use designation of the existing site. The proposed 100 residential units would be developed at a multi-family density, consistent with the surrounding residential area multi-family development densities.

Projected Tier II water demands were forecasted to the year 2030 under varying conditions. Demand projections are based on proposed Tier II activities. In all scenarios, the maximum capacities of proposed site services under Tier II are assumed. Currently, Tier II development includes commercial, retail, office, residential, and other campus support uses. Details for the Tier II phase are not yet complete and general assumptions were made based on planned square footage for each type of planned use, as specified in Section 2.0. The projected water demand for commercial/retail, medical office, general office, and campus support type buildings was estimated based on assumed number of employees, which was based on proposed square footage for each type of building use category (Appendix I and Table 3.13.4-1, *Tier II Projected Water Demand by Use Type*).[58]

TABLE 3.13.4-1
TIER II PROJECTED WATER DEMAND BY USE TYPE

Use Category	Proposed Tier II Square Footage	Projected Daily Water Use (GPD)	Projected Water Use (AFY)
Commercial/Retail	80,000	6,000	7
Residential	150,000	45,000	50
Medical Office	300,000	120,000	134
General Office	150,000	19,286	22
Additional Campus Support Buildings	1,134,695	204,245	229
Total	**1,814,695**	**394,531**	**442**

SOURCE: RMT, July 2010.

[57] One (1) hundred cubic foot unit equals 748 gallons of water.

[58] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by: RMT, Inc., Los Angeles, CA, p. 6-4.

Residential demand was based on average water usage per proposed number of units. It is important to note that these demands do not account for potential water use saving associated with implementing efficiency and conservation methods (Appendix I).[59]

The estimated Tier II project water demand is 442 AFY during a single normal year condition. The highest demand estimated for Tier II is 473.4 AFY, which would be during a single dry year or the first dry year of multiple dry year conditions (Appendix I).[60] These values do not account for possible water savings associated with implementing efficiency and conservation methods. Estimated Tier II water demands would constitute approximately 3 percent of PWC's projected demand for 2030.

PWC projected that its water supply would be greater than projected demands in all years through 2030 by at least 8 percent above demand (Appendix I).[61] By the year 2030, PWC estimates that it would have at least 2,340 acre-feet, 1,480 acre-feet and 1,400 acre-feet of water available over demand during a normal, single dry year, and multiple dry years, respectively. MWD also predicted sufficient supplies would be available through 2030. MWD anticipates over 130,000 AFY of surplus water by 2030. The estimated future water demand of the Tier II Phase only reflects approximately 0.3 percent of the surplus water that could be allocated to PWC to meet the demands of the project.

The proposed project would add only a three percent projected increase to the PWC's overall projected demand, thus, there would be sufficient water supply to satisfy the proposed project's water demands, in addition to other existing and planned future uses in the service territory (Appendix I).[62] Based on an evaluation of PWC's 2005 UWMP and MWD's 2005 UWMP, as well as the analysis conducted for this water supply assessment, a sufficient water supply would be available to meet the water demands of the proposed Tier II phase of the project through the 20-year planning period ending in 2030 (Appendix I).[63]

All new buildings in Tier II exceeding 10,000 square feet would be Leadership in Energy and Environmental Design (LEED) certified. It is anticipated that the County would implement sustainable and water efficient features into the Tier II project components. Therefore, the proposed project would not require or result in the construction of additional off-site water treatment facilities or expansion of existing facilities, which could cause significant environmental effects. Tier II of the proposed project would result in less than significant impacts with regard to water supply.

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[59] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by: RMT, Inc., Los Angeles, CA, p. 6-4.

[60] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by: RMT, Inc., Los Angeles, CA, p. 8-1.

[61] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by: RMT, Inc., Los Angeles, CA, p. 8-1.

[62] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by: RMT, Inc., Los Angeles, CA, p. 8-2.

[63] County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Project*. Prepared by: RMT, Inc., Los Angeles, CA p. 8-2.

Wastewater Treatment

Tier I

Tier I of the proposed project would generate a small amount of wastewater use during construction. However, this wastewater use would be temporary in nature and would not generate a substantial increase in amount that would require treatment or disposal.

Operation of the proposed project would shift land uses within the proposed project site, would result in a net reduction in operational floor area, and would, therefore, not result in an increased generation of wastewater at the site. The wastewater generation would shift from several of the existing structures to the new facilities on the campus. Additionally, water efficient features and sustainable project design elements would be expected to contribute to a reduction in wastewater generation.

Thus, Tier I of the proposed project would result in less than significant impacts related to wastewater treatment.

Tier II

Tier II of the proposed project would be expected to generate more wastewater use during construction than Tier I. The construction-related wastewater use would be temporary in nature and would not generate a substantial amount of wastewater. However, operation of Tier II of the proposed project would be expected to result in a significant increase in wastewater requiring treatment or disposal, which would require mitigation.

Operation of the proposed project would intensify land uses within the proposed project site and would, therefore, result in an increased generation of wastewater flows at the site. Any increase in wastewater generation would result in increased pressure on the current wastewater treatment system within the Sanitation Districts of Los Angeles County as a whole. The proposed project would be expected to result in less than significant impacts to utilities and service systems in relation to exceeding wastewater treatment requirements of the LA-RWQCB. Wastewater generated by the proposed project would be treated at the Hyperion Treatment Plant,[64] which provides both primary and secondary treatment for approximately 340 MGD.[65] The Hyperion Treatment Plant has an average flow capacity of 450 MGD and a total capacity of 850 MGD,[66] and currently operates in conformance with the applicable standards of the LA-RWQCB. The Hyperion Treatment Plant currently supports the wastewater leaving the medical campus. Although the proposed project would be expected to generate additional wastewater into the existing system, the project would not be anticipated to add additional water quality concerns beyond those already enforced and being met by the Hyperion Treatment Plant. Therefore, the proposed project would not be expected to result in exceedance of wastewater treatment requirements or require the expansion or construction of new water or wastewater treatment facilities.

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[64] Carr, Nancy, Hyperion Treatment Plant, Playa del Rey, CA. October 2009. Telephone correspondence with Eimon Raoof, Sapphos Environmental, Inc., Pasadena, CA.

[65] City of Los Angeles Hyperion Sewage. Accessed 19 October 2009. Web site. *City of Los Angeles Hyperion Sewage*. Available at: http://www.lastormwater.org/siteorg/general/hypern1.htm

[66] City of Los Angeles Hyperion Sewage. Accessed 19 October 2009. Web site. *City of Los Angeles Hyperion Sewage*. Available at: http://www.lastormwater.org/siteorg/general/hypern1.htm

The Hyperion Treatment Plant currently supports wastewater leaving the proposed project site and would continue to do so following the development of the proposed project. During the construction phase and development of Tier I and Tier II, the proposed project would not be expected to exceed the wastewater treatment requirements or standards of the RWQCB. The proposed project would connect to the existing wastewater system and would not include the development of major new sewer lines. While the increases in sewer generation are potentially significant on the proposed project level, it is not anticipated that the project alone would result in the need for substantial new wastewater treatment facilities. The Hyperion Plant collection system conveys over 6,500 miles of sewage ranging from 8 inches to 12 feet in diameter.[67] The community of Willowbrook sanitary sewer system carries wastewater from the proposed project site into the sanitary sewer system where it is conveyed to the Hyperion Treatment Plant.[68] The Hyperion Treatment Plant has the capacity to absorb projects that are consistent with regional growth projections established by the Southern California Association of Governments (SCAG). Although the proposed project would not be expected to significantly increase the population, the proposed project would be expected to increase generation of wastewater at the proposed site.

The general proposed project area is well-served by major pipeline infrastructure for wastewater collection, though some new project related connections on-site may be needed. The County Building and Safety's site plan review would assure that appropriate localized connections to wastewater systems are provided and adequately designed to the approved standards. Therefore, the proposed project would not be expected to result in impacts to utilities and service systems related to requiring or producing the construction of new wastewater treatment facilities.

The proposed project would be able to connect to the local sewer lines adjacent to various areas of the project site and/or convey any wastewater generated by the proposed project to the nearest local sewer or District's trunk sewer. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System. The fee can also be assessed when a project results in increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the sewerage system to accommodate the proposed project.[69] With the payment of these development fees to offset the additional demand imposed by the proposed project, impacts from the proposed project would be less than significant related to wastewater treatment facilities and infrastructure.

All expansions of the Districts' facilities shall be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the Counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial.[70] Thus, potentially significant impacts related to the proposed project would result in less than significant impacts with incorporation of mitigation measures.

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[67] City of Los Angeles Hyperion Sewage Treatment Plant. Accessed on 15 April 2010. Web site. *City of Los Angeles Department of Public Works, Bureau of Sanitation.* Available at http://www.lastormwater.org/siteorg/general/hypern1.htm

[68] Sanitation Districts of Los Angeles County. Accessed 7 October 2009. Web site. "Joint Water Pollution Control Plant." Available at: http://www.lacsd.org/about/wastewater_facilities/jwpcp/default.asp

[69] Sanitation Districts of Los Angeles County. Connection Fee Form. Accessed 2 July 2010. Available at: http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=2445

[70] Sanitation Districts of Los Angeles County. 24 July 2007. Letter from Ruth Frazen to County of Los Angeles Chief Executive Office. Subject: County of Los Angeles Data Center. Los Angeles, CA.

Solid Waste

The California Integrated Waste Management Act of 1989 (AB 939) requires the County to attain specific waste diversion goals.[71] In addition, the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires expanded or new development projects to incorporate storage areas for recycling bins into the proposed project design.[72] The County shall ensure that compliance with the California Integrated Waste Management Act of 1989 and the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, is maintained during construction and operation of the proposed project. Implementation of these measures shall comply with federal, state, and local statutes and regulations to reduce the amount of solid waste. The County shall ensure that the best method of solids disposal and reduction of the solid waste stream is implemented through the development and operation of the proposed project site.

As a County hospital, the proposed project would be required to demonstrate that all solid waste would be disposed of properly at the permitted facilities for solid waste (including medical hazardous waste). Therefore, the proposed project would be expected to result in less than significant impacts to utilities and service systems in relation to compliance with federal, state, and local statutes and regulations related to solid waste.

Tier I

Landfills

Tier I of the project would involve the development of buildings, as well as excavation, site clearance and grading. Construction activities would require the removal of asphalt and concrete, stucco, wood, and other materials from the project area (see Section 3.6, *Hazards and Hazardous Materials*, for a discussion of potential project construction and demolition hazards). In addition to the materials identified above, new construction would also generate solid waste consisting of cardboard and other paper products, metals, plastics and other building materials. Given the small extent of Tier I development, Tier I of the proposed project would not be expected to result in significant impacts to landfills.

Compliance

Tier I of the proposed project would result in net increase in land uses involving the construction of the new buildings and site improvements; however, Tier I of the proposed project would entail construction of a LEED-certified building, which would incorporate project requirements and features that would significantly contribute to the reduction of waste during both the construction and operational phases of this tier. Also, as previously noted, as a County hospital, the proposed project would be required to demonstrate that all solid waste would be disposed of properly at the permitted facilities for solid waste (including medical hazardous waste). Therefore, impacts from Tier I related to compliance would be less than significant.

[71] California Environmental Protection Agency. Accessed 7 October 2009. "The History of The Environmental Protection Agency, Integrated Waste Management Board." Available at: http://www.calepa.ca.gov/About/History01/ciwmb.htm

[72] *Public Resources Code*. 1991. Assembly Bill 1327, Chapter 18, Sections 42900 through 42911.

Tier II

As with Tier I, Tier II of the project would also involve the removal and development of buildings, as well as excavation, site clearance, and grading. However, Tier II construction activities would require demolition-related activities (associated with the removal of buildings) as well as a substantial amount of construction related activities including the removal of asphalt and concrete, stucco, wood, and other building materials from the project area (see Section 3.6, *Hazards and Hazardous Materials*, for a discussion of potential project construction and demolition hazards). In addition to the materials identified above, new construction would also generate solid waste consisting of cardboard and other paper products, metals, plastics, and other building materials.

Landfills

The primary landfills that would serve the project site are the South Gate Transfer Station, the DART, and the Puente Hills Landfill. Each of the landfills has the capacity to collect solid waste from the proposed project site. Therefore, the proposed project would be served by a landfill with sufficient space to accommodate the project's waste disposal needs. The increased intensity of development anticipated by implementation of the project would result in increased generation of solid waste. However, given the proposed build-out of Tier II, and the remaining capacity at each of the landfills that would service the proposed project; it is unlikely that any building component would exceed landfill capacity.

Compliance

As previously noted, as a County hospital, the proposed project would be required to demonstrate that all solid waste would be disposed of properly at the permitted facilities for solid waste (including medical hazardous waste), however, as a mixed use development, it is anticipated that the Tier II development may include non-County owned buildings, such as pharmacies or other retail establishments. It is therefore anticipated that there could be the potential for impacts associated with compliance of with existing regulations regarding solid waste and it is recommended that the County ensure compliance with existing regulations for all construction contractors during the mixed use development of Tier II of the proposed project. Therefore, impacts from Tier II related to compliance would be less than significant with the incorporation of mitigation measures.

Cumulative Impacts

The incremental impact of the proposed project, when added to the related past, present, or reasonably foreseeable, probable future projects listed in Section 2.0, *Project Description*, of this EIR would not be expected to result in cumulative impacts related to utilities and service systems. There are a total of 42 related projects surrounding the proposed project site, which are located within a 3-mile radius of the proposed project site.

Tier I

Tier I of the proposed project has been designed to result in no significant increase in storm water runoff, would not generate wastewater that would exceed the treatment requirements of the RWQCB, would not lack sufficient water supplies, and would not be served with a landfill that lacks sufficient capacity. With the incorporation of a mitigation measure related to reducing solid waste entering area landfills, Tier I of the proposed project would not result in a significant impact on utilities and would not have a cumulatively considerable contribution that would cause the need for additional utilities or

utility infrastructure. The cumulative impacts to utilities and service systems as a result of Tier I would be less than significant.

Tier II

Tier II of the proposed project along with the related projects listed in Section 2.0, *Project Description*, would cumulatively increase the demand for utilities within the region. However, the related projects are within various water provider service areas among other utilities service providers. Tier II of the proposed project is required to be evaluated with the local utilities suppliers' projections for water, wastewater, solid waste, and storm water drains. A WSA prepared for the proposed project, which was based on the UWMP, concluded that there would be enough water to serve Tier II in addition to other anticipated future developments. The proposed project was either within the forecasts or resulted in a less than significant impact after mitigation was incorporated. Tier II of the proposed project would increase the impervious surface area on the project site due to storm water and generate more wastewater than Tier I; however, the County would be required to ensure that all permit requirements are met for the proposed project with implementation of standard BMPs to reduce or eliminate non-storm discharges to the storm water system that would cause the storm water runoff impacts to be less than significant. The wastewater generated from Tier II would not generate a substantial amount that would require treatment or disposal. With the incorporation of mitigation measures for wastewater and solid waste, Tier I of the proposed project would not result in a significant impact on utilities and would not have a cumulatively considerable contribution that would cause the need for additional utilities or utility infrastructure. The cumulative impacts to utilities and service systems as a result of Tier I would be less than significant.

3.13.5 Mitigation Measures

Tier I

The analysis undertaken for this document determined that no significant utilities and service systems impacts would be expected to result from development of Tier I of the proposed project. Therefore, no mitigation measures are required for Tier I.

Tier II

Measure Utilities-1

Prior to issuance of the permits to connect to the sewer system, the County of Los Angeles shall ensure payment of the connection fee for the capital facilities has been submitted to the appropriate Sanitation Districts of Los Angeles County for compliance with the California Health and Safety Code.

Measure Utilities-2

The County of Los Angeles shall review the plans and specifications for the proposed project and the parking facilities to ensure that adequate service areas are provided for trash and recycling receptacles for compliance with applicable federal, state, and local statutes related to solid waste, and to reduce direct and cumulative impacts from project operation and maintenance to below the level of significance. Prior to advertising for construction bids for the new building, the County of Los Angeles shall ensure that the plans and specifications designating locations for trash receptacles and recycling receptacles are in conformance with the California Solid Waste Reuse and Recycling Access Act of 1991. Wherever trash receptacles are provided throughout the project site, a recycling receptacle for

plastic, aluminum, and metal shall also be provided. Signs encouraging patrons to recycle shall be posted near each recycling receptacle.

To ensure conformance with the Solid Waste Management Act of 1989, the County of Los Angeles shall require the construction contractor to manage the solid waste generated during construction of each element of the project by diverting at least 50 percent of solid waste from disposal in landfills, particularly Class III landfills, through source reduction, reuse, and recycling of construction and demolition debris. The construction contractor shall submit a construction solid waste management plan to the County of Los Angeles for approval prior to initiation of demolition activities. The construction contractor shall demonstrate compliance with the solid waste management plan through the submission of monthly reports during construction and demolition activities that estimate total solid waste generated and diversion of 50 percent of the solid waste.

3.13.6 Level of Significance after Mitigation

Tier II

Implementation of mitigation measures Utilities-1 and Utilities-2 would reduce impacts to utilities and service systems related to wastewater treatment and solid waste to below the level of significance.

SECTION 4.0
ALTERNATIVES TO THE PROPOSED PROJECT

This section of the Environmental Impact Report (EIR) describes alternatives to the proposed Martin Luther King, Jr., Medical Center Campus Redevelopment project (proposed project). Alternatives have been analyzed consistent with the recommendations of Section 15126.6 of the State California Environmental Quality Act Guidelines (State CEQA Guidelines), which require evaluation of a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the proposed project but would avoid or substantially lessen any of the significant effects of the proposed project, and evaluation of the comparative merits of the alternatives. The discussion of alternatives is intended to focus on the following criteria:

- Alternatives to the project or its location that may be capable of avoiding or substantially reducing any significant effects that a project may have on the environment

- Alternatives capable of accomplishing most of the basic objectives of the project and potentially avoid or substantially lessen one or more of the significant effects

- The provision of sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project

- The no project analysis of what would be reasonably expected to occur in the foreseeable future if the project were not approved

Pursuant to Section 15126.6(e)(2) of the State CEQA Guidelines, if the environmentally superior alternative is the No Project Alternative, the Supplemental EIR shall also identify an environmentally superior alternative among the feasible action alternatives. The analysis of alternatives has been limited to those that the County of Los Angeles (County) determines could feasibly attain most of the basic objectives of the project or which avoid the potential impacts related to the proposed project. Section of 15364 of the State CEQA Guidelines defines feasibility as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

Alternatives addressed in this EIR were derived from work undertaken by the County, as well as from comments that were received in response to the Notice of Preparation of the EIR and the comments provided by interested parties who attended the public scoping meeting.

The resulting range of alternatives considered in this Supplemental EIR consists of the following:

- No Project Alternative
- Alternative 1: Reduced Project Size Alternative (900,000 square foot Tier II)
- Alternative 2: Re-opening the Existing MACC Alternative
- Alternative 3: Public Transportation Focused Alternative
- Alternative 4: 500 beds (in Tier I Alternative)
- Alternative 5: No Tier II Alternative

The effectiveness of each of the alternatives to achieve the basic objectives of the proposed project has been evaluated in relation to the statement of objectives described in Section 2.0, *Project Description* of this EIR. A summary of the ability of the proposed project and alternatives under consideration to meet the objectives of the project is presented in Table 4-1, *Summary of Proposed Project and Alternatives' Ability to Attain Project Objectives*. As shown in Table 4-1, the proposed project would meet all of the basic objectives of the County. Although the No Project Alternative is the environmentally superior alternative, it is not capable of meeting most of the basic objectives of the proposed project, it has been analyzed as required by CEQA. Following the No Project Alternative, the No Tier II Alternative is the environmentally superior alternative.

TABLE 4-1
SUMMARY OF PROPOSED PROJECT AND ALTERNATIVES' ABILITY TO ATTAIN PROJECT OBJECTIVES

	Proposed Project	No Project	Alternative No. 1: Reduced Project Size	Alternative No. 2: Re-opening the Existing MACC	Alternative No. 3: Public Transportation Focused	Alternative No. 4: 500 beds	Alternative No. 5: No Tier II
Tier I: Project Development Objective							
1. Revitalize the Martin Luther King, Jr. Medical Center Campus through the provision of comprehensive medical care	Yes	No	Yes	No	No	Yes	Yes
2. Demonstrate leadership in sustainable planning and design	Yes	No	Yes	No	No	Yes	Yes
3. Create a campus environment that encourages pedestrian movement and optimizes connectivity, staff interaction, and links to the community	Yes	No	Yes	No	No	Yes	Yes
4. Develop a campus that is contextually integrated with the County of Los Angeles and respects the surrounding communities	Yes	No	Yes	No	No	Yes	Yes
5. Improve the efficiency and quality of staff and tenant services	Yes	No	Yes	No	No	Yes	Yes

TABLE 4-1
SUMMARY OF PROPOSED PROJECT AND ALTERNATIVES' ABILITY TO ATTAIN PROJECT OBJECTIVES, Continued

	Proposed Project	No Project	Alternative No. 1: Reduced Project Size	Alternative No. 2: Re-opening the Existing MACC	Alternative No. 3: Public Transportation Focused	Alternative No. 4: 500 beds	Alternative No. 5: No Tier II
6. Maintain the 2,100-square-foot Genesis Clinic; 2,580-square-foot Oasis Clinic (old); 1,850-square-foot Oasis Clinic (new); 10,950-square-foot Registration Building; 226,818-square-foot Augustus F. Hawkins Comprehensive Mental Health Center; 187,676-square-foot Inpatient Tower; 7,878-square-foot Pediatric Acute Care; 26,355-square-foot Medical Records and Laundry; 24,103-square-foot Central Plant; 15,648-square-foot Plant Management; 52,276-square-foot North Support Building; 34,762-square-foot South Support Building; 124,391-square-foot Interns and Physicians Building; 3,922-square-foot Claude Hudson Auditorium; 1,100-square-foot MRI Building; and 12,265-square-foot Hub Clinic Building	Yes	Yes	Yes	Yes	Yes	Yes	Yes
7. Provide a 24,700-building-gross-square-footage (BGSF) space to accommodate the Ancillary Building to house the cafeteria, administrative functions, and support services for the MACC and the Inpatient Tower	Yes	No	Yes	No	Yes	No	Yes

TABLE 4-1
SUMMARY OF PROPOSED PROJECT AND ALTERNATIVES' ABILITY TO ATTAIN PROJECT OBJECTIVES, Continued

	Proposed Project	No Project	Alternative No. 1: Reduced Project Size	Alternative No. 2: Re-opening the Existing MACC	Alternative No. 3: Public Transportation Focused	Alternative No. 4: 500 beds	Alternative No. 5: No Tier II
8. Provide a 132,000-BGSF space to accommodate the MACC program	Yes	No	Yes	No	Yes	No	Yes
9. Provide 34,000 square feet of tenant improvements to accommodate support functions in the North Support, South Support, Interns and Physicians, and Plant Management Buildings	Yes	No	Yes	No	Yes	No	Yes
10. Connect to an upgraded central plant to service the MACC, North Support Building, South Support Building, Inpatient Tower and Interns and Physicians Building	Yes	No	Yes	No	No	No	Yes
11. Provide a parking area to allow sufficient parking for patients, client, visitors, employees, medical staff; site work; and landscaping	Yes	No	Yes	Yes	No	Yes	Yes
12. Provide for a possible relocation of the MRI Building	Yes	No	Yes	No	No	No	Yes

TABLE 4-1
SUMMARY OF PROPOSED PROJECT AND ALTERNATIVES' ABILITY TO ATTAIN PROJECT OBJECTIVES, Continued

	Proposed Project	No Project	Alternative No. 1: Reduced Project Size	Alternative No. 2: Re-opening the Existing MACC	Alternative No. 3: Public Transportation Focused	Alternative No. 4: 500 beds	Alternative No. 5: No Tier II
Tier II: Master Plan Development Objective							
13. Provide opportunities for development of up to 1,814,696 square feet of mixed use, including medical office, commercial, retail, residential, recreational, office space, and other development in support of the campus that are appurtenant to and compatible with the primary land use of a community-based health program facility	Yes	No	No	No	No	No	No
14. Provide sufficient parking for mixed-use development	Yes	No	Yes	No	No	No	No

Table 4-2, *Tier I Summary of Proposed Project and Alternatives' Environmental Impacts*, provides a comparison of the CEQA impacts associated with the proposed project and the alternatives. Table 4-2 is followed by a detailed comparison of the proposed project and the alternatives.

TABLE 4-2
TIER I SUMMARY OF PROPOSED PROJECT AND ALTERNATIVES' ENVIRONMENTAL IMPACTS

	Proposed Project	No Project	Alternative No. 1: Reduced Project Size	Alternative No. 2: Re-opening the Existing MACC	Alternative No. 3: Public Transportation Focused	Alternative No. 4: 500 beds	Alternative No. 5: No Tier II
Aesthetics	Mitigation	Fewer	Equal	Fewer	Equal	Fewer	Equal
Air	Mitigation	Fewer	Equal	Fewer	Equal	Fewer	Equal
Cultural	Mitigation	Fewer	Equal	Fewer	Equal	Fewer	Equal
Geology and Soils	Mitigation	Fewer	Equal	Greater	Equal	Greater	Equal
Greenhouse Gas Emissions	Significant	Fewer	Equal	Fewer	Equal	Fewer	Equal
Hazards and Hazardous Materials	Mitigation	Fewer	Equal	Equal	Equal	Equal	Equal
Hydrology and Water Quality	Mitigation	Fewer	Equal	Greater	Equal	Greater	Equal
Noise	Significant	Fewer	Equal	Fewer	Equal	Fewer	Equal
Population and Housing	Less than	Equal	Equal	Equal	Equal	Equal	Equal
Public Services	Less than	Equal	Equal	Equal	Equal	Equal	Equal
Recreation	Less than	Equal	Equal	Equal	Equal	Equal	Equal
Transportation and Traffic	Mitigation	Fewer	Equal	Fewer	Fewer	Fewer	Equal
Utilities and Service Systems	Less than	Fewer	Equal	Greater	Equal	Greater	Equal

NOTES:
Considerations are based upon the overall worst impact of a particular environmental issue area
Less than – no impact or less than significant
Mitigation – less than significant after mitigation
Significant - significant after mitigation
Fewer / equal / greater refers to the comparison of the alternatives' impacts to the proposed project's impacts

Table 4-3, *Tier II Summary of Proposed Project and Alternatives' Environmental Impacts*, provides a comparison of the CEQA impacts associated with the proposed project and the alternatives.

TABLE 4-3
TIER II SUMMARY OF PROPOSED PROJECT AND ALTERNATIVES' ENVIRONMENTAL IMPACTS

	Proposed Project	No Project	Alternative No. 1: Reduced Project Size	Alternative No. 2: Re-opening the Existing MACC	Alternative No. 3: Public Transportation Focused	Alternative No. 4: 500 beds	Alternative No. 5: No Tier II
Aesthetics	Mitigation	Fewer	Fewer	Fewer	Equal	Fewer	Fewer
Air	Significant	Fewer	Fewer	Fewer	Equal	Fewer	Fewer
Cultural	Significant	Fewer	Equal	Fewer	Equal	Fewer	Fewer
Geology and Soils	Mitigation	Fewer	Fewer	Greater	Equal	Greater	Fewer
Greenhouse Gas Emissions	Significant	Fewer	Fewer	Fewer	Equal	Fewer	Fewer
Hazards and Hazardous Materials	Mitigation	Fewer	Fewer	Fewer	Equal	Fewer	Fewer
Hydrology and Water Quality	Mitigation	Fewer	Fewer	Equal	Equal	Equal	Fewer
Noise	Significant	Fewer	Fewer	Fewer	Equal	Fewer	Fewer
Population and Housing	Less than	Equal	Equal	Equal	Equal	Equal	Equal
Public Services	Less than	Equal	Equal	Equal	Equal	Equal	Equal
Recreation	Less than	Equal	Equal	Equal	Equal	Equal	Equal
Transportation and Traffic	Mitigation	Fewer	Fewer	Fewer	Fewer	Fewer	Fewer
Utilities and Service Systems	Mitigation	Fewer	Fewer	Equal	Equal	Equal	Fewer

NOTES:
Considerations are based upon the overall worst impact of a particular environmental issue area
Less than – no impact or less than significant
Mitigation – less than significant after mitigation
Significant - significant after mitigation
Fewer / equal / greater refers to the comparison of the alternatives' impacts to the proposed project's impacts

4.1 NO PROJECT ALTERNATIVE

4.1.1 Alternative Components

There are no components to the No Project Alternative. Under the No Project Alternative, the proposed project would not be constructed. The existing conditions at the site would remain unchanged. The existing structures would remain as they currently are and the limited operations at the hospital would continue as described in Section 2.0. The Tier I portion of the proposed project, construction of the new MACC and Ancillary building and site improvements would not be completed; nor would the Tier II master plan developments be completed under the No Project Alternative.

4.1.2 Objectives and Feasibility

Under the No Project Alternative, the objectives of the project would not be met. The No Project Alternative would not meet project objectives 1 through 5 nor would it satisfy objectives 7 through 14, as described in Table 4-1, *Summary of Proposed Project and Alternatives' Ability to Attain*

Project Objectives. Although this alternative would maintain the existing: 2,100-square-foot Genesis Clinic; 2,580-square-foot Oasis Clinic (old); 1,850-square-foot Oasis Clinic (new); 10,950-square-foot Registration Building; 226,818-square-foot Augustus F. Hawkins Comprehensive Mental Health Center; 187,676-square-foot Inpatient Tower; 7,878-square-foot Pediatric Acute Care; 26,355-square-foot Medical Records and Laundry; 24,103-square-foot Central Plant; 15,648-square-foot Plant Management; 52,276-square-foot North Support Building; 34,762-square-foot South Support Building; 124,391-square-foot Interns and Physicians Building; 3,922-square-foot Claude Hudson Auditorium; 1,100-square-foot MRI Building; and 12,265-square-foot Hub Clinic Building; as described in project objective 6 above; the No Project Alternative would not result in any new development or potential improvements to the existing campus for the community.

The No Project Alternative would not address the existing need for quality health care in the County and would not be a feasible alternative.

4.1.3 Construction Scenario

Under the No Project Alternative, no construction would occur. Therefore, no environmental impacts would occur. There would be no anticipated short-term, long-term, or cumulative construction related impacts.

The Tier I construction would not be required. There would be no construction related activities including grading or development on existing vacant lots under this alternative.

The phased development as identified in the Tier II construction scenario would not be required. Under this alternative, there would be no demolition, reuse, replacement, or removal of the existing buildings or construction related activities.

4.1.4 Comparative Impacts

Aesthetics

Tier I

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to aesthetics. Under the No Project Alternative, potential aesthetic changes relating to the replacement of existing site features would not occur. The project site would continue in its existing form with its visual and aesthetic character unchanged. Even though the aesthetic changes resulting from the proposed project would not be considered significant impacts, the No Project Alternative's impacts to aesthetics would be less because no change, such as increased nighttime lighting, would occur. As with Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to aesthetics with the No Project Alternative, implementation of measure Aesthetics-1 specified for Tier I of the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to aesthetics. Under the No Project Alternative, potential aesthetic changes relating to the replacement of existing site features would not occur. This alternative would not result in the more intensive development or the increase in nighttime lighting from

vehicles, buildings, landscape features, and signage associated with commercial uses under the proposed project. As a result, the project site would continue in its existing form with its visual and aesthetic character unchanged. Even though the aesthetic changes resulting from the proposed project would not be considered significant impacts, the No Project Alternative's impacts to aesthetics would be less because no change, such as increased nighttime lighting, would occur. As with Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to aesthetics with the No Project Alternative, implementation of measures Aesthetics-1 through Aesthetics-4 specified for Tier II of the proposed project would not be required.

Air Quality

Tier I

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to ambient air quality. The No Project Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike the proposed project, this alternative would not entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, or asphalt operations beyond the baseline conditions. The No Project Alternative would not require grading or the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of volatile organic compounds (VOCs). The No Project Alternative would not have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Unlike Tier I of the proposed project, the No Project Alternative would avoid potential significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors that would need mitigation measures to be reduced to less than significant levels. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to ambient air quality with the No Project Alternative, implementation of measures Air-1 through Air-9 would not be required.

Tier II

Unlike Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to ambient air quality. The No Project Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike the proposed project, this alternative would not entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, or asphalt operations beyond the baseline conditions. The No Project Alternative would not require grading or the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. The No Project Alternative would not have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Implementation of

Tier II the proposed project would be expected to result in cumulative construction-related impacts and impacts during operation that would remain above the level of significance with the incorporation of mitigation measures. Unlike Tier II of the proposed project, the No Project Alternative would avoid potential significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to ambient air quality with the No Project Alternative, implementation of measures Air-1 through Air-9 would not be required.

Cultural Resources

Tier I

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to cultural resources. The No Project Alternative would avoid the construction-related and redevelopment impacts to cultural resources that would occur as a result of the proposed project. Unlike Tier I of the proposed project, the No Project Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would not occur. As a result, the project site would continue in its existing form with its cultural resources unchanged. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to cultural resources with the No Project Alternative, implementation of measures Cultural-1 through Cultural-2 specified for Tier I of the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to cultural resources. The No Project Alternative would avoid the construction-related and redevelopment impacts to cultural resources that would occur as a result of the proposed project. Unlike Tier II of the proposed project, the No Project Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would not occur. As a result, the project site would continue in its existing form with its cultural resources unchanged. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to cultural resources with the No Project Alternative, implementation of Measures Cultural-1 through Cultural-5 specified for Tier II of the proposed project would not be required.

Geology and Soils

Tier I

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to geology and soils. The No Project Alternative avoids potential impacts to geology and soils that could result from the implementation of the proposed project. This alternative would avoid short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier I of the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures, or construction of new structures and implementation of the mitigation measures would not be required. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since

there would be no impacts to geology and soils with the No Project Alternative, implementation of measures Geology-1 through Geology-3 specified for Tier I of the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to geology and soils. The No Project Alternative avoids potential impacts to geology and soils that could result from the implementation of the proposed project. This alternative would avoid short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier II of the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures, or construction of new structures and implementation of the mitigation measures would not be required. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to geology and soils with the No Project Alternative, implementation of measures Geology-1 through Geology-3 specified for Tier II of the proposed project would not be required.

Greenhouse Gas Emissions

Tier I

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to greenhouse gas (GHG) emissions. The No Project Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike Tier I of the proposed project, this alternative would not entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, or electricity consumption beyond the baseline conditions. The No Project Alternative would not require the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to GHG emissions. Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to GHG emissions with the No Project Alternative, implementation of measure GHG-1 would not be required.

Tier II

Unlike Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to GHG emissions. The No Project Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike Tier II of the proposed project, this alternative would not entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, or electricity consumption beyond the baseline conditions. The No Project Alternative would not require the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to GHG emissions. Unlike Tier II of the proposed project, the No Project Alternative would not have the potential to directly or indirectly generate GHG emissions that may have a significant impact

on the environment; and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Potential GHG emission impacts associated with construction and operation of Tier II would remain as significant and unavoidable even with the incorporation of mitigation measures. Unlike Tier II of the proposed project, the No Project Alternative would avoid potential significant impacts to GHG emissions that would result from emissions from construction equipment, electricity consumption, and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to GHG emissions with the No Project Alternative, implementation of measure GHG-1 would not be required.

Hazards and Hazardous Materials

Tier I

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The No Project Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the proposed project. Unlike Tier I of the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6, *Hazards and Hazardous Materials*, would not be required. Potential operational impacts from hazards or hazardous materials would not occur. The No Project Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hazards and hazardous materials with the No Project Alternative, implementation of measures Hazards-1 through Hazards-5 specified for Tier I of the proposed project would not be required.

Tier II

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The No Project Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the proposed project. Unlike Tier I of the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6 would not be required. Potential operational impacts from hazards or hazardous materials would not occur. The No Project Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hazards and hazardous materials with the No Project Alternative, implementation of Measures Hazards-1 through Hazards-5 specified for Tier I of the proposed project would not be required.

Hydrology and Water Quality

Tier I

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to hydrology and water quality. The No Project Alternative avoids impacts to hydrology and water quality that could result from the implementation of the proposed project. Section 3.7, *Hydrology and Water Quality*, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier I of the proposed project, the No Project Alternative would entail no conversion of vacant land including grading, paving, and construction, and implementation of the mitigation measures would not be required. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hydrology and water quality with the No Project Alternative, implementation of measures Hydrology-1 through Hydrology-3 and Hazards-1 specified for Tier I of the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to hydrology and water quality. The No Project Alternative avoids impacts to hydrology and water quality that could result from the implementation of the proposed project. Section 3.7 of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier II of the proposed project, the No Project Alternative would entail no conversion of vacant land including grading, paving, and construction, and implementation of the mitigation measures would not be required. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hydrology and water quality with the No Project Alternative, implementation of measures Hydrology-1 through Hydrology-4 and Hazards-1 specified for Tier II of the proposed project would not be required.

Noise

Tier I

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to noise. The No Project Alternative would not entail for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Section 3.8, *Noise*, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier I of the proposed project, the No Project Alternative would not result in impacts related to noise and no mitigation measures would be required. The No Project Alternative would not result in short- or long-term impacts to noise. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to noise with the No Project Alternative, implementation of measures Noise-1 through Noise-3 specified for Tier I the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to noise. The No Project Alternative would not entail for short- and

long-term construction and operation impacts that would occur as a result of the proposed project. Section 3.8 of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier II of the proposed project, the No Project Alternative would not result in impacts related to noise and no mitigation measures would be required. The No Project Alternative would not result in short- or long-term impacts to noise. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to noise with the No Project Alternative, implementation of measures Noise-1 through Noise-4 specified for Tier II the proposed project would not be required.

Population and Housing

Tier I

As with Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to population and housing. The No Project Alternative would not assist in meeting regional housing and employment goals. Under the No Project Alternative, potential changes related to population and housing would not occur. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the proposed project, there would be no impacts to population and housing with the No Project Alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to population and housing. The No Project Alternative would not assist in meeting regional housing and employment goals. Under the No Project Alternative, potential changes related to population and housing would not occur. This alternative would not result in any residential development or more intensive development associated with the medical, commercial or retail uses under the proposed project. Even though potential impacts resulting from Tier II of the proposed project would not be considered significant impacts. The No Project Alternative's impacts to population and housing would be less than the proposed project because no change, such as the 100 unit residential component, would be implemented. However, the No Project Alternative would not contribute to the regional housing goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to population and housing with the No Project Alternative, and no mitigation measures would be required.

Public Services

Tier I

As with Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to public services. The No Project Alternative would not result in the need for additional fire protection, police protection, schools, parks, and other public services. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the proposed project, there would be no impacts to public services with the No Project Alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to public services. The No Project Alternative would not result in the need for additional fire protection, police protection, schools, parks, and other public services. Section 3.10, *Public Services*, of this EIR provides a discussion of the potential impact to public services related to Tier II of the proposed project. Like Tier II of the proposed project, the No Project Alternative would not create a significant net increase in public services and would require the implementation of the mitigation measures. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to public services with the No Project Alternative, and no mitigation measures would be required.

Recreation

Tier I

As with Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to recreation. The No Project Alternative would not result in impacts to parks and recreational facilities. The No Project Alternative would also not create an additional demand for the County's parks. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the proposed project, there would be no impacts to recreation with the No Project Alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to recreation. The No Project Alternative would not result in impacts to parks and recreational facilities. The No Project Alternative would also not create an additional demand for the County's parks. Tier II of the proposed project would not result in significant impacts to existing parks or recreational facilities given the limited number of residential units proposed under Tier II and the availability and location of existing recreational facilities. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to recreation with the No Project Alternative, and no mitigation measures would be required.

Transportation and Traffic

Tier I

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to transportation and traffic. The No Project Alternative avoids potential impacts to transportation and traffic that could result from the implementation of Tier I of the proposed project. The No Project Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier I of the proposed project, this alternative would create no additional transportation or circulation components and implementation of the mitigation measures would not be required. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to transportation and traffic with the No Project

Alternative, implementation of measure Traffic-1 specified for Tier I of the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to transportation and traffic. The No Project Alternative avoids potential impacts to transportation and traffic that could result from the implementation of Tier II of the proposed project. The No Project Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the proposed project. Unlike the Tier II of proposed project, this alternative would create no additional transportation or circulation components and implementation of the mitigation measures would not be required. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to transportation and traffic with the No Project Alternative, implementation of measures Traffic-1 through Traffic-3 specified for Tier II of the proposed project would not be required.

Table 4.1.4-1, *Alternatives Analysis – Summary and Comparison of Net Trip Generation Estimates*, summarizes the net trip generation estimates of all project alternatives as well as a comparison of those estimates to that of the proposed project. This table should be referenced for all of the traffic impacts related to each of the mitigation measures described in this section. Additional trip generation tables as well as other calculations such as internal capture, and pass-by trips for the alternatives to the proposed project are provided in Appendix H, *Traffic Study*. The differences in trip generation estimates of the various alternatives in relation to those of the proposed project expressed in net AM, PM, and daily total trip ends as well as percentages are all shown in Table 4-2 as well. As indicated in the table, all of the proposed alternatives would generate less trips than the proposed project.

TABLE 4.1.4-1
ALTERNATIVES ANALYSIS - SUMMARY AND COMPARISON OF NET TRIP GENERATION ESTIMATES

Scenario	Daily	AM Peak Hour			PM Peak Hour		
	Total	In	Out	Total	In	Out	Total
Proposed Project							
Total Net Trip Generation - Tier I + II	19,677	921	319	1,240	568	1,185	1,753
No Project Alternative	0	0	0	0	0	0	0
Difference from Proposed Project	(19,677)	(921)	(319)	(1,240)	(568)	(1,185)	(1,753)
% Difference	*-100%*	*-100%*	*-100%*	*-100%*	*-100%*	*-100%*	*-100%*
Alternative 1 - Reduced Project Size							
Alternative (900,000 square feet in Tier II)	7,004	347	66	413	205	505	710
Difference from Proposed Project	(12,673)	(574)	(253)	(827)	(363)	(680)	(1,043)
% Difference	*-64%*	*-62%*	*-79%*	*-67%*	*-64%*	*-57%*	*-59%*
Alternative 2 - Re-opening of the Existing							
MACC Alternative (250 Beds)	0	0	0	0	0	0	0
Difference from Proposed Project	(19,677)	(921)	(319)	(1,240)	(568)	(1,185)	(1,753)
% Difference	*-100%*	*-100%*	*-100%*	*-100%*	*-100%*	*-100%*	*-100%*
Alternative 3 - Public Transportation							
Focused Alternative	17,709	829	287	1,116	511	1,067	1,578
Difference from Proposed Project	(1,968)	(92)	(32)	(124)	(57)	(118)	(175)
% Difference	*-10%*	*-10%*	*-10%*	*-10%*	*-10%*	*-10%*	*-10%*
Alternative 4 - 500 Beds (in Tier I) Alternative	0	0	0	0	0	0	0
Difference from Proposed Project	(19,677)	(921)	(319)	(1,240)	(568)	(1,185)	(1,753)
% Difference	*-100%*	*-100%*	*-100%*	*-100%*	*-100%*	*-100%*	*-100%*
Alternative 5 - No Tier II Alternative *	(4,905)	(196)	(136)	(332)	(142)	(196)	(338)
Difference from Proposed Project	(24,582)	(1,117)	(455)	(1,572)	(710)	(1,381)	(2,091)
% Difference	*>-100%*	*>-100%*	*>-100%*	*>-100%*	*>-100%*	*>-100%*	*>-100%*

NOTE: * In this 'No Tier II Alternative', existing buildings with entitlements will be reduced in entitlements by relinquishing those uses from the buildings.

Utilities and Service Systems

Tier I

Unlike Tier I of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to utilities and service systems. The No Project Alternative avoids potential impacts to utilities and service systems that could result from the implementation of Tier I of the proposed project. The No Project Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Like Tier I of the proposed project, this alternative would not require mitigation however, unlike Tier I of the proposed project, this alternative would entail no additional construction of buildings and would not require additional use of existing infrastructure (i.e., sewer, water, etc.).

Tier II

Unlike Tier II of the proposed project, the No Project Alternative would not have the potential to result in significant impacts to utilities and service systems. The No Project Alternative avoids potential impacts to utilities and service systems that could result from the implementation of Tier II of the proposed project. The No Project Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the proposed project. Unlike the proposed project, this alternative would entail no additional construction of buildings and would not require additional use of existing infrastructure (i.e., sewer, water, etc.). With the No Project Alternative, mitigation measures would not be required. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to utilities and service systems with the No Project Alternative, implementation of Measures Utilities-1 through Utilitites-2 specified for Tier II of the proposed project would not be required.

4.2 ALTERNATIVE 1: REDUCED PROJECT SIZE ALTERNATIVE (900,000 SQUARE FOOT TIER II)

4.2.1 Alternative Components

The Reduced Project Size Alternative would entail the same elements that are described in Tier I of the proposed project. As with the proposed project, this alternative would be located on the existing Martin Luther King Jr. Medical Center campus (existing campus). This alternative would entail the same project-level development and improvements described in Tier I of the proposed project including: the development of two new buildings: the new approximately 132,000 square foot MACC and the approximately 24,700 square foot Ancillary Building; tenant improvements in existing buildings including: improvements in the North Support Building to provide space for the MACC administrative departments, the South Support Building would be reorganized to serve as the main warehouse for the MACC, the South Support Building may also serve as a central distribution center for other Los Angles County healthcare facilities in the area, and other tenant improvements would be performed in the Interns and Physicians and Plant Management Buildings for support functions to the MACC; site improvements including: a new parking area, new parking lots, re-striping of existing lots, and new landscaping at the entry of the new MACC and its surrounding area, and a service yard with technical (tech) dock positions that connect mobile radiology; and the potential relocation of the MRI Building.

The Reduced Project Size Alternative would vary from the proposed project in its development of Tier II. Under this alternative, there would still be a campus-wide master plan and the respective improvements, the buildings that were identified as being replaced, removed, or reused in the proposed project would be the same; however the potential build-out for this alternative would be less than half of the development that would be included in the proposed project. This alternative would entail a maximum potential build-out of 900,000 square feet in its Tier II component. The reuse, replacement, or removal of the buildings that were identified in Section 2.0, Project Description, would be reused, replaced, or removed. The mixed uses including medical office, commercial, retail, office space, recreation, residential, and other development in support of the campus would be feasible, however, they would be developed at a reduced scale, which may limit the amount and propensity of the proposed development.

4.2.2 Objectives and Feasibility

As shown in Table 4-1, *Summary of Proposed Project and Alternatives' Ability to Attain Project Objectives*, the Reduced Project Size Alternative would meet most of the objectives identified by the County. As with the proposed project, objectives 1-12 and 14 would be met; however, this alternative would not meet objective 13 as described in Table 4-1. While the Reduced Project Size Alternative would include Tier I elements, the master campus plan development would be limited to less than half of the potential development that is being considered at the proposed project site. This alternative would be feasible but it would require a reduced scale, scope, and limited site configurations that may not fully include all of the mixed use components described in the proposed project.

4.2.3 Construction Scenario

The Reduced Project Size Alternative, the construction scenario described for Tier I of the proposed project in Section 2.0 of this EIR would occur. This alternative would require a reduced construction scenario for its 900,000 square foot Tier II campus master plan element. Although it is anticipated that the duration of the Tier II element would remain approximately 10 years, the scale and the scope of the construction would be roughly reduced by half. However, the maximum daily construction activity would likely be similar to the proposed project scenario.

4.2.4 Comparative Impacts

Aesthetics

Tier I

As with Tier I of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to aesthetics. The Reduced Project Size Alternative for Tier II, this alternative reduces impacts to aesthetics that could result from the implementation of the proposed project. This alternative would have the same visual character (i.e., building design, etc.) as Tier I of the proposed project. Thus, the Reduced Project Size Alternative would result in similar aesthetic impacts as Tier I of the proposed project. This alternative would not substantially degrade the visual character of the site and its surroundings but would still require mitigation for light and glare and shade and shadow. Impacts would be less than significant with mitigation incorporated. This alternative is considered to have the same Tier I visual impacts as compared to the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to aesthetics with the Reduced Project Size Alternative, it is expected that implementation of measures Aesthetics-1 specified for Tier I of the proposed project would be required.

Tier II

As with Tier II of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to aesthetics. The Reduced Project Size Alternative for Tier II, this alternative reduces impacts to aesthetics that could result from the implementation of the proposed project. This alternative would not result in the long-term operation impacts that would occur as a result of the proposed project. This alternative would generally have a similar visual character (i.e., building design, etc.) as the proposed project but would reduce the building square footage associated with Tier II. Thus, the Reduced Project Size Alternative would result in similar

aesthetic impacts as the proposed project but to a lesser degree. This alternative would not substantially degrade the visual character of the site and its surroundings but would still require mitigation for light and glare and shade and shadow. Impacts would be less than significant with mitigation incorporated. This alternative is considered to have reduced visual impacts as compared to the proposed project given the reduction in development. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to aesthetics with the Reduced Project Size Alternative, it is expected that implementation of measures Aesthetics-1 through Aesthetics-4 specified for the proposed project would be required.

Air Quality

Tier I

As with Tier I of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Reduced Project Size Alternative would require the same Tier I elements, the Reduced Project Size Alternative is considered to have comparable impacts to air quality compared with Tier I of the proposed project. As with the proposed project, the Reduced Project Size Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with Tier I of the proposed project, this alternative would entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, and asphalt operations beyond the baseline conditions. The Reduced Project Size Alternative would require grading and the use of construction equipment, thus resulting in potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. As with Tier I of the proposed project, the Reduced Project Size Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. As with the Tier I proposed project, the Reduced Project Size Alternative would result in potentially significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Reduced Project Size Alternative, it is expected that implementation of measures Air-1 through Air-9 specified for the proposed project would be required.

Tier II

As with Tier II of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Reduced Project Size Alternative would require less construction and less vehicle trips than Tier II of the proposed project, the Reduced Project Size Alternative is considered to have lesser impacts to air quality compared with Tier II of the proposed project. However, as with Tier II of the proposed project, the Reduced Project Size Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with Tier II of the proposed project, this alternative would entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, and asphalt operations beyond the baseline

conditions. The Reduced Project Size Alternative would require grading and the use of construction equipment, thus resulting in potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. As with the proposed project, the Reduced Project Size Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. As with Tier II of the proposed project, the Reduced Project Size Alternative would result in potentially significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Reduced Project Size Alternative, it is expected that implementation of measures Air-1 through Air-9 specified for the proposed project would be required.

Cultural Resources

Tier I

As with Tier I the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to cultural resources. This alternative would result in reduced impacts to paleontological resources, archeological resources, and human remains and similar impacts to historical resources that would result from the implementation of the proposed project. Under this alternative, the scale and scope of construction-related activities would be consistent with Tier I development and would result in the reduced potential to encounter paleontological resources, archeological resources, and human remains. Therefore, the Reduced Project Size Alternative would be anticipated to have fewer potential impacts to paleontological resources, archeological resources, and human remains. However, the buildings that were identified as being vacated in Tier I of the proposed project would remain the same. This alternative would still require mitigation for redevelopment impacts to reduce impacts. Like Tier I of the proposed project, this alternative would have the potential to result in cumulatively considerable impacts. Since there would be potential impacts to cultural resources with the Reduced Project Size Alternative, it is expected that implementation of measures Cultural-1 through Cultural-2 specified for Tier I of the proposed project would be required.

Tier II

As with Tier II the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to cultural resources. This alternative would result in reduced impacts to paleontological resources, archeological resources, and human remains and similar impacts to historical resources that would result from the implementation of Tier II of the proposed project. Under this alternative, the reduced scale and scope of construction-related activities would result in the reduced potential to encounter paleontological resources, archeological resources, and human remains. Therefore, the Reduced Project Size Alternative would be anticipated to have fewer potential impacts to paleontological resources, archeological resources, and human remains. However, the buildings that were identified as being replaced, reused, or removed in Tier II of the proposed project would remain the same, resulting in similar impacts to historical resources as the proposed project. This alternative would still require mitigation for redevelopment impacts to reduce impacts to the maximum extent feasible. Impacts to historical resources would remain a significant adverse impact. Like Tier II of the proposed project, this alternative would have the potential to result in cumulatively considerable impacts. Since there would be potential impacts to

cultural resources with the Reduced Project Size Alternative, it is expected that implementation of measures Cultural-1 through Cultural-5 specified for Tier II of the proposed project would be required.

Geology and Soils

Tier I

As with Tier I of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to geology and soils. The Reduced Project Size Alternative would result in comparable impacts to geology and soils that could result from the implementation of Tier I of the proposed project. This alternative would entail the same amount of grading (excavation and fill), modification of existing structures, or construction of new structures. The Reduced Project Size Alternative would be comparable to Tier I of the proposed project when considering only potential impacts to geology and soils. Llike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to geology and soils with the Reduced Project Size Alternative, it is expected that implementation of measures Geology-1 through Geology-3 specified for the proposed project would be required.

Tier II

As with Tier II of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to geology and soils. The Reduced Project Size Alternative would result in fewer potential impacts to geology and soils that could result from the implementation Tier II of the proposed project. Unlike Tier II of the proposed project, this alternative would entail less grading (excavation and fill), modification of existing structures, or construction of new structures. The implementation of the mitigation measures would be required to a lesser extent. The Reduced Project Size Alternative would be preferable to Tier II of the proposed project when considering only potential impacts to geology and soils. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to geology and soils with the Reduced Project Size Alternative, it is expected that implementation of measures Geology-1 through Geology-3 specified for Tier II the proposed project would be required.

Greenhouse Gas Emissions

Tier I

As with Tier I of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to greenhouse gas emissions. Due to the fact that the Reduced Project Size Alternative would require comparable construction, electricity consumption, and vehicle trips as Tier I of the proposed project, the Reduced Project Size Alternative is considered to have comparable impacts to GHG emissions compared with Tier I of the proposed project. As with Tier I of the proposed project, the Reduced Project Size Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with Tier I of the proposed project, this alternative would entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, and electricity consumption beyond the baseline conditions. As with Tier I of the proposed project, the Reduced Project Size Alternative

would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As with Tier I of the proposed project, the Reduced Project Size Alternative would result in potentially significant impacts to GHG emissions that would result from emissions from construction equipment, electricity consumption, and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to GHG emissions with the Reduced Project Size Alternative, it is anticipated that implementation of mitigation measure GHG-1 would be required.

Tier II

As with Tier II of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to greenhouse gas emissions. Due to the fact that the Reduced Project Size Alternative would require less construction, less electricity consumption, and less vehicle trips than the proposed project, the Reduced Project Size Alternative is considered to have lesser impacts to GHG emissions compared with Tier II of the proposed project. However, as with Tier II of the proposed project, the Reduced Project Size Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with the Tier II of the proposed project, this alternative would entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, and electricity consumption beyond the baseline conditions. As with Tier II of the proposed project, the Reduced Project Size Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As with Tier II of the proposed project, the Reduced Project Size Alternative would result in potentially significant impacts to GHG emissions that would result from emissions from construction equipment, electricity consumption, and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to GHG emissions with the Reduced Project Size Alternative, it is anticipated that implementation of mitigation measure GHG-1 would be required.

Hazards and Hazardous Materials

Tier I

As with Tier I of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to hazards and hazardous materials. The Reduced Project Size Alternative would result in comparable potential impacts to hazards and hazardous materials that could result from the implementation of Tier I of the proposed project. Like Tier I of the proposed project, this alternative would entail less grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the mitigation measures would be required. Potential operational impacts from hazards or hazardous materials would be comparable to Tier I of the proposed project. The Reduced Project Size Alternative would result in both short- and long-term impacts from hazards and hazardous materials. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential

impacts to hazards and hazardous materials with the Reduced Project Size Alternative, it is expected that implementation of measures Hazards-1 through Hazards-5 specified for Tier I of the proposed project would be required.

Tier II

As with Tier II of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to hazards and hazardous materials. The Reduced Project Size Alternative would result in fewer potential impacts to hazards and hazardous materials that could result from the implementation of Tier II of the proposed project. Unlike Tier II of the proposed project, this alternative would entail less grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the mitigation measures would be required, but not to the extent that would be required for implementation of the proposed project. Potential operational impacts from hazards or hazardous materials would be less than Tier II of the proposed project. The Reduced Project Size Alternative would result in less short- or long-term impacts from hazards and hazardous materials. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hazards and hazardous materials with the Reduced Project Size Alternative, it is expected that implementation of measures Hazards-1 through Hazards-5 specified for Tier II of the proposed project would be required.

Hydrology and Water Quality

Tier I

As with Tier I the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to hydrology and water quality. Due to the fact that the Reduced Project Size Alternative would require the same construction as Tier I, the Reduced Project Size Alternative would result in the same potential impacts to hydrology that could result from the implementation of Tier I of the proposed project. Under this Alternative, the scale and scope of construction-related activities would entail comparable grading (excavation and fill), therefore the potential impact to surface water quality from erosion and runoff into storm drain systems would be the same. As with Tier I of the proposed project the potential for construction related or accidental releases of petroleum products and other hazardous substances that could result in contamination of surface water through transport of pollutants into the storm drain system. This alternative would still require all of the hydrology mitigation measures that for are required for Tier I of the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the Reduced Project Size Alternative, it is expected that implementation of measures Hydrology-1 through Hydrology-3 and Hazards-1 specified for the proposed project would be required.

Tier II

As with Tier II the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to hydrology and water quality. Due to the fact that the Reduced Project Size Alternative would require less construction, the Reduced Project Size Alternative would result in fewer potential impacts to hydrology that could result from the implementation of Tier II of the proposed project. Under this Alternative, the reduced scale and scope of construction-

related activities in Tier II would entail less grading (excavation and fill), therefore the potential impact to surface water quality from erosion and runoff into storm drain systems would be less. A smaller project scale would also reduce the potential for construction related or accidental releases of petroleum products and other hazardous substances that could result in contamination of surface water through transport of pollutants into the storm drain system. This alternative would still require all of the hydrology mitigation measures that for are required for Tier II of the proposed project. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the Reduced Project Size Alternative, it is expected that implementation of measures Hydrology-1 through Hydrology-4 and Hazards-1 specified for the proposed project would be required.

Noise

Tier I

As with Tier I of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to noise. Due to the fact that the Reduced Project Size Alternative would require the same construction and vehicle trips as Tier I of the proposed project, the Reduced Project Size Alternative is considered to have comparable impacts to noise compared with Tier I of the proposed project. Additionally, the Reduced Project Size Alternative would have construction related activities that would be comparable to Tier I of the proposed project. As with Tier I of the proposed project, the Reduced Project Size Alternative would require grading and the use of construction equipment, thus resulting in potentially significant impacts related to noise. The Reduced Size Alternative would have construction related impacts to noise that would be comparable to Tier I of the proposed project. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to noise with the Reduced Project Size Alternative, it is expected that implementation of measures Noise-1 through Noise-3 specified for Tier I of the proposed project would be required.

Tier II

As with Tier II of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to noise. Due to the fact that the Reduced Project Size Alternative would require less construction and less vehicle trips than Tier II of the proposed project, the Reduced Project Size Alternative is considered to have lesser impacts to noise compared with Tier II of the proposed project. However, the Reduced Project Size Alternative would have construction related activities that would be comparable to Tier II of the proposed project. As with Tier II of the proposed project, the Reduced Project Size Alternative would require grading and the use of construction equipment, thus resulting in potentially significant impacts related to noise. The Reduced Size Alternative would have construction related impacts to noise that would be less than with Tier II of the proposed project. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to noise with the Reduced Project Size Alternative, it is expected that implementation of measures Noise-1 through Noise-4 specified for Tier II of the proposed project would be required.

Population and Housing

Tier I

As with Tier I of the proposed project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to population and housing. This alternative would generally have a similar population, housing and or growth impact as Tier I of the proposed project. Thus, the Reduced Project Size Alternative would result in similar population and housing impacts as Tier I of the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the proposed project, there would be no impacts to population and housing with the Reduced Project Size Alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to population and housing. This alternative would generally have a similar population, housing and or growth impact as with Tier II of the proposed project but would reduce the building square footage associated with Tier II. Thus, the Reduced Project Size Alternative would result in similar population and housing impacts as Tier II of the proposed project but to a lesser degree. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to population and housing with the Reduced Project Size Alternative, and no mitigation measures would be required.

Public Services

Tier I

As with Tier I of the proposed project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to public services. As with Tier I of the proposed project, the Reduced Project Size Alternative would have not be expected to result in significant impacts to fire protection, police protection, parks, schools, and other public services as Tier I of the proposed project due to increased need for public services. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the proposed project, there would be no impacts to public services with the Reduced Project Size Alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to public services. As with Tier II of the proposed project, the Reduced Project Size Alternative would have not be expected to result in significant impacts to fire protection, police protection, parks, schools, and other public services as Tier II of the proposed project due to increased need for public services. This alternative however, would reduce the development in Tier II and as such would have less development and less of a potential to result in impacts to public services than the implementation of the proposed project. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to public services with the Reduced Project Size Alternative, and no mitigation measures would be required.

Recreation

Tier I

As with Tier I of the proposed project, the Reduced Project Size Alternative would not have the potential to result in the same development as Tier I of the proposed project. As with Tier I of the proposed project, the Reduced Project Size Alternative would not be expected to result in increased use of the County's park and recreational facilities. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the proposed project, there would be no impacts to recreation with the Reduced Project Size Alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, the Reduced Project Size Alternative would not have the potential to result in significant impacts to recreation. The Reduced Project Size Alternative would result in a less development than Tier II of the proposed project, which would result in less of a potential for recreational impacts. However, as with Tier II of the proposed project, the Reduced Project Size Alternative would not be expected to result in increased use of the County's park and recreational facilities. Overall, because the Reduced Project Size Alternative would not include as many residential units constructed as Tier II of the proposed project, but as with Tier II of the proposed project, no mitigation measures would be required. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the Tier II of the proposed project, there would be no impacts to recreation with the Reduced Project Size Alternative, and no mitigation measures would be required.

Transportation and Traffic

Tier I

Like Tier I of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to transportation and traffic. The Reduced Project Size Alternative would result in a similar development scenario as Tier I of the proposed project. As with Tier I of the proposed project, this alternative would most likely need to implement mitigation measures to further reduce impacts of project-generated traffic. This alternative would overall result in comparable to increased traffic generation as Tier I of the proposed project. As with the proposed project, Tier I would result in a reduction of trips. Tier I would result in 2,586 daily trips of which 176 trips would occur in the morning peak hour and 179 trips would occur in the evening peak hour. Since Tier I also involves vacating existing uses, a net reduction in trips of approximately 4,905 daily trips, 332 AM trips, and 338 PM trips would occur. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to transportation and traffic with the Reduced Project Size Alternative, it is expected that implementation of measure Traffic-1 through specified for Tier I the proposed project would be required.

Tier II

Like Tier II of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to transportation and traffic. The Reduced Project Size Alternative

would result in a smaller development scenario than Tier II the proposed project, which would result in fewer overall traffic impacts. The weekday trip generation forecast for this alternative is expected to generate less of a net increase in vehicle trips. However, this alternative would most likely need to implement mitigation measures to further reduce impacts of project-generated traffic. This alternative would overall result in fewer impacts related to increased traffic generation than Tier II of the proposed project. The Tier II component trip generation for this alternative would result in a net total of approximately 11,909 daily trips of which 745 trips would occur during the morning peak hour and 1,048 trips during the evening peak hour. The proposed project (Tiers I and II combined) would have a total net trip generation of 7,004 daily trips of which 413 trips would occur during the morning peak hour and 710 trips during the evening peak hour. This represents 64% less daily trips than the proposed project and 67% and 59% less trips during the AM and PM peak hours, respectively.

Similar to the proposed project, the Reduced Project Size Alternative would have the potential to result in significant traffic impacts. However, this alternative would adversely impact traffic to a lesser degree, based on the 67% less trip generation than the Proposed Project. No significant differences in travel patterns outside the project area would be expected between this alternative and that of the proposed project. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to transportation and traffic with the Reduced Project Size Alternative, it is expected that implementation of measures Traffic-1 through Traffic-3 specified for Tier II of the proposed project would be required.

Utilities and Service Systems

Tier I

Like Tier I of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to utilities and services systems. The Reduced Project Size Alternative would still result in substantially more development than currently exists at the project site although as with Tier I there would not be a small increase in the population. Due to the fact that the total development under this alternative is comparable to that of Tier I of the proposed project, this alternative would result in a reduction in the demand on water supply, wastewater treatment facilities, landfills and recycling requirements. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to utilities and service systems with the Reduced Project Size Alternative, it is expected that like Tier I of the proposed project, no mitigation would be required.

Tier II

Like Tier II of the proposed project, the Reduced Project Size Alternative would have the potential to result in significant impacts to utilities and services systems. The Reduced Project Size Alternative would still result in substantially more development than currently exists at the project site and would still result a small increase in the population. Therefore the Reduced Project Size Alternative would also increase demand on water supply, wastewater treatment, solid waste or other utilities within the project area. However, because the total development under this alternative is reduced compared to that of Tier II of the proposed project, this alternative would result in less demand on water supply, wastewater treatment facilities, landfills and recycling requirements. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to utilities and service systems with

the Reduced Project Size Alternative, it is expected that implementation of Measures Utiltites-1 through Utilitites-2 specified for Tier II of the proposed project would be required.

4.3 ALTERNATIVE 2: RE-OPENING THE EXISTING MACC ALTERNATIVE

4.3.1 Alternative Components

As with the proposed project, the Re-opening the existing MACC Alternative would be located on the existing campus. This alternative would restore the former outpatient and inpatient (i.e. the trauma center, emergency services, and at least 233 beds) functions of the MACC building into the existing MACC building. Re-opening of the existing MACC would not incorporate sustainable design elements. The existing MACC would be re-opened and would provide up to 250 beds, along with the inpatient services that were previously provided at the hospital. The new MACC and Ancillary buildings would not be constructed and the related tenant and site improvements as described in Section 2.0, *Project Description* of this EIR, would not be completed. This alternative would require significant structural and tenant refinements to the existing MACC. The focus of this alternative would be to obtain the licensing, funding, and adequate operational requirements (including but not limited to staff, supplies, etc.) to re-open the existing MACC. Only the existing MACC would be reused. No other buildings would be replaced, removed or reused. However, in order to provide inpatient services, the existing MACC would require significant seismic improvements in January 2013 for compliance with OSHPD requirements.

Under this alternative, it is anticipated that Tier I of the proposed project (development of the new MACC and Ancillary buildings) would not occur. Additionally, no community-based, comprehensive, or mixed use development as described in Tier II, master plan development of the proposed project would occur. There would be no new development.

4.3.2 Objectives and Feasibility

As shown in Table 4-1, *Summary of Proposed Project and Alternatives' Ability to Attain Project Objectives,* the Re-opening the Existing MACC Alternative would be capable of meeting only one of the objectives identified by the County, objective 6, to maintain the square foot of the existing: Genesis Clinic; Oasis Clinic (old); Oasis Clinic (new); Registration Building; Augustus F. Hawkins Comprehensive Mental Health Center; Inpatient Tower; Pediatric Acute Care; Medical Records and Laundry; Central Plant; Plant Management; North Support Building; South Support Building; Interns and Physicians Building; Claude Hudson Auditorium; MRI Building; and Hub Clinic Building. The existing MACC is operationally and environmentally inefficient. The County's efforts and funding would all contribute to the seismic upgrades, inpatient improvements, and operations at the existing MACC. It is anticipated that the costs and the scope requirements such as ensuring the staff, operational efficiency, and timely licensing of all of the functions would be infeasible.

4.3.3 Construction Scenario

Under the Re-opening the Existing MACC Alternative considerable construction would occur. It is anticipated that there would be a significant amount of construction and site improvements due to the required seismic improvements that would be required to provide inpatient services. The costs that would associated with these tasks and the improvements to the existing MACC would be significant.

4.3.4 Comparative Impacts

Aesthetics

Tier I

Like Tier I of the proposed project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to aesthetics. Under this alternative, it is anticipated that Tier I and the visual appearance of the proposed project area would essentially look like it does under existing conditions. This alternative would slightly reduce visual impacts as it relates to the MACC building (i.e., two less buildings would need to be constructed). The Re-opening of the Existing MACC Alternative would still result in an increase in nighttime lighting from vehicles, buildings, landscape features, and signage associated with medical, residential commercial uses under the proposed project Tier II. This alternative is considered to have slightly reduced visual impacts as compared to Tier I of the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to aesthetics with the Re-opening the Existing MACC Alternative it is expected that implementation of measure Aesthetics-1 specified for Tier I of the proposed project would be required.

Tier II

Like Tier II of the proposed project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to aesthetics. However, this alternative would reduce the visual impacts associated with the Tier II development. No Tier II development would occur. The Re-opening of the Existing MACC Alternative would still result in an increase in nighttime lighting from vehicles, buildings, landscape features, and signage associated with medical, residential commercial uses under the proposed project Tier II although they would be limited and would be comparable to impacts associated with the past operational campus. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. However, this alternative is considered to have slightly reduced visual impacts as compared to the proposed project. Since there would be potential impacts to aesthetics with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Aesthetics-1 through Aesthetics-4 specified for Tier II of the proposed project would be required.

Air Quality

Tier I

Like Tier I of the proposed project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Re-opening the Existing MACC Alternative would require less construction and less vehicle trips than the proposed project, the Re-opening the Existing MACC Alternative is considered to have lesser impacts to air quality compared with Tier I of the proposed project. Like Tier I of the proposed project, the Re-opening the Existing MACC Alternative would require only limited construction and site improvement activities. Unlike the proposed project, this alternative would not entail the vacation of existing structures or grading activities beyond the baseline conditions. The Re-opening the Existing MACC Alternative would require the use of a limited number of construction equipment and would generate vehicle trips, thus resulting in potentially significant impacts to air quality, particularly with regard to NO_x emissions. As with Tier I of the proposed project, the Re-opening

the Existing MACC Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. However, due to the fact that no grading, excavation, or major construction activities would occur beyond the existing MACC building, it is anticipated that implementation of mitigation measures would not be required. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Re-opening the Existing MACC Alternative it is expected that implementation of Measures Air-1 through Air-9 specified for Tier I the proposed project would not be required.

Tier II

Like Tier II of the proposed project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Tier II element of this alternative would not occur, the Re-opening the Existing MACC Alternative is considered to have the fewer impacts to air quality compared with Tier II of the proposed project. Unlike Tier II of the proposed project, this alternative would not entail reuse, removal, or replacement of existing structures or grading activities beyond the baseline conditions. The Re-opening the Existing MACC Alternative would require the use of construction equipment and would generate vehicle trips, although there would be less use of construction-related equipment and fewer vehicle trips, thus resulting in fewer potentially significant impacts to air quality, particularly with regard to NO_x emissions. As with Tier II of the proposed project, the Re-opening the Existing MACC Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. Due to the fact that no significant grading, excavation, or major construction activities would occur beyond the existing MACC, it is anticipated that implementation of mitigation measures would not be required. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Air-1 through Air-9 specified for Tier II of the proposed project would not be required.

Cultural Resources

Tier I

Unlike Tier II of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to cultural resources. The Re-opening the existing MACC Alternative would reduce potential impacts to cultural resources that could result from the implementation of the proposed project. Structural and tenant refinements related to the incorporation of a 500-bed hospital within the existing MACC, a historical resource, would require review for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Unlike the proposed project, this Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of historical resources would not occur. As a result, the project site would continue in its existing form with its cultural resources largely unchanged. The incorporation of structural and tenant refinements to the existing MACC, a historical resource, would require review for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Unlike Tier I of the proposed project, this

alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to cultural resources with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Cultural-1 through Cultural-5 specified for the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to cultural resources. The Re-opening the existing MACC Alternative would reduce potential impacts to cultural resources that could result from the implementation of the proposed project. Structural and tenant refinements related to the incorporation of a 500-bed hospital within the existing MACC, a historical resource, would require review for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Unlike the proposed project, this Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of historical resources would not occur. As a result, the project site would continue in its existing form with its cultural resources largely unchanged. The incorporation of structural and tenant refinements to the existing MACC, a historical resource, would require review for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to cultural resources with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Cultural-1 through Cultural-5 specified for the proposed project would not be required.

Geology and Soils

Tier I

Like Tier I of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to geology and soils. This alternative avoids most of the potential impacts to geology and soils that could result from the implementation of the proposed project. Section 3.4, *Geology and Soils*, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures, or construction of new structures and implementation of the mitigation measures would not be required. However, the anticipated seismic improvements that would be required under this alternative would be considerable and would require different mitigation than that proposed for the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to geology and soils with the Re-opening the Existing MACC Alternative it is expected that although implementation of measures Geology-1 through Geology-3 specified for the proposed project would not be required, mitigation measures would be required for this alternative.

Tier II

Like Tier II of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to geology and soils. This alternative avoids most of the potential impacts to geology and soils that could result from the implementation of the proposed

project. Section 3.4, *Geology and Soils*, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures, or construction of new structures and implementation of the mitigation measures would not be required. However, the anticipated seismic improvements that would be required under this alternative would be considerable and would require different mitigation than that proposed for the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to geology and soils with the Re-opening the Existing MACC Alternative it is expected that although implementation of measures Geology-1 through Geology-3 specified for the proposed project would not be required, mitigation measures specific to this alternative's impacts would be required.

Greenhouse Gas Emissions

Tier I

Unlike Tier I of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant construction related impacts to greenhouse gas emissions. Due to the fact that the Re-opening the Existing MACC Alternative would require less construction, less electricity consumption, and less vehicle trips than the proposed project, the Re-opening the Existing MACC Alternative is considered to have fewer impacts to GHG emissions compared with the proposed project. Unlike the proposed project, the Re-opening the Existing MACC Alternative would require only limited construction and site improvement activities. Unlike the proposed project, this alternative would not entail demolition of existing structures or major construction activities beyond the baseline conditions. The Re-opening the Existing MACC Alternative would require the use of a limited number of construction equipment, would generate vehicle trips, and would require electricity consumption, thus resulting in potentially significant impacts to GHG emissions. As with the proposed project, the Re-opening the Existing MACC Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no construction of new buildings associated with the Re-opening the Existing MACC Alternative, it is anticipated that implementation of measure GHG-1 would not be required.

Tier II

Unlike Tier II of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant construction related impacts to greenhouse gas emissions. Due to the fact that the Re-opening the Existing MACC Alternative would require less construction, less electricity consumption, and less vehicle trips than the proposed project, the Re-opening the Existing MACC Alternative is considered to have fewer impacts to GHG emissions compared with the proposed project. Unlike the proposed project, the Re-opening the Existing MACC Alternative would require only limited construction and site improvement activities. Unlike the proposed project, this alternative would not entail demolition of existing structures or major construction activities beyond the baseline conditions. The Re-opening the Existing MACC Alternative would require the use of a limited number of construction equipment, would generate vehicle trips, and would require electricity consumption, thus resulting in potentially significant impacts to GHG

emissions. As with the proposed project, the Re-opening the Existing MACC Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no construction of new buildings associated with the Re-opening the Existing MACC Alternative, it is anticipated that implementation of measure GHG-1 would not be required.

Hazards and Hazardous Materials

Tier I

Unlike the proposed project, this alternative would not have the potential to result in impacts to hazards and hazardous materials. This alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the proposed project. Unlike the proposed project, this alternative would entail no grading (excavation and fill) or the construction of new structures. However, this alternative would entail modification of the existing MACC building that might result in impacts related to hazards and hazardous materials. The implementation of the mitigation measures identified in Section 3.6 would be required. Potential operational impacts from hazards or hazardous materials would likely occur. This alternative would not result in short- or long-term impacts from hazards and hazardous materials that would be comparable to the impacts associated with the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to hazards and hazardous materials with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Hazards-1 through Hazards-5 specified for the proposed project would be required.

Tier II

Unlike Tier II of the proposed project, Tier II of the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The Re-opening the Existing MACC Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the proposed project. Unlike Tier I of the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6, Hazards and Hazardous Materials, would not be required. Potential operational impacts from hazards or hazardous materials would not occur. The Re-opening the Existing MACC Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hazards and hazardous materials with the Re-opening the Existing MACC Alternative, implementation of measures Hazards-1 through Hazards-5 specified for Tier I of the proposed project would not be required.

Hydrology and Water Quality

Tier I

Like the proposed project, this alternative would have the potential to result in impacts to hydrology and water quality. Because there are no grading or fill activities, the implementation of the mitigation measures identified in Section 3.7 to reduce impacts from pollution entering the storm drain system would not be required. However, under the proposed project, the new MACC building would be an efficient and sustainable building, however this alternative would not include development of the sustainable or efficient elements that would reduce runoff and potential water quality–related impacts. The existing MACC as it currently operates is inefficient. Like the proposed project, this alternative would require the implementation of mitigation measures; however, efforts to re-open and expand the existing MACC would be expected to result in impacts to hydrology and water quality that would be greater than the proposed project. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the Re-opening the Existing MACC Alternative it is expected that implementation of Measures Hydrology-1 through Hydrology-4, specified for the proposed project would be required. However, it is anticipated that Hazards-1 specified for Tier II of the proposed project would not be required.

Tier II

Like Tier II of the proposed project, Tier II of the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to hydrology and water quality. The Re-opening the Existing MACC Alternative avoids impacts to hydrology and water quality that could result from the implementation of the proposed project. Section 3.7 of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier II of the proposed project, the Re-opening the Existing MACC Alternative would entail no conversion of vacant land including grading, paving, and construction; however, the existing MACC is inefficient and seismic improvements to this structure would not improve the efficiency or reduce the water use of this building, nor would the improvements entail LEED or energy-efficient elements. and implementation of mitigation measures would be required. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be impacts to hydrology and water quality with the Re-opening the Existing MACC Alternative, implementation of measures Hydrology-1 through Hydrology-4 specified for Tier II of the proposed project would be required. However, it is anticipated that Hazards-1 specified for Tier II of the proposed project would not be required.

Noise

Tier I

Unlike the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to noise. Under this alternative, the construction-related noise impacts would not occur. Both Tier I and Tier II related noise impacts would be avoided. Unlike the proposed project, this alternative would not be expected to result in noise-related construction impacts. As such, this alternative would be expected to result in fewer impacts associated with construction-related noise impacts than with the proposed project. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to noise with the Re-opening the Existing MACC Alternative it

is expected that implementation of measures Noise-1 through Noise-4 specified for the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, Tier II of the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to noise. The Re-opening the Existing MACC Alternative would not entail for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Section 3.8, Noise, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier II of the proposed project, the Re-opening the Existing MACC Alternative would not result in impacts related to noise and no mitigation measures would be required. The Re-opening the Existing MACC Alternative would not result in short- or long-term impacts to noise. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to noise with the Re-opening the Existing MACC Alternative, implementation of Measures Noise-1 through Noise-4 specified for Tier II the proposed project would not be required.

Population and Housing

Tier I

Like Tier I of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to population and housing. As with Tier I of the proposed project, there would be no anticipated impacts related to population and housing with this alternative. Under this alternative, the proposed residential units would still be constructed. Under this alternative, the up to 100 residential units would still be constructed as a part of Tier II. The Re-opening of the MACC Alternative would not be expected to significantly impact the population or housing in the proposed project area. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier I of the proposed project, there would be no impacts to population and housing with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required.

Tier II

Like Tier II of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to population and housing. As with Tier II of the proposed project, there would be no anticipated impacts related to population and housing with this alternative. Under this alternative, the proposed residential units would still be constructed. Under this alternative, the up to 100 residential units would still be constructed as a part of Tier II. The Re-opening of the MACC Alternative would not be expected to significantly impact the population or housing in the proposed project area. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to population and housing with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required.

Public Services

Tier I

Like Tier I of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to public services. The Re-opening of the Existing MACC Alternative would result in similar impacts to public services as compared to the proposed project. The Re-opening of the Existing MACC Alternative would have no impacts to fire protection, police protection, parks, schools, and other public services like the proposed project. As the proposed project the residential units would be included and impacts to public services are less than significant. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, there would be no impacts to public services with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required.

Tier II

Like Tier II of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to public services. The Re-opening of the Existing MACC Alternative would result in similar impacts to public services as compared to the proposed project. The Re-opening of the Existing MACC Alternative would have no impacts to fire protection, police protection, parks, schools, and other public services like the proposed project. As the proposed project the residential units would be included and impacts to public services are less than significant. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, there would be no impacts to public services with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required.

Recreation

Tier I

Like Tier I of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to recreation. Under this alternative, the proposed residential units would still be constructed. The Re-opening the Existing MACC Alternative would still allow for the residential units to be constructed as a part of Tier II. As with Tier II of the proposed project, this alternative would not be expected to result in increased use of the County's park and recreational facilities. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to recreation with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required.

Tier II

Like Tier II of the proposed project, the Re-opening the Existing MACC Alternative would not have the potential to result in significant impacts to recreation. Under this alternative, the proposed residential units would still be constructed. The Re-opening the Existing MACC Alternative would still allow for the residential units to be constructed as a part of Tier II. As with Tier II of the proposed project, this alternative would not be expected to result in increased use of the County's park and recreational facilities. Like Tier II of the proposed project, this alternative would not result

in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to recreation with the Re-opening the Existing MACC Alternative, and no mitigation measures would be required.

Transportation and Traffic

Tier I

Like Tier I of the proposed project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to transportation and traffic. The Re-opening the Existing MACC Alternative would result in a comparable amount of trips associated within the Tier I of the proposed project. The amount of trips and impacts associated with the construction of this alternative would be comparable to those associated Tier I of the proposed project. The Re-opening the Existing MACC Alternative would overall result in impacts that are comparable to the proposed project and would require mitigation measures. This alternative would contain no new development and therefore would not generate any new trips. This alternative would generate fewer trips than the existing baseline conditions. The existing baseline trip generation includes both operational and non-operational existing uses, which includes the existing MACC building. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to transportation and traffic with the Re-opening the Existing MACC Alternative it is expected that implementation of Measures Traffic-1 specified for Tier I of the proposed project would be required.

Tier II

Like Tier II of the proposed project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to transportation and traffic. The Re-opening the Existing MACC Alternative would not result in a comparable amount of trips associated within the Tier II of the proposed project. Under this alternative, none of the development proposed under Tier II of the proposed project would be built. The amount of trips and impacts associated with this alternative would not be comparable to those associated the Tier II of the proposed project. The Re-opening the Existing MACC Alternative would overall result in impacts less than those of Tier II of the proposed project and would not require mitigation measures. This alternative would contain no new development and therefore, would not generate any new trips. This alternative would generate fewer trips than the existing baseline conditions. The existing baseline trip generation includes both operational and non-operational existing uses, which includes the existing MACC building. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to transportation and traffic with the Re-opening the Existing MACC Alternative it is expected that implementation of measures Traffic-1 through Traffic-3 specified for Tier II of the proposed project would not be required.

Utilities and Service Systems

Tier I

Unlike Tier I of the proposed project, the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to utilities and service systems. The Re-opening the Existing MACC Alternative would result in greater impacts than the existing conditions and Tier I of the proposed project. The total development under this alternative would be greater than that of Tier I of the proposed project; therefore, this alternative would result in greater demand on water

supply, wastewater treatment facilities, landfills and recycling requirements. Unlike Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to utilities and service systems with the Re-opening the Existing MACC Alternative it is expected that implementation mitigation measures would be required.

Tier II

Like Tier II of the proposed project, Tier II of the Re-opening the Existing MACC Alternative would have the potential to result in significant impacts to utilities and service systems. The Re-opening the Existing MACC Alternative avoids potential impacts to utilities and service systems that could result from the implementation of Tier II of the proposed project; however, the existing MACC is inefficient and seismic improvements to this structure would not improve the efficiency of this building, nor would the improvements entail LEED or energy-efficient elements. Although, the alternative would not entail the elements that are proposed in Tier II of the proposed project (i.e., no residential, retail, commercial uses, etc); this alternative would result in an increase in use to accommodate up to 250 inpatient beds as well as significant impacts to utilities and services due to the continued use of an inefficient building. As such, the Re-opening the Existing MACC Alternative would be expected to result in the short- and long-term construction and operation impacts. Unlike the proposed project, this alternative would entail no additional construction of buildings and would not require additional use of existing infrastructure (i.e., sewer, water, etc.). With the Re-opening the Existing MACC Alternative, mitigation measures would be required. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be impacts to utilities and service systems with the Re-opening the Existing MACC Alternative, implementation of mitigation measures including Measures Utilities-1 through Utilitites-2 specified for Tier II of the proposed project would be required.

4.4 ALTERNATIVE 3: PUBLIC TRANSPORTATION FOCUSED ALTERNATIVE

4.4.1 Alternative Components

The Public Transportation Focused Alternative would consist of both Tier I and Tier II development elements of the proposed project, as described in Section 2.0 of this EIR. Buildings would be reused, replaced, or removed and Tier II elements of the proposed project would be developed. Additionally, there would be a greater focus on enhancing the current public transportation services at the existing campus and the surrounding area. The intent of this alternative is to reduce the anticipated vehicle trips to the campus by approximately 10% more than that of the proposed project by implementing a series of transit improvement measures.

The transit improvement could potentially include a combination of one or more of the following: increase of frequency of service, improvement of connectivity in the system, coordination of transfers and other incentives for increased transit usage. The potential frequency improvement could be achieved by increasing the frequency of the Metro Green and Blue Lines and by adding more connections between campus and the metro stations. Additional bus routes including extension of Metro Rapid Service with close coordination with the Metropolitan Transportation Authority (MTA) would also be explored with this alternative. Improvement of frequency, connectivity and coordination of transfers between various transit lines operated by the Metropolitan Transportation Authority (MTA), Los Angeles Department of Transportation Downtown Area Short Hop (LADOT-DASH), Renaissance Transit System, Gardena Municipal Bus Line, Rosewood Smart Shuttle, Lynwood Trolley, Torrance Transit System, Carson Circuit System, Long Beach Transit (LBT), and the Hahn Trolley Shuttle Service would also be explored in this

alternative. The County would also investigate the potential to increase subsidies for visitors using public transportation as well as provision of universal transit passes to employees at subsidized fares. Finally, the County would seek to utilize / purchase an off-site parking lot for patients / visitors to use instead of parking on campus and to use and then be transferred (via shuttle) to/from the campus.

4.4.2 Objectives and Feasibility

As shown in Table 4-1, the Transportation Focused Alternative would be capable of meeting four of the objectives identified by the County. This alternative would meet the County objectives to maintain existing campus buildings and provide for a new MACC, Ancillary building, and site and tenant improvements. This alternative would meet the County's objectives to improve efficiency; provide a sustainable and connected campus; and to develop the campus and incorporated mixed-uses on the campus. However, increasing service frequency would not necessarily increase coverage area of the public transportation network. As discussed in the Traffic Impact Analysis (Appendix H), which was prepared for the proposed project, the existing public transportation network already serves the campus area. The existing shuttles provide door-to-door service for patrons in order to ensure that patients and visitors have access to the campus. This alternative would have significant costs related to increases in the frequency and oversight as well as provision of other improvements described earlier; however, the benefit that could potentially be obtained from these improvements would be limited in scope in relation to the costs. The existing public transportation network already serves this area with adequate coverage and frequency to meet the existing and anticipated demands. It is for these reasons that this alternative would not be feasible. Despite this fact, it is worth noting that elements of this alternative are worthy of consideration and would be incorporated into the Master Plan for the proposed project, as appropriate.

4.4.3 Construction Scenario

Under the Public Transportation Focused Alternative, both Tier I and Tier II construction and elements would occur. The construction related activities including grading and the new development including the construction of the new MACC and Ancillary buildings and tenant and site improvements as described in the Tier I element of the proposed project would occur.

The buildings specified in the proposed project would be reused, replaced, or removed as part of this alternative and there would be campus-wide (Tier II) development associated with this alternative.

4.4.4 Comparative Impacts

Aesthetics

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to aesthetics. Under the Public Transportation Focused Alternative, all of the changes proposed under the Tier I would take place and this alternative would increase nighttime light and glare above the existing levels and is therefore considered to have similar aesthetic impacts to the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential

impacts to aesthetics with the Public Transportation Focused Alternative it is expected that implementation of measures Aesthetics-1 specified for the proposed project would be required.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to aesthetics. Under the Public Transportation Focused Alternative, all of the changes proposed under Tier II would take place (introduction of cohesive architectural design elements, improved medical facilities, retail, etc.) and the visual appearance of the project site would change as described in the proposed project. As with the proposed project, this alternative would have no impacts on scenic highways; however, it would potentially result in shade and shadows because it would introduce buildings at the proposed project site. This alternative would increase nighttime light and glare above the existing levels and is therefore considered to have aesthetic impacts similar to the proposed project. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to aesthetics with the Public Transportation Focused Alternative it is expected that implementation of measures Aesthetics-1 through Aesthetics-4 specified for the proposed project would be required.

Air Quality

Tier I

Like the proposed project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Public Transportation Focused Alternative would require comparable construction and vehicle trips to the proposed project, the Public Transportation Focused Alternative is considered to have similar impacts to air quality compared with the proposed project. As with the proposed project, the Public Transportation Focused Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with the proposed project, this alternative would entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, and asphalt operations beyond the baseline conditions. The Public Transportation Focused Alternative would require grading or the use of construction equipment and mobile or stationary facilities, thus resulting in potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. As with the proposed project, the Public Transportation Focused Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. As with the proposed project, the Public Transportation Focused Alternative would result in potentially significant impacts to air quality that would result from emissions from construction equipment. However, unlike the proposed project, the Public Transportation Focused Alternative would result in a net decrease in vehicle trips compared with baseline conditions. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Public Transportation Focused Alternative it is expected that implementation of measures Air-1 through Air-9 specified for the proposed project would not be required.

Tier II

Like the proposed project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to air quality. Due to the fact that the Public Transportation Focused Alternative would require comparable construction and vehicle trips to the proposed project, the Public Transportation Focused Alternative is considered to have similar impacts to air quality compared with the proposed project. As with the proposed project, the Public Transportation Focused Alternative would involve construction, operation, and maintenance activities beyond the baseline conditions. As with the proposed project, this alternative would entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, and asphalt operations beyond the baseline conditions. The Public Transportation Focused Alternative would require grading or the use of construction equipment and mobile or stationary facilities, thus resulting in potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. As with the proposed project, the Public Transportation Focused Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. As with the proposed project, the Public Transportation Focused Alternative would result in potentially significant impacts to air quality that would result from emissions from construction equipment. However, unlike the proposed project, the Public Transportation Focused Alternative would result in a net decrease in vehicle trips compared with baseline conditions. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to air quality with the Public Transportation Focused Alternative it is expected that implementation of measures Air-1 through Air-9 specified for the proposed project would not be required.

Cultural Resources

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to cultural resources. This alternative would result in construction-related and redevelopment impacts to cultural resources that would also occur as a result of the proposed project. Like the proposed project, this alternative would entail ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would have the potential to occur. Under this alternative, the construction-related activities would result the potential to encounter paleontological resources, archeological resources, and human remains. Additionally, the buildings that were identified as being replaced, reused, or removed in the proposed project would be vacated as with Tier I of the proposed project, resulting in similar impacts to historical resources as the proposed project. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to cultural resources with the Public Transportation Focused Alternative it is expected that implementation of Measures Cultural-1 through Cultural-5 specified for the proposed project would be required.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would have the potential to result in significant impacts to cultural resources. This alternative would result in

construction-related and redevelopment impacts to cultural resources that would also occur as a result of the proposed project. Like the proposed project, this alternative would entail ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would have the potential to occur. Under this alternative, the construction-related activities would result the potential to encounter paleontological resources, archeological resources, and human remains. Additionally, the buildings that were identified as being replaced, reused, or removed in the proposed project would be reused, replaced, or removed as with Tier II of the proposed project, resulting in similar impacts to historical resources as the proposed project. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to cultural resources with the Public Transportation Focused Alternative it is expected that implementation of measures Cultural-1 through Cultural-5 specified for the proposed project would be required.

Geology and Soils

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to geology and soils. This alternative would potentially have impacts to geology and soils that are comparable to those that could result from the implementation of Tier I of the proposed project. Geology and soils related impacts would include short- and long-term construction and operation impacts that would occur as a result of the proposed project. Like the proposed project, this alternative would entail grading (excavation and fill), and construction of new structures and implementation of the mitigation measures would be required. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to geology and soils with the Public Transportation Focused Alternative it is expected that implementation of measures Geology-1 through Geology-3 specified for Tier I of the proposed project would be required.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to geology and soils. This alternative would potentially have impacts to geology and soils that are comparable to those that could result from the implementation of Tier II of the proposed project. Geology and soils–related impacts would include short- and long-term construction and operation impacts that would occur as a result of the proposed project. Like the proposed project, this alternative would entail grading (excavation and fill), and construction of new structures and implementation of the mitigation measures would be required. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to geology and soils with the Public Transportation Focused Alternative it is expected that implementation of measures Geology-1 through Geology-3 specified for Tier II of the proposed project would be required.

Greenhouse Gas Emissions

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to greenhouse gas emissions. Due to the fact that the Public Transportation Focused Alternative would require construction, electricity consumption,

and vehicle trips similar to the proposed project, the Public Transportation Focused Alternative is considered to have impacts to GHG emissions that are comparable to the proposed project. This alternative would entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, and electricity consumption beyond the baseline conditions. As with the proposed project, the Public Transportation Focused Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As with the proposed project, the Public Transportation Focused Alternative would result in potentially significant impacts to GHG emissions that would result from emissions from construction equipment. Since there would be potential construction impacts to GHG emissions with the Public Transportation Focused Alternative, it is anticipated that implementation of Measure GHG-1 would be required. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. However, unlike the proposed project, the Public Transportation Focused Alternative would result in a net decrease in vehicle trips compared with baseline conditions. Therefore, operational impacts of the Public Transportation Focused Alternative would be anticipated to be below the level of significance.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to greenhouse gas emissions. Due to the fact that the Public Transportation Focused Alternative would require construction, electricity consumption, and vehicle trips similar to the proposed project, the Public Transportation Focused Alternative is considered to have impacts to GHG emissions that are comparable to the proposed project. This alternative would entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, and electricity consumption beyond the baseline conditions. As with the proposed project, the Public Transportation Focused Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As with the proposed project, the Public Transportation Focused Alternative would result in potentially significant impacts to GHG emissions that would result from emissions from construction equipment. Since there would be potential construction impacts to GHG emissions with the Public Transportation Focused Alternative, it is anticipated that implementation of Measure GHG-1 would be required. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. However, unlike the proposed project, the Public Transportation Focused Alternative would result in a net decrease in vehicle trips compared with baseline conditions. Therefore, operational impacts of the Public Transportation Focused Alternative would be anticipated to be below the level of significance.

Hazards and Hazardous Materials

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hazards and hazardous materials. This alternative would have comparable impacts to hazards and hazardous materials than what would

result from the implementation of the proposed project. Like the proposed project, this alternative could potentially entail construction and operational elements that might result in impacts related to hazards and hazardous materials; the implementation of the mitigation measures would potentially be required. Potential operational impacts from hazards or hazardous materials would be expected to occur. This alternative would result in impacts from hazards and hazardous materials. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hazards and hazardous materials with the Public Transportation Focused Alternative it is expected that implementation of measures Hazards-1 through Hazards-5 specified for the proposed project would be required.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hazards and hazardous materials. This alternative would have comparable impacts to hazards and hazardous materials than what would result from the implementation of the proposed project. Like the proposed project, this alternative could potentially entail construction and operational elements that might result in impacts related to hazards and hazardous materials; the implementation of the mitigation measures would potentially be required. Potential operational impacts from hazards or hazardous materials would be expected to occur. This alternative would result in impacts from hazards and hazardous materials. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hazards and hazardous materials with the Public Transportation Focused Alternative it is expected that implementation of measures Hazards-1 through Hazards-5 specified for the proposed project would be required.

Hydrology and Water Quality

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hydrology and water quality. The Public Transportation Focused Alternative would require construction that is comparable to the proposed project and would therefore result in potential impacts to hydrology and water quality that could result from the implementation of the proposed project. Because Tier I components would be constructed, the potential impact to surface water quality from erosion and runoff into storm drain systems would be comparable to the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the Public Transportation Focused Alternative it is expected that implementation of Measures Hydrology-1 through Hydrology-3, and Hazards-1 specified for the proposed project would be required.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to hydrology and water quality. The Public Transportation Focused Alternative would require construction that is comparable to the proposed project and would therefore result in potential impacts to hydrology and water quality that could result from the implementation of the proposed project. Because Tier II components would be constructed, the potential impact to surface water quality from erosion and runoff into storm drain systems would be comparable to the proposed project. Like Tier II of the proposed project, this

alternative would not result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the Public Transportation Focused Alternative it is expected that implementation of measures Hydrology-1 through Hydrology-4, and Hazards-1 specified for the proposed project would be required.

Noise

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to noise. Construction related noise impacts that would be comparable to the proposed project. This alternative would have significant noise related impacts that would result from construction related activities. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to noise with the Public Transportation Focused Alternative it is expected that implementation of Measures Noise-1 through Noise-4 specified for the proposed project would be required.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would be expected to result in potential significant impacts to noise. Construction related noise impacts that would be comparable to the proposed project. This alternative would have significant noise related impacts that would result from construction related activities. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to noise with the Public Transportation Focused Alternative it is expected that implementation of measures Noise-1 through Noise-4 specified for the proposed project would be required.

Population and Housing

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to population and housing. Like Tier I of the proposed project this alternative would not contribute to or result in population growth beyond the planned growth for the area and as such would not result in impacts related to population and housing. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, there would be no impacts to population and housing with the Public Transportation Focused Alternative, and no mitigation measures would be required.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to population and housing. As with the proposed project, residential units would be constructed. Like Tier II of the proposed project this alternative would not contribute to or result in population growth beyond the planned growth for the area and as such would not result in impacts related to population and housing. This alternative would contribute to regional housing and employment goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). Like Tier II of the proposed project, this alternative would not result in

cumulatively considerable impacts. As with the proposed project, there would be no impacts to population and housing with the Public Transportation Focused Alternative, and no mitigation measures would be required.

Public Services

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts public services. Like the proposed project, the Public Transportation Focused Alternative would not result in impacts to public services. This alternative would include the development of Tier I. As with the proposed project, the Public Transportation Focused Alternative would not result in significant impacts to public services. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, there would be no impacts to public services with the Public Transportation Focused Alternative, and no mitigation measures would be required.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts public services. Like the proposed project, the Public Transportation Focused Alternative would not result in impacts to public services. This alternative would include the development of Tier II. Tier II requires the development of residential units. Therefore, the residential units would be included in this alternative. However, as with the proposed project, the Public Transportation Focused Alternative would not result in significant impacts to public services. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, there would be no impacts to public services with the Public Transportation Focused Alternative, and no mitigation measures would be required.

Recreation

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to recreation. Under the Public Transportation Focused Alternative, Tier I building components would be constructed but they would not contribute to or result in significant impacts. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. This alternative would be comparable to the proposed project. As with the proposed project, there would be no impacts to recreation with the Public Transportation Focused Alternative, and no mitigation measures would be required.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would not have the potential to result in significant impacts to recreation. Under the Public Transportation Focused Alternative, Tier II building and development components would be constructed but they would not contribute to or result in significant impacts. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. This alternative would be comparable to

the proposed project. As with the proposed project, there would be no impacts to recreation with the Public Transportation Focused Alternative, and no mitigation measures would be required.

Transportation and Traffic

Tier I

Unlike the proposed project, the Public Transportation Focused Alternative would not have the potential to result in impacts to transportation and traffic. As proposed, the Public Transportation Focused Alternative would add additional routes and shuttles to the existing network utilize / purchase an off-site lot to transfer patients / visitors, and increase subsidies for visitors using public transportation. As with the proposed project, the Public Transportation Focused Alternative would involve some construction, operation, and maintenance activities beyond the baseline conditions. However, all the structures proposed under the proposed project would be built. Due to the fact that the Public Transportation Focused Alternative would offset the transportation related impacts, this alternative would result in significantly less vehicle trips than the proposed project, thus, the Public Transportation Focused Alternative is considered to have fewer impacts to traffic and transportation compared with the proposed project; however, construction-related impacts associated with Tier I of the proposed project would still occur. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to transportation and traffic with the Public Transportation Focused Alternative it is expected that implementation of measures Traffic-1 through Traffic-3 specified for the proposed project would not be required.

Tier II

Unlike the proposed project, the Public Transportation Focused Alternative would not have the potential to result in impacts to transportation and traffic. As proposed, the Public Transportation Focused Alternative would add additional routes and shuttles to the existing network utilize / purchase an off-site lot to transfer patients / visitors, and increase subsidies for visitors using public transportation. As with the proposed project, the Public Transportation Focused Alternative would involve some construction, operation, and maintenance activities beyond the baseline conditions. However, all the structures proposed under the proposed project would be built. Due to the fact that the Public Transportation Focused Alternative would offset the transportation related impacts, this alternative would result in significantly less vehicle trips than the proposed project, thus, the Public Transportation Focused Alternative is considered to have fewer impacts to traffic and transportation compared with the proposed project.

Under this alternative, the proposed project (Tiers I and II combined) would have a total net trip generation of 17,709 daily trips of which 1,116 trips would occur during the morning peak hour and 1,578 trips during the evening peak hour. This represents 10% less daily, morning, and evening peak hour trips than the proposed project.

Similar to Tier II of the proposed project, this alternative would have the potential to result in significant traffic impacts. However, there would be up to 10% less in trip generation, than the proposed project. No significant differences in travel patterns outside the project area would be expected between this alternative and the proposed project. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to transportation and traffic with the Public Transportation Focused Alternative it

is expected that implementation of measures Traffic-1 through Traffic-3 specified for the proposed project would not be required.

Utilities and Service Systems

Tier I

Like Tier I of the proposed project, the Public Transportation Focused Alternative would not be expected to result in impacts to utilities and service systems. Under this alternative scenario, the components of Tier I would be constructed as discussed in the Section 3.13. The Public Transportation Focused Alternative results in impacts on utilities and service systems that are similar to the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively significant impacts. As with Tier I of the proposed project, it is anticipated that no mitigation measures would be required.

Tier II

Like Tier II of the proposed project, the Public Transportation Focused Alternative would be expected to result in impacts to utilities and service systems. Under this alternative scenario, the components of Tier II would be constructed (i.e., residential, commercial, medical space, etc.), therefore, there would be a potentially significant increase in the demand on water supply, wastewater treatment, solid waste, or other utilities within the project area and would occur. The Public Transportation Focused Alternative results in impacts on utilities and service systems that are similar to the proposed project. Like Tier II of the proposed project, this alternative would not result in cumulatively significant impacts. However, since there would be potential impacts to utilities and service systems with the Public Transportation Focused Alternative it is expected that implementation of measures Utilities-1 through Utilities-2 specified for the proposed project would not be required.

4.5 ALTERNATIVE 4: 500 BEDS (IN TIER I) ALTERNATIVE

4.5.1 Alternative Components

Alternative 4, the 500 Beds (in Tier I) Alternative, would entail the development and operation of a 500-bed hospital. This alternative would be located on the existing campus. The focus of this alternative would be ensuring that there is a combination of up to 500-bed facility and limited outpatient services on the campus. Tier I would consist of the development of a 500 bed hospital that would occupy the existing MACC. The existing MACC would provide up to 500 inpatient beds along with the inpatient services that were previously provided at the hospital. However, in order to provide inpatient services, the existing MACC would require significant seismic improvements in January 2013 for compliance with OSHPD requirements.

Similar to Alternative 2, Re-opening the existing MACC Alternative, this alternative would place a limited amount of the former outpatient and inpatient (i.e. the trauma center, emergency services, and up to 500 beds) functions of the MACC building into the existing MACC building. The existing MACC would not incorporate sustainable design elements. The new MACC and Ancillary buildings would not be constructed and the related tenant and site improvements as described in Section 2.0 of this EIR, would not be completed. This alternative would entail some structural and tenant refinements to the existing MACC. The focus of this alternative would be to obtain the

licensing, funding, and adequate operational requirements (including but not limited to staff, supplies, etc.) to re-open the existing MACC.

Under this alternative, neither Tier I nor Tier II of the proposed project would be constructed. It is anticipated that no LEED, sustainable design, community-based, comprehensive, or mixed use development as described in Tier I and Tier II of the proposed project would occur. There would be no new development.

4.5.2 Objectives and Feasibility

As shown in Table 4-1, Alternative 4, 500 Beds (in Tier I) Alternative would be capable of meeting one of the objectives identified by the County. This alternative would meet objective 6 to maintain the existing 2,100-square-foot Genesis Clinic; 2,580-square-foot Oasis Clinic (old); 1,850-square-foot Oasis Clinic (new); 10,950-square-foot Registration Building; 226,818-square-foot Augustus F. Hawkins Comprehensive Mental Health Center; 187,676-square-foot Inpatient Tower; 7,878-square-foot Pediatric Acute Care; 26,355-square-foot Medical Records and Laundry; 24,103-square-foot Central Plant; 15,648-square-foot Plant Management; 52,276-square-foot North Support Building; 34,762-square-foot South Support Building; 124,391-square-foot Interns and Physicians Building; 3,922-square-foot Claude Hudson Auditorium; 1,100-square-foot MRI Building; and 12,265-square-foot Hub Clinic Building.

However, this alternative would not meet any of the other County alternatives. The costs seismic upgrades, inpatient improvements, and operational requirements associated with opening a 500 bed hospital without addressing the efficiency concerns and other issues at the existing MACC that would be evaluated through a campus-wide plan would make this alternative infeasible.

4.5.3 Construction Scenario

Under Alternative 4, extensive construction-related improvements would occur. It is anticipated that there would be a significant amount of construction that would occur for the seismic improvements that would be required to provide inpatient services. The costs that would associated with these tasks and the improvements to the existing MACC would be significant.

4.5.4 Comparative Impacts

Aesthetics

Tier I

Like Tier I of the proposed project, the 500 Beds (in Tier I) Alternative would have the potential to result in impacts to aesthetics. This alternative would introduce additional uses at the project site; however, none of the Tier I or Tier II components would be constructed. Given that the proposed 500 Beds Alternative would occur the former MACC building, impacts to visual resources would be similar to the No Project Alternative. Therefore, this alternative would not have effects on scenic vistas, would result in fewer shadow impacts, and would have fewer impacts related to nighttime light and glare than the proposed project even though it would increase nighttime light and glare above the existing levels (reuse of the former MACC building). The 500 Beds Alternative would have fewer impacts on aesthetics than the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. However, since there would be

potential impacts to aesthetics with the 500 Beds Alternative it is expected that implementation of measure Aesthetics-1 specified for the proposed project would be required.

Tier II

Like Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would have the potential to result in significant impacts to aesthetics. Under the 500 Beds (in Tier I) Alternative, potential aesthetic changes relating to the replacement of existing site features would not occur. This alternative would not result in the more intensive development or the increase in nighttime lighting from vehicles, buildings, landscape features, and signage associated with commercial uses under the proposed project. As a result, the project site would continue in its existing form with its visual and aesthetic character unchanged. Even though the aesthetic changes resulting from the proposed project would not be considered significant impacts, the 500 Beds (in Tier I) Alternative's impacts to aesthetics would be less because no change, such as increased nighttime lighting, would occur. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. However, since there would be impacts to aesthetics with the 500 Beds (in Tier I) Alternative, implementation of measures Aesthetics-1 through Aesthetics-4 specified for Tier II of the proposed project would be required.

Air Quality

Tier I

Unlike the proposed project, the 500 Bed Alternative would not have the potential to result in impacts to air quality. Due to the fact that the 500 Beds Alternative would require less construction and less vehicle trips than the proposed project, the 500 Beds Alternative is considered to have lesser impacts to air quality compared with the proposed project. Unlike the proposed project, the 500 Beds Alternative would require only limited construction and site improvement activities. Unlike the proposed project, this alternative would not entail demolition of existing structures or grading activities beyond the baseline conditions. The 500 Beds Alternative would require the use of a limited number of construction equipment and would generate vehicle trips, thus resulting in potentially significant impacts to air quality, particularly with regard to NO_x emissions. As with the proposed project, the 500 Beds Alternative would have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. However, due to the fact that no grading, excavation, or major construction activities would occur, it is anticipated that implementation of mitigation measures would not be required. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to air quality with the 500 Beds Alternative it is expected that implementation of measures Air-1 through Air-9 specified for the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to ambient air quality. The 500 Beds (in Tier I) Alternative would not involve as considerable an amount of construction activities beyond the baseline conditions. Unlike the proposed project, this alternative would not entail demolition of existing structures, soil removal, delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, or asphalt operations beyond the baseline conditions. The 500 Beds (in Tier I) Alternative would not require grading or the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of volatile organic compounds (VOCs). The 500 Beds (in Tier I) Alternative would not have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Implementation of Tier II the proposed project would be expected to result in cumulative construction-related impacts and impacts during operation that would remain above the level of significance with the incorporation of mitigation measures. Unlike Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would avoid potential significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to ambient air quality with the 500 Beds (in Tier I) Alternative, implementation of measures Air-1 through Air-9 would not be required.

Cultural Resources

Tier I

Unlike the proposed project, the 500 Bed Alternative would not have the potential to result in impacts to cultural resources. The 500 Beds (in Tier I) Alternative would lessen potential impacts to cultural resources that could result from the implementation of the proposed project. Unlike the proposed project, this alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of historical resources would not occur. As a result, the project site would continue in its existing form with its cultural resources largely unchanged. Structural and tenant refinements related to the incorporation of a 500-bed hospital within the existing MACC, a historical resource, would require review for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to cultural resources with the 500 Beds Alternative it is expected that implementation of measures Cultural-1 through Cultural-5 specified for the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to cultural resources. The 500 Beds (in Tier I) Alternative would avoid the construction-related and redevelopment impacts to cultural resources that would

occur as a result of the proposed project. Unlike Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would not occur. As a result, the project site would continue in its existing form with its cultural resources unchanged. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to cultural resources with the 500 Beds (in Tier I) Alternative, implementation of measures Cultural-1 through Cultural-5 specified for Tier II of the proposed project would not be required.

Geology and Soils

Tier I

Unlike the proposed project, the 500 Bed Alternative would not have the potential to result in impacts to geology and soils. This alternative avoids potential impacts to geology and soils that could result from the implementation of the proposed project. Unlike the proposed project, this alternative would entail no grading (excavation and fill), modification of or construction of new structures although the existing MACC would require significant seismic improvements and modification and implementation of the mitigation measures would be required. However, the anticipated seismic improvements that would be required under this alternative would be considerable and would require different mitigation than that proposed for the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Although the implementation of measures Geology-1 through Geology-3 specified for Tier I of the proposed project would not be required, other mitigation measure would be required for this alternative.

Tier II

Unlike Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to geology and soils. The 500 Beds (in Tier I) Alternative avoids potential impacts to geology and soils that could result from the implementation of the proposed project. This alternative would avoid short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier II of the proposed project, this alternative would entail no grading (excavation and fill), modification of or construction of new structures although the existing MACC would require significant seismic improvements and modification and implementation of the mitigation measures would be required. However, the anticipated seismic improvements that would be required under this alternative would be considerable and would require different mitigation than that proposed for the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Although the implementation of measures Geology-1 through Geology-3 specified for Tier II of the proposed project would not be required, other mitigation measure would be required for this alternative.

Greenhouse Gas Emissions

Tier I

Unlike the proposed project, the 500 Bed Alternative would not have the potential to result in impacts to greenhouse gas emissions. Due to the fact that the 500 Beds (in Tier I) Alternative would require less construction, less electricity consumption, and less vehicle trips than the proposed

project, the 500 Beds Alternative is considered to have lesser impacts to GHG emissions compared with the proposed project. Unlike the proposed project, the 500 Beds Alternative would require only limited construction and site improvement activities. Unlike the proposed project, this alternative would not entail demolition of existing structures or major construction activities beyond the baseline conditions. The 500 Beds Alternative would require the use of a limited number of construction equipment, would generate vehicle trips, and would require electricity consumption, thus resulting in potentially significant impacts to GHG emissions. As with the proposed project, the 500 Beds Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Since there would be no construction of new buildings associated with the 500 Beds (in Tier I) Alternative, it is anticipated that implementation of mitigation measures would not be required. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to greenhouse gas emissions with the 500 Beds Alternative it is expected that implementation of measure GHG-1 specified for the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to GHG emissions. The 500 Beds (in Tier I) Alternative would involve construction, operation, improvements and maintenance activities to the existing MACC beyond the baseline conditions although this development would not be as significant as with Tier II of the proposed project. Unlike Tier II of the proposed project, this alternative would not entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, or electricity consumption beyond the baseline conditions. The 500 Beds (in Tier I) Alternative would not require the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to GHG emissions. Unlike Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would not have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Potential GHG emission impacts associated with construction and operation of Tier II would remain as significant and unavoidable even with the incorporation of mitigation measures. Unlike Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would avoid potential significant impacts to GHG emissions that would result from emissions from construction equipment, electricity consumption, and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to GHG emissions with the 500 Beds (in Tier I) Alternative, implementation of measure GHG-1 would not be required.

Hazards and Hazardous Materials

Tier I

Unlike the proposed project, this alternative would not have the potential to result in impacts to hazards and hazardous materials. This alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the proposed project. Unlike the proposed project, this alternative would entail no grading (excavation and fill) or the construction

of new structures. However, this alternative would entail modification of the existing MACC building that might result in impacts related to hazards and hazardous materials. The implementation of the mitigation measures identified in Section 3.6 would be required. Potential operational impacts from hazards or hazardous materials would likely occur. This alternative would not result in short- or long-term impacts from hazards and hazardous materials that would be comparable to the impacts associated with the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to hazards and hazardous materials with the 500 Beds Alternative it is expected that implementation of measures Hazards-1 through Hazards-5 specified for the proposed project would be required.

Tier II

Unlike Tier II of the proposed project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The 500 Beds (in Tier I) Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the proposed project. Unlike Tier I of the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6 would not be required. Potential operational impacts from hazards or hazardous materials would not occur. The 500 Beds (in Tier I) Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hazards and hazardous materials with the 500 Beds (in Tier I) Alternative, implementation of measures Hazards-1 through Hazards-5 specified for Tier I of the proposed project would not be required.

Hydrology and Water Quality

Tier I

Like the proposed project, this alternative would have the potential to result in impacts to hydrology and water quality. Because there are no grading or fill activities, the implementation of the mitigation measures identified in Section 3.7 to reduce impacts from pollution entering the storm drain system would not be required. However, under the proposed project, the new MACC building would be an efficient and sustainable building, however this alternative would not include development of the sustainable or efficient elements that would reduce runoff and potential water quality related impacts. The existing MACC as it currently operates is inefficient. Like the proposed project, this alternative would require the implementation of mitigation measures; however, efforts to re-open and expand the existing MACC would be expected to result in impacts to hydrology and water quality that would be greater than the proposed project. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to hydrology and water quality with the 500 Beds Alternative it is expected that implementation of measures Hydrology-1 through Hydrology-4, specified for the proposed project would be required. However, it is anticipated that Hazards-1 specified for Tier II of the proposed project would not be required.

Tier II

Like Tier II of the proposed project, Tier II of the 500 Beds (in Tier I) Alternative would have the potential to result in significant impacts to hydrology and water quality. The 500 Beds (in Tier I) Alternative avoids impacts to hydrology and water quality that could result from the implementation of the proposed project. Section 3.7, Hydrology and Water Quality, of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would entail no conversion of vacant land including grading, paving, and construction; however, the existing MACC is inefficient and seismic improvements to this structure would not improve the efficiency or reduce the water use of this building, nor would the improvements entail LEED or energy efficient elements and implementation of the mitigation measures would be required. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be impacts to hydrology and water quality with the 500 Beds (in Tier I) Alternative, implementation of measures Hydrology-1 through Hydrology-4 specified for Tier II of the proposed project would be required. However, it is anticipated that Hazards-1 specified for Tier II of the proposed project would not be required.

Noise

Tier I

Unlike the proposed project, the 500 Beds Alternative would not have the potential to result in significant impacts to noise. Under this alternative, the construction related noise impacts would not occur. Both Tier I and Tier II related noise impacts would be avoided. Unlike the proposed project, this alternative would not be expected to result in noise related construction impacts. As such, this alternative would be expected to result in fewer impacts associated with construction related noise impacts than with the proposed project. Unlike Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no potential impacts to noise with the 500 Beds Alternative it is expected that implementation of measures Noise-1 through Noise-4 specified for the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to noise. The 500 Beds (in Tier I) Alternative would not entail for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Section 3.8 of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would not result in impacts related to noise and no mitigation measures would be required. The 500 Beds (in Tier I) Alternative would not result in short- or long-term impacts to noise. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to noise with the 500 Beds (in Tier I) Alternative, implementation of measures Noise-1 through Noise-4 specified for Tier II the proposed project would not be required.

Population and Housing

Tier I

Like the proposed project, the 500 Beds Alternative would not have the potential to result in significant impacts to population and housing. Like the proposed project, this alternative would not be expected to result in impacts related to population and housing. Unlike the proposed project, his alternative would not include Tier I or Tier II elements and would not include housing. This alternative it would not contribute to regional housing and employment goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, there would be no impacts to population and housing with the 500 Beds Alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to population and housing. The 500 Beds (in Tier I) Alternative would not assist in meeting regional housing and employment goals. Under the 500 Beds (in Tier I) Alternative, potential changes related to population and housing would not occur. This alternative would not result in any residential development or more intensive development associated with the medical, commercial or retail uses under the proposed project. Even though potential impacts resulting from Tier II of the proposed project would not be considered significant, the 500 Beds (in Tier I) Alternative's impacts to population and housing would be less than the proposed project because no change, such as the 100-unit residential component, would be implemented. However, the 500 Beds (in Tier I) Alternative would not contribute to the regional housing goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to population and housing with the 500 Beds (in Tier I) Alternative, and no mitigation measures would be required.

Public Services

Tier I

Like the proposed project, the 500 Beds Alternative would not have the potential to result in significant impacts to public services. As with the proposed project, the 500 Beds Alternative would not result in impacts related to public services. This alternative would not require the development of residential units. Unlike the proposed project, under this alternative, there would be no Tier I or Tier II development. There would not be an increase in the need for additional fire protection, police protection, parks, schools, and other public services, like the proposed project. This alternative, however, would not contribute to regional housing and employment goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). However, like the proposed project, this alternative would not be expected to result in significant impacts related to public services. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, there would be no impacts to public services with the 500 Beds Alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to public services. The 500 Beds (in Tier I) Alternative would not result in the need for additional fire protection, police protection, schools, parks, and other public services. Section 3.10, Public Services, of this EIR provides a discussion of the potential impact to public services related to Tier II of the proposed project. Like Tier II of the proposed project, the 500 Beds (in Tier I) Alternative would not create a significant net increase in public services and would require the implementation of the mitigation measures. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to public services with the 500 Beds (in Tier I) Alternative, and no mitigation measures would be required.

Recreation

Tier I

Like the proposed project, the 500 Beds Alternative would not have the potential to result in significant impacts to recreation. Under the 500 Beds Alternative, the Tier I and Tier II building components would not be constructed. The 500 Beds Alternative would result in no residential units built. Like the proposed project, this alternative would not be expected to result in impacts related to recreation. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, there would be no impacts to recreation with the 500 Beds Alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to recreation. The 500 Beds (in Tier I) Alternative would not result in impacts to parks and recreational facilities. The 500 Beds (in Tier I) Alternative would also not create an additional demand for the County's parks. Tier II of the proposed project would not result in significant impacts to existing parks or recreational facilities given the limited number of residential units proposed under Tier II and the availability and location of existing recreational facilities. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to recreation with the 500 Beds (in Tier I) Alternative, and no mitigation measures would be required.

Transportation and Traffic

Tier I

Unlike the proposed project, the 500 Bed Alternative would not have the potential to result in significant impacts to transportation and traffic. The 500 Beds Alternative would result in a smaller development scenario than that proposed development components under Tier I and Tier II of the proposed project. The total development under this alternative would be significantly less than that of the proposed project and would generate a substantial amount less of traffic trip generation given the reduced developed. This alternative would contain no new development and therefore would not generate any new trips. This alternative would generate fewer trips than the existing baseline conditions. The existing baseline trip generation includes both operational and non-

operational existing uses, which includes the existing MACC building. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would not be potential impacts to transportation and traffic with the 500 Beds Alternative it is expected that implementation of measures Traffic-1 through Traffic-3 specified for the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, Tier II of the 500 Beds (in Tier I) Alternative would not have the potential to result in significant impacts to transportation and traffic. The 500 Beds (in Tier I) Alternative avoids potential impacts to transportation and traffic that could result from the implementation of Tier II of the proposed project. The 500 Beds (in Tier I) Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the proposed project. Unlike the Tier II of proposed project, this alternative would create no additional transportation or circulation components and implementation of the mitigation measures would not be required. This alternative would contain no new development and therefore, would not generate any new trips. This alternative would generate fewer trips than the existing baseline conditions. The existing baseline trip generation includes both operational and non-operational existing uses, which includes the existing MACC building. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to transportation and traffic with the 500 Beds (in Tier I) Alternative, implementation of measures Traffic-1 through Traffic-3 specified for Tier II of the proposed project would not be required.

Utilities and Service Systems

Tier I

Unlike Tier I of the proposed project, the 500 Beds Alternative would have the potential to result in significant impacts to utilities and service systems. The 500 Beds Alternative would result in greater impacts than the existing conditions and Tier I of the proposed project. The total development under this alternative would be greater than that of Tier I of the proposed project; therefore, this alternative would result in greater demand on water supply, wastewater treatment facilities, landfills and recycling requirements. Unlike Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be potential impacts to utilities and service systems with the 500 Beds Alternative it is expected that implementation mitigation measures would be required.

Tier II

Like Tier II of the proposed project, Tier II of the 500 Beds (in Tier I) Alternative would have the potential to result in significant impacts to utilities and service systems. The 500 Beds (in Tier I) Alternative avoids potential impacts to utilities and service systems that could result from the implementation of Tier II of the proposed project; however, the existing MACC is inefficient and seismic improvements to this structure would not improve the efficiency of this building, nor would the improvements entail LEED or energy-efficient elements. Although, the alternative would not entail the elements that are proposed in Tier II of the proposed project (i.e., no residential, retail, commercial uses, etc); this alternative would result in an increase in use to accommodate 500 inpatient beds as well as significant impacts to utilities and services due to the continued use of an inefficient building. As such, the 500 Beds (in Tier I) Alternative would be expected to result

in the short- and long-term construction and operation impacts. Unlike the proposed project, this alternative would entail no additional construction of buildings and would not require additional use of existing infrastructure (i.e., sewer, water, etc.). With the 500 Beds (in Tier I) Alternative, mitigation measures would be required. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be impacts to utilities and service systems with the 500 Beds (in Tier I) Alternative, implementation of mitigation measures including measures Utilities-1 through Utilitites-2 specified for Tier II of the proposed project would be required.

4.6 ALTERNATIVE 5: NO TIER II ALTERNATIVE

4.6.1 Alternative Components

Alternative 5, the No Tier II Alternative, would entail the development of Tier I of the proposed project as identified in Section 2.0 of this EIR. Alternative 5 would be located on the existing campus. This alternative would focus on the development of two new buildings (the new MACC and the Ancillary Building) tenant improvements in existing buildings, site improvements, and potential relocation of the MRI Building on the tech dock behind the new MACC.

This alternative would not entail the campus-wide Master Plan development described in Tier II of the proposed project. There would not be any future mixed-use campus support development that would provide additional health services necessary to address the needs of the community. In addition, this alternative would not include the potential to build-out approximately 1,814,696 square feet of development on the proposed project site with mixed uses including medical office, commercial, retail, office space, recreation, residential units, and other development in support of the campus. Also, the existing MACC building, Emergency Room, Storage Building, and Cooling Towers would be vacated but would not be reused, replaced, or removed as a part of this alternative.

Under this alternative, it is anticipated that no community-based, comprehensive, or mixed-use development as described in Tier II Master Plan development of the proposed project would occur. There would be no Tier II development.

4.5.2 Objectives and Feasibility

As shown in Table 4-1, Alternative 5, No Tier II Alternative would be capable of meeting all Tier I objectives identified by the County, but would not meet any of the Tier II objectives. The costs and operational requirements associated with Alternative 5 are feasible as they are within the scope of the County's current plans for the hospital campus. Alternative 5 would not meet the campus-wide objectives, and the improvements and development would occur but the shifts would make this alternative infeasible.

4.5.3 Construction Scenario

Under Alternative 5, the construction scenario for Tier I would occur as described in Section 2.0 of this EIR. The impacts associated with Tier I of the proposed project would be anticipated to occur under this alternative.

4.5.4 Comparative Impacts

Aesthetics

Tier I

Like Tier I of the proposed project, the No Tier II Alternative would have the potential to result in impacts to aesthetics. This alternative would introduce additional uses at the proposed project site through the construction of the Tier I component. The impacts to visual resources would be comparable to those discussed for Tier I in Section 3.1, Aesthetic Resources, of this EIR. Even though the No Tier II Alternative would increase nighttime light and glare above the existing levels by creating new sources of light and glare, the alternative would affect scenic vistas, would result in fewer shadow impacts, and would have fewer impacts related to nighttime light and glare than the proposed project would have. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. The No Tier II Alternative would have fewer impacts to aesthetics than the proposed project would have. Measure Aesthetics-1 specified for Tier I of the proposed project would be required.

Tier II

Unlike Tier II of the proposed project, the No Tier II Alternative would not result in impacts to aesthetics. Tier II of the proposed project would not be implemented. Therefore, the No Tier II Alternative would avoid the impacts associated with Tier II of the proposed project. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be not be potential for Tier II impacts to aesthetics with this alternative, no mitigation specified for Tier II of the proposed project would be required.

Air Quality

Tier I

Like Tier I of the proposed project, the No Tier II Alternative would have the potential to result in impacts to air quality. As with the proposed project, the No Tier II Alternative would require the use of a limited number of construction equipment and would generate vehicle trips, thus resulting in potentially significant impacts to air quality, particularly with regard to NO_x emissions. As with the proposed project, the No Tier II Alternative would have the potential to conflict with the Air Quality Management Plan, violate existing air quality standards, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial pollutant concentrations. The grading, excavation, and construction activities would be reduced. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Tier I impacts and mitigation measures as described in Section 3.2, *Air Quality*, of this EIR would be comparable to mitigation measures for the proposed project. Measures Air-1 through Air-9 specified for Tier I of the proposed project would be required.

Tier II

Unlike Tier II of the proposed project, the No Tier II Alternative would not have the potential to result in significant impacts to ambient air quality. The No Tier II Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike the proposed project, this alternative would not entail demolition of existing structures, soil removal,

delivery and hauling of construction materials and equipment, fuel combustion by on-site construction equipment, construction worker commute trips, application of architectural coatings, or asphalt operations beyond the baseline conditions. The No Tier II Alternative would not require grading or the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to air quality from fugitive dust emissions, NO_x emissions, or the possible release of VOCs. The No Tier II Alternative would not have the potential to conflict with the Air Quality Management Plan, violate any existing air quality standard, result in a cumulatively considerable net increase of criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. Implementation of Tier II the proposed project would be expected to result in cumulative construction-related impacts and impacts during operation that would remain above the level of significance with the incorporation of mitigation measures. Unlike Tier II of the proposed project, the No Tier II Alternative would avoid potential significant impacts to air quality that would result from emissions from construction equipment and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts related to Tier I of the proposed project only. Since there would be no impacts to ambient air quality with the No Tier II Alternative, implementation of measures Air-1 through Air-9 would not be required.

Cultural Resources

Tier I

Like Tier II of the proposed project, Tier I of the No Tier II Alternative would have the potential to result in impacts to cultural resources. The No Tier II Alternative would still slightly alter the appearance of existing historic resources with the development of the new structure. Like the proposed project, this alternative would entail ground-disturbing construction activities. Outside of the new development, the proposed project site would continue in its existing form with cultural resources largely unchanged. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Measures Cultural-1 through Cultural-5 specified for Tier I of the proposed project would be required.

Tier II

Unlike Tier II of the proposed project, the No Tier II Alternative would not have the potential to result in significant impacts to cultural resources. The No Tier II Alternative would avoid the construction-related and redevelopment impacts to cultural resources that would occur as a result of the proposed project. Unlike Tier II of the proposed project, the No Tier II Alternative would entail no ground-disturbing construction activities and the demolition or substantial alteration of cultural resources would not occur. As a result, the project site would continue in its existing form with its cultural resources unchanged. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts related to Tier I of the proposed project only. Since there would be no impacts to cultural resources with the No Tier II Alternative, implementation of measures Cultural-1 through Cultural-5 specified for Tier II of the proposed project would not be required.

Geology and Soils

Tier I

Like Tier I of the proposed project, Tier I of the No Tier II Alternative would have the potential to result in impacts to geology and soils. As with Tier I of the proposed project described in Section 3.4 of this EIR, this alternative would have potential impacts to geology and soils from the implementation of the proposed project. Like Tier I of the proposed project, this alternative would entail grading (excavation and fill), modification of existing structures, and construction of new structures. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Implementation of the mitigation measures identified for Tier I of the proposed project would be required. measures Geology-1 through Geology-3 specified for Tier I of the proposed project would be required.

Tier II

Unlike Tier II of the proposed project, the No Tier II Alternative would not have the potential to result in significant impacts to geology and soils. The No Tier II (in Tier I) Alternative avoids potential impacts to geology and soils that could result from the implementation of the proposed project. This alternative would avoid short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier II of the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures, or construction of new structures and implementation of the mitigation measures would not be required. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to geology and soils with the No Tier II Alternative, implementation of measures Geology-1 through Geology-3 specified for Tier II of the proposed project would not be required.

Greenhouse Gas Emissions

Tier I

Like the proposed project, Tier I of the No Tier II Alternative would have the potential to result in impacts to GHG emissions with regard to Tier I development. Due to the fact that the No Tier II Alternative would not entail a Tier II component and would thus require less construction, less electricity consumption, and less vehicle trips than the proposed project, the No Tier II Alternative is considered to have fewer impacts to GHG emissions compared with the proposed project. Unlike the proposed project, this alternative would not entail demolition of existing structures or major construction activities beyond Tier I of the proposed project. The No Tier II Alternative would still require the use of construction equipment, would generate vehicle trips, and would require electricity consumption, thus resulting in potentially significant impacts to GHG emissions. As with Tier I of the proposed project described in Section 3.5 of this EIR, the No Tier II Alternative would have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment, and would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Measure GHG-1 specified for Tier I of the proposed project would be required. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Since there would be no GHG emissions associated with Tier II, implementation of mitigation measures associated with Tier II of the proposed project would not be required for this alternative.

Tier II

Unlike Tier II of the proposed project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to GHG emissions. The No Tier II Alternative would not involve any construction, operation, or maintenance activities beyond the baseline conditions. Unlike Tier II of the proposed project, this alternative would not entail demolition of existing structures, use of construction materials or equipment, fuel combustion by on-site construction equipment, construction worker commute trips, asphalt operations, or electricity consumption beyond the baseline conditions. The No Tier II Alternative would not require the use of construction equipment or mobile or stationary facilities, thus avoiding any potentially significant impacts to GHG emissions. Unlike Tier II of the proposed project, the No Tier II Alternative would not have the potential to directly or indirectly generate GHG emissions that may have a significant impact on the environment; and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Potential GHG emission impacts associated with construction and operation of Tier II would remain as significant and unavoidable even with the incorporation of mitigation measures. Unlike Tier II of the proposed project, the No Tier II Alternative would avoid potential significant impacts to GHG emissions that would result from emissions from construction equipment, electricity consumption, and the anticipated increase in vehicle miles traveled to the proposed project site by employees and visitors. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts related to Tier I of the proposed project only. Since there would be no impacts to GHG emissions with the No Tier II Alternative, implementation of measure GHG-1 would not be required.

Hazards and Hazardous Materials

Tier I

Like the proposed project, Tier I of the No Tier II Alternative would have the potential to result in impacts to hazards and hazardous materials. As with Tier I of the proposed project as described in Section 3.6, this alternative would have the potential to result in impacts to hazards and hazardous materials. Like the proposed project, this alternative would entail grading (excavation and fill) and construction of new structures. However, this alternative would not entail demolition or the impacts associated with Tier II of the proposed project. Potential operational impacts from hazards or hazardous materials would likely occur. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Measures Hazards-1 through Hazards-5 identified in Section 3.6 for Tier I of the proposed project would be required.

Tier II

Unlike Tier II of the proposed project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The No Tier II (in Tier I) Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the proposed project. Unlike Tier I of the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6 would not be required. Potential operational impacts from hazards or hazardous materials would not occur. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. The

No Tier II Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Since there would be no impacts to hazards and hazardous materials with the No Tier II Alternative, implementation of measures Hazards-1 through Hazards-5 specified for Tier I of the proposed project would not be required.

Hydrology and Water Quality

Tier I

Like the proposed project, Tier I of the No Tier II Alternative would have the potential to result in impacts to hydrology and water quality. Because there are grading and construction related activities, implementation of the mitigation measures identified in Section 3.7 would be required to reduce impacts from pollution entering the storm drain system for Tier I of the proposed project. However, this alternative would not include Tier II development and would not have the potential to result in Tier II impacts. Like the proposed project, this alternative would require the implementation of Tier I Measures Hydrology-1 through Hydrology3, and Hazards-1. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts.

Tier II

Unlike Tier I of the proposed project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to hazards and hazardous materials. The No Tier II (in Tier I) Alternative avoids potential impacts to hazards and hazardous materials that could result from the implementation of the proposed project. Unlike Tier I of the proposed project, this alternative would entail no grading (excavation and fill), modification of existing structures that might result in impacts related to hazards and hazardous materials, or construction of new structures; the implementation of the emergency procedures identified in Section 3.6 would not be required. Potential operational impacts from hazards or hazardous materials would not occur. The No Tier II Alternative would not result in short- or long-term impacts from hazards and hazardous materials. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to hazards and hazardous materials with the No Tier II Alternative, implementation of measures Hazards-1 through Hazards-5 specified for Tier I of the proposed project would not be required.

Noise

Tier I

Like the proposed project, Tier I of the No Tier II Alternative would have the potential to result in significant impacts to noise. Under this alternative, the construction-related noise impacts associated with Tier I of the proposed project would occur, as discussed in Section 3.8 of this EIR. However, Tier II–related noise impacts would be avoided. Like the proposed project, this alternative would be expected to result in construction-related noise impacts. However, by omitting the Tier II component, this alternative would be expected to result in fewer impacts associated with construction-related noise than would be expected to result from the proposed project. Like Tier I of the proposed project, this alternative would result in cumulatively considerable impacts. Measures Noise-1 through Noise-4 specified for Tier I of the proposed project would be required.

Tier II

Unlike Tier II of the proposed project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to noise. The No Tier II Alternative would not entail for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Section 3.8 of this EIR provides mitigation for short- and long-term construction and operation impacts that would occur as a result of the proposed project. Unlike Tier II of the proposed project, the No Tier II Alternative would not result in impacts related to noise and no mitigation measures would be required. The No Tier II Alternative would not result in short- or long-term impacts to noise. Like Tier II of the proposed project, this alternative would result in cumulatively considerable impacts related to Tier I of the proposed project only. Since there would be no impacts to noise with the No Tier II Alternative, implementation of measures Noise-1 through Noise-4 specified for Tier II the proposed project would not be required.

Population and Housing

Tier I

Like the proposed project, Tier I of the No Tier II Alternative would not have the potential to result in significant impacts to population and housing. Like the proposed project, this alternative would not be expected to result in impacts related to population and housing. Like the proposed project, this alternative would include a Tier I element but it would not include Tier II development, which entails a residential component. Although the Tier I components of the alternative would address the existing needs of the population, this alternative would not contribute to regional housing and employment goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area), as discussed in Section 3.9 of this EIR for Tier II of the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, there would be no impacts to population and housing with this alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to population and housing. The No Tier II Alternative would not assist in meeting regional housing and employment goals. Under the No Tier II Alternative, potential changes related to population and housing would not occur. This alternative would not result in any residential development or more intensive development associated with the medical, commercial or retail uses under the proposed project. Even though potential impacts resulting from Tier II of the proposed project would not be considered significant, the No Tier II Alternative's impacts to population and housing would be less than the proposed project because no change, such as the 100 unit residential component, would be implemented. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. However, the No Tier II Alternative would not contribute to the regional housing goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area). As with Tier II of the proposed project, there would be no impacts to population and housing with the No Tier II Alternative, and no mitigation measures would be required.

Public Services

Tier I

Like the proposed project, Tier I of the No Tier II Alternative would not have the potential to result in significant impacts to public services. As with Tier I of the proposed project as described in Section 3.11 of this EIR, the No Tier II Alternative would not result in impacts related to public services. This alternative would not require the development of residential units. Unlike the proposed project, there would be no Tier II development. There would not be an increase in the need for additional fire protection, police protection, parks, schools, and other public services, like the proposed project. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. However, this alternative would not contribute to regional housing and employment goals (i.e., SCAG Compass Blueprint, 2% Strategy Opportunity Area) as discussed for Tier II of the proposed project. However, like the proposed project, this alternative would not result in significant impacts related to public services and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to public services. The No Tier II Alternative would not result in the need for additional fire protection, police protection, schools, parks, and other public services. Section 3.10 of this EIR provides a discussion of the potential impact to public services related to Tier II of the proposed project. Like Tier II of the proposed project, the No Tier II Alternative would not create a significant net increase in public services and would require the implementation of the mitigation measures. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to public services with the No Tier II Alternative, and no mitigation measures would be required.

Recreation

Tier I

Like the proposed project, Tier I of the No Tier II Alternative would not have the potential to result in significant impacts to recreation. Under the No Tier II Alternative, Tier I of the proposed project would be developed as discussed in Section 3.10 of this EIR, but Tier II building components would not be constructed. The No Tier II Alternative would result in no residential units built. Like the proposed project, this alternative would not be expected to result in impacts related to recreation. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, there would be no impacts to recreation with this alternative, and no mitigation measures would be required.

Tier II

As with Tier II of the proposed project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to recreation. The No Tier II Alternative would not result in impacts to parks and recreational facilities. The No Tier II Alternative would also not create an additional demand for the County's parks. Tier II of the proposed project would not result in significant impacts to existing parks or recreational facilities given the limited number of residential

units proposed under Tier II and the availability and location of existing recreational facilities. Like Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. As with Tier II of the proposed project, there would be no impacts to recreation with the No Tier II Alternative, and no mitigation measures would be required.

Transportation and Traffic

Tier I

Like the proposed project, Tier I of the No Tier II Alternative would have the potential to result in significant impacts to transportation and traffic. The No Tier II Alternative would result in a smaller development scenario than that of the proposed development components of Tier II for the proposed project. The total development under this alternative would be significantly less than that of the proposed project, as it would only entail Tier I of the proposed project and would generate substantially fewer traffic trips given the reduced development. Construction-related Tier I impacts would occur as discussed in Section 3.12, Transportation and Traffic, of this EIR, and the Tier I mitigation measures would be required. Tier I trip generation for Tier I of this alternative would be the same as that of the Tier I of the proposed project. Tier I would result in 2,586 daily trips of which 176 trips would occur in the morning peak hour and 179 trips would occur in the evening peak hour. Since Tier I also involves removal of existing uses, a net reduction in trips of approximately 4,905 daily trips, 332 AM trips, and 338 PM trips would occur. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. As with the proposed project, implementation of measure Traffic-1 specified for Tier I of the proposed project would be required.

Tier II

As with Tier II of the proposed project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to recreation. The No Tier II Alternative would not result in impacts to parks and recreational facilities. The No Tier II Alternative would also not create an additional demand for the County's parks. Tier II of the proposed project would not result in significant impacts to existing parks or recreational facilities given the limited number of residential units proposed under Tier II and the availability and location of existing recreational facilities. Since this alternative would not contain Tier II development but involves vacation of existing buildings, this alternative would result in fewer trips than that projected for the proposed project. This alternative would result in the net reduction of trips on the street system since it would not generate any net new trips. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no Tier II impacts to transportation and traffic with the No Tier II Alternative, implementation of measures Traffic-1 though Traffic-3 specified for Tier II of the proposed project would not be required.

Utilities and Service Systems

Tier I

Like the proposed project, Tier I of the No Tier II Alternative would have the potential to result in significant impacts to utilities and service systems. The No Tier II Alternative would result in greater impacts that are comparable to Tier I of the proposed project as discussed in Section 3.13, Utilities and Service Systems, of this EIR. However, the impacts from Tier II development would be avoided

as this alternative would not entail additional development proposed in the Tier II components (i.e., no residential, retail, commercial uses, etc). The total development under this alternative would be less than that of the proposed project; therefore, this alternative would result in less demand on water supply, wastewater treatment facilities, landfills, and recycling facilities. Like Tier I of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no Tier II impacts to utilities and service systems with the No Tier II Alternative, implementation of mitigation measures specified for Tier II of the proposed project would not be required.

Tier II

Unlike Tier II of the proposed project, Tier II of the No Tier II Alternative would not have the potential to result in significant impacts to utilities and service systems. The No Tier II (in Tier I) Alternative avoids potential impacts to utilities and service systems that could result from the implementation of Tier II of the proposed project. The No Tier II Alternative would not result in the short- or long-term construction and operation impacts that would occur as a result of the proposed project. Unlike the proposed project, this alternative would entail no additional construction of buildings and would not require additional use of existing infrastructure (i.e., sewer, water, etc.). With the No Tier II Alternative, mitigation measures would not be required. Unlike Tier II of the proposed project, this alternative would not result in cumulatively considerable impacts. Since there would be no impacts to utilities and service systems with the No Tier II Alternative, implementation of Measures Utilities-1 through Utilitites-2 specified for Tier II of the proposed project would not be required.

SECTION 5.0
UNAVOIDABLE IMPACTS

This section of the Environmental Impact Report (EIR) provides an analysis of the potential for implementation of the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) to result in significant environmental effects that cannot be avoided. Consistent with the requirements of section 15126.2(b) of the State California Environmental Quality Act Guidelines (State CEQA Guidelines), significant impacts, including those that can be mitigated but not reduced to below the level of significance, are described in this section of the EIR. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications, and the reasons why the project is being proposed, notwithstanding their effect, are also described. The potential for the construction, operation, and maintenance of the proposed project to result in significant environmental impacts has been analyzed in Section 3.0, *Existing Conditions, Impacts, Mitigation, and Level of Significance after Mitigation*, of this EIR.

Based on the analysis contained in the Initial Study (Appendix A, *Initial Study, Scoping Meeting Comments, and Comment Letters*), the proposed project would be expected to result in less-than-significant or no impacts related to the following issue areas:

- Agriculture and Forestry Resources
- Biological Resources
- Land Use and Planning
- Mineral Resources

TIER I

Based on the analysis contained in Section 3.0 of this EIR, Tier I of the proposed project would be expected to result in less than significant or no impacts to the following issue areas:

- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

Table 5-1, *Summary of Tier I Environmental Impacts Identified in the EIR*, provides a summary of the Tier I environmental impacts that were identified in this EIR.

TABLE 5-1
SUMMARY OF TIER I ENVIRONMENTAL IMPACTS IDENTIFIED IN THE EIR

Less Than Significant / Not Significant	Less Than Significant after Mitigation	Mitigation Measure	Significant after Mitigation
Aesthetics (scenic vista, scenic highway or resources, visual character, shade/shadow)	Aesthetics (light/glare)	Aesthetics-1	
Air Quality (air quality plan and odors during construction)	Air Quality (air quality standards, cumulative, and sensitive receptors during construction)	Air-1 to Air-9	
Cultural Resources (archeological resource)	Cultural Resources (historic resource, paleontological resource, and human remains)	Cultural-1 to Cultural-5	
Geology and Soils (earthquake fault, seismic ground shaking, seismic ground failure: liquefaction, landslides, and septic tank)	Geology and Soils (soil erosion or loss of top soil, geologic unit or unstable soil, and expansive soil)	Geology-1 to Geology -3	
Greenhouse Gas Emissions (applicable plans / policies)	Greenhouse Gas Emissions (operation)	GHG-1	Greenhouse Gas Emissions (construction)
Hazards and Hazardous Materials (routine transport, use, or disposal, airport land use plan, private airstrip, emergency response, and wildland fires)	Hazards and Hazardous Materials (accidental release, 0.25 mile of an existing or proposed school, and Government Code Section 65962.5)	Hazards-1 to Hazards-5	
Hydrology and Water Quality (groundwater supplies, drainage: erosion or siltation, drainage: flooding, 100-year flood zone: housing, 100-year flood zone: structures, and flooding: levee or dam)	Hydrology and Water Quality (water quality standards, waste discharge, runoff water, and degrade water quality during construction and limited operation)	Hydrology-1 to Hydrology-3 and Hazards-1	
Noise (operational noise, excessive noise levels, ambient noise, groundbourne vibration, air ports, and private air strips)	Noise (groundbourne vibration and mechanical noise during construction)	Noise-1 to Noise-4	Noise (temporary ambient noise increase during construction)
Transportation and Traffic (air traffic, hazardous design features, emergency access, and adopted alternative transportation mode plans)	Transportation and Traffic (circulation system and congestion during construction)	Traffic-1	

TIER II

Based on the analysis contained in Section 3.0 of this EIR, Tier II of the proposed project would be expected to result in less than significant or no impacts related to the following issue areas:

- Population and Housing
- Public Services
- Recreation

Table 5-2, *Summary of Tier II Environmental Impacts Identified in the EIR*, summarized the Tier II environmental impacts that were identified in this EIR:

TABLE 5-2
SUMMARY OF TIER II ENVIRONMENTAL IMPACTS IDENTIFIED IN THE EIR

Less Than Significant / Not Significant	Less Than Significant after Mitigation	Mitigation Measures	Significant after Mitigation
Aesthetic resources (scenic vista and scenic highway or resources)	Aesthetic resources (visual character and light/glare)	Aesthetics-1 to Aesthetics-4	
Air Quality (air quality plan and odors during construction)		Air-1 to Air-9	Air Quality (air quality standards, cumulative, sensitive receptors during construction and limited operation)
Cultural Resources (archeological resource)	Cultural Resources (paleontological resource and human remains)	Cultural-1 to Cultural-5	Cultural Resources (historic resource, paleontological resource, human remains)
Geology and Soils (earthquake fault, seismic ground shaking, seismic ground failure: liquefaction, landslides, and septic tank)	Geology and Soils (soil erosion or loss of top soil, geologic unit or unstable soil, and expansive soil)	Geology-1 to Geology -3	
Greenhouse Gas Emissions (applicable plans / policies)	Greenhouse Gas Emissions (operation)	GHG-1	Greenhouse Gas Emissions (construction)
Hazards and Hazardous Materials (routine transport, use, or disposal; airport land use plan; private airstrip; emergency response; and wildland fires)	Hazards and Hazardous Materials (accidental release, 0.25 mile of an existing or proposed school, and Government Code Section 65962.5)	Hazards-1 to Hazards-5	
Hydrology and Water Quality (groundwater supplies, drainage: erosion or siltation, drainage: flooding, 100-year flood zone: housing, 100-year flood zone: structures, and flooding: levee or dam)	Hydrology and Water Quality (water quality standards, waste discharge, runoff water, and degrade water quality during construction and operation)	Hydrology-1 to Hydrology-4 and Hazards-1	

TABLE 5-2
SUMMARY OF TIER II ENVIRONMENTAL IMPACTS IDENTIFIED IN THE EIR, Continued

Less Than Significant / Not Significant	Less Than Significant after Mitigation	Mitigation Measures	Significant after Mitigation
Noise (operational noise, excessive noise levels, ambient noise, groundbourne vibration, air ports, and private air strips)	Noise (groundbourne vibration and mechanical noise during construction)	Noise-1 to Noise-4	Noise (temporary ambient noise increase during construction)
Transportation and Traffic (air traffic, hazardous design features, emergency access, and adopted alternative transportation mode plans)	Transportation and Traffic (circulation system and congestion during construction, operation, and cumulatively)	Traffic-1 to Traffic-3	
Utilities and Service Systems (new water or wastewater facilities, new stormwater drainage facilities, wastewater treatment capacity, and landfill capacity)	Utilities and Service Systems (wastewater treatment requirements and solid waste compliance)	Utilities-1 to Utilities 2	

Although mitigation measures have been proposed for air quality, cultural resources, and noise that would reduce the potentially significant impacts to the maximum extent practicable, construction-related impacts associated with air quality, cultural resources, and noise would remain significant and unavoidable, even with the implementation of mitigation measures.

Pursuant to CEQA, this EIR identifies six alternatives (including the No Project Alternative) capable of avoiding some or all of the environmental impacts associated with the proposed project. The alternatives to the proposed project are described in Section 4.0, *Alternatives to the Proposed Project*, of this EIR. Of the six alternatives, the No Project Alternative is capable of avoiding most of the potentially significant environmental impacts; while only the Reduced Project Size Alternative is capable of meeting most of the basic objectives of the proposed project.

SECTION 6.0
SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES RELATED TO IMPLEMENTATION OF THE PROPOSED PROJECT

This section of the Environmental Impact Report (EIR) summarizes the potential for implementation of the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) to result in significant irreversible environmental changes. Such a change refers to an irretrievable commitment of non-renewable resources, such as those used as building materials, or other environmental changes, such as urbanization, that commit future generations to the use of natural resources.

TIER I

The analysis performed in Section 3, *Regulatory Framework, Existing Conditions, Impacts, Mitigation, and Level of Significance after Mitigation*, determined that the proposed project would not result in significant irreversible environmental impacts.

Although development of the proposed project would entail the use of natural resources for building materials that would result in an irreversible impact and a commitment of resources (such as lumber, steel and concrete aggregate), the County of Los Angeles (County) seeks to limit the impact on natural resources by designing Tier I of the proposed project to have reduced environmental impacts. Development of the new Multi-Service Ambulatory Care Center (MACC) and the Ancillary Building is currently registered with the U.S. Green Building Council under Leadership in Energy and Environmental Design for New Construction (LEED-NC). "Materials and resources" is one classification recognized as an area for impact reduction to receive LEED certification, which will be explored by the County as an option, in addition to the areas of water efficiency, energy and atmosphere efficiencies, and indoor environmental quality. The County will seek LEED Silver certification for the MACC and the Ancillary Building, and the proposed project would incorporate energy-efficient and sustainable strategies throughout the construction, development, and operation phases.

Further, the proposed project is located in an urbanized area on a previously graded and developed site, and would not result in a new commitment of non-urban land to urban uses. The proposed project would focus development within an area identified by the Southern California Association of Governments (SCAG) for intensified growth, consistent with the growth vision for the region. The proposed project site falls within an identified preferred location for growth (i.e., SCAG 2% Strategy Area[1]), which are locations that have been identified for promotion of reinvestment in urbanized areas where transit and urban infrastructure is available as a way to make better use of existing infrastructure and regional resources.

LEED-certified buildings conserve natural resources through practices such as using recycled materials, reusing existing materials, using less potable water for landscaping and wastewater uses, using less energy, and converting waste from landfills. The proposed project would institute these and other comparable practices to reduce the consumption of nonrenewable resources by the proposed project. Due to the benefit of the proposed project's location and implementation of project design features and mitigation measures, impacts related to consumption of nonrenewable

[1] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, 2% Strategy." Available at: http://www.compassblueprint.org/about/strategy

resources and commitment of resources due to development of the proposed project would remain below the level of significance.

TIER II

Although Tier II of the proposed project would be more substantial in size than Tier I of the proposed project, Tier II would not be expected to result in significant irreversible environmental impacts for reasons similar to those discussed for Tier I of the proposed project above.

Although development of the proposed project would entail the use of natural resources for building materials that would result in an irreversible impact and a commitment of resources (such as lumber, steel and concrete aggregate), the County seeks to design Tier II of the proposed project to have limited environmental impacts. As discussed in Section 2.0, Project Description, of this EIR and throughout the EIR document, all County buildings that are 10,000 square feet or larger are required to seek LEED certification and comply with other environmental policy measures. The County will explore the "materials and resources" classification, which is recognized as an area to reduce impacts to receive LEED certification, in addition to the areas of water efficiency, energy and atmosphere efficiencies, and indoor environmental quality. The County will seek LEED Silver certification for the Tier II development, and the proposed project would incorporate energy-efficient and sustainable strategies throughout the construction, development, and operation phases.

Further, as previously discussed, the proposed project is located in an urbanized area on a previously graded and developed site, and would thus not result in a new commitment of non-urban land to urban uses. Further, the proposed project would focus development within an area identified for intensified growth by SCAG, consistent with the growth vision for the region. The project site falls within an identified preferred location for growth (i.e., SCAG 2% Strategy Area[2]), which, as previously noted, are locations that have been identified for promotion of reinvestment in urbanized areas, such as the proposed project, where transit and urban infrastructure is available, as a way to make better use of existing infrastructure and regional resources.

As previously noted, LEED-certified buildings conserve natural resources through practices such as using recycled materials, reusing existing materials, using less potable water for landscaping and wastewater uses, using less energy, and converting waste from landfills. The proposed project would institute these and comparable practices to reduce the use of nonrenewable resources. Due to the benefit of the proposed project's location and implementation of project design features and mitigation measures, impacts related to consumption of nonrenewable resources and commitment of resources due to development of the proposed project would remain below the level of significance.

[2] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, 2% Strategy." Available at: http://www.compassblueprint.org/about/strategy

SECTION 7.0
GROWTH-INDUCING IMPACTS

This section of the Environmental Impact Report (EIR) analyzes the potential for the proposed Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) to result in growth-inducing impacts. Such impacts normally occur when a proposed project fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. The types of projects normally considered to result in growth-inducing impacts are those that provide infrastructure suitable to support additional growth or that removes an existing barrier to growth. The anticipated direct and indirect impacts associated with the proposed project are discussed below.

DIRECT IMPACTS

Tier I

Tier I of the proposed project involves a downsizing of existing facilities. As such it would not entail growth-inducing elements and would not be expected to result in direct impacts. Tier I of the proposed project would replace services that are currently being provided at the proposed project site. There would be a shift with respect to the location of where these services are provided, as the existing outpatient services would be moved into the new Multi-Service Ambulatory Care Center (MACC) and Ancillary Building, however, this would not result in significant population growth. In addition, the sustainable design elements may have a beneficial cost savings for the operation costs of these services for the County, as it would be expected that water, energy, and other operational costs would be reduced through increased efficiency.

Tier II

The proposed project may entail growth-inducing elements, including the development of a 100-unit residential component and creation of jobs (both construction-related and operational) at the proposed project site. However, the anticipated growth related to these elements would not be significant as it would not be expected to induce substantial population growth and would be consistent with the growth projections anticipated by the Southern California Association of Governments (SCAG; as discussed in Section 3.9, *Population and Housing*, of this EIR). The proposed project site is located within the 2% Strategy Opportunities Area (City of Los Angeles South Map), which seeks to target growth where projects, plans, and policies consistent with the SCAG growth guidelines will best serve the mobility, livability, prosperity, and sustainability goals of the SCAG growth plan.[1] As such, the growth and development that would be expected to result from development of the proposed project would be consistent with anticipated and desired growth at the proposed project site and in the surrounding area.

The proposed project is primarily a medical center facility and would provide services to meet the medical and other needs (such as retail and commercial) of an existing population. The existing community is underserved by the partially operational facilities that are currently at the site, as such growth associated with the proposed project would address and would be correspondent to the current and anticipated shifts and growth in population surrounding the proposed project site.

[1] Southern California Association of Governments. Accessed 18 June 2010. "Compass Blueprint, 2% Strategy." Available at: http://www.compassblueprint.org/about/strategy

Furthermore, the housing element of the proposed project would be anticipated to meet a projected housing need in the area surrounding the proposed project site. Given the small number and the types of jobs associated with the proposed land uses in Tier II of the proposed project, substantial population impacts due to operation of the commercial/retail component are not anticipated, as discussed in Section 3.9 of this EIR. As such, the proposed project would not be expected to contribute to adverse direct growth-inducing impacts.

INDIRECT IMPACTS

The proposed project would not provide infrastructure that would be suitable to support additional growth or that would remove an existing barrier to growth. The proposed project is located in a developed area with permanent roads, utilities, and infrastructure capable of meeting the access, utilities, and service needs of the proposed project. The proposed project would be an urban infill project, making better use of capacity in the existing urban infrastructure. Project features and mitigation measures associated with the proposed project would result in localized improvements to address project-related demand for infrastructure, but would not require new access roads, utilities, or infrastructure that might contribute to indirect growth-inducing impacts.

Tier I

Tier I of the proposed project would not entail indirect growth-inducing elements. The existing proposed project site contains the infrastructure to complete the proposed project, and no additional new access roads, utilities, or infrastructure or other elements would be developed that would create indirect growth-inducing impacts.

Tier II

Although additional development is proposed as part of Tier II of the proposed project, Tier II would address the existing and projected need for health care and related services in the County of Los Angeles, and would be expected to supplement and contribute to meeting the health care needs and enhance the economic vitality of the County of Los Angeles and, specifically, the community surrounding the proposed project site.

In addition, because the proposed project site is located within the 2% Strategy Opportunities Area and would support the existing and anticipated planned growth in the area, the proposed project would be positioned to fulfill the anticipated health care needs of the current and projected community growth and would not result in growth beyond the planned growth in the area. The proposed project would have the capacity to accommodate and support the anticipated planned growth in the surrounding community without requiring new infrastructure; therefore, the proposed project would not contribute to indirect growth-inducing impacts.

SECTION 8.0
MANDATORY FINDINGS OF SIGNIFICANCE

This analysis was undertaken by the County of Los Angeles (County) to determine if the Martin Luther King, Jr. Medical Center Campus Redevelopment Project (proposed project) would be expected to have a significant impact to Mandatory Findings of Significance, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15065 of the State California Environmental Quality Act (CEQA) Guidelines.[1] Mandatory Findings of Significance for the proposed project were evaluated with regard to the information contained in this Environmental Impact Report (EIR), and information gathered during literature reviews (see Section 11.0, References, for a list of reference materials consulted).

State CEQA Guidelines (Section 15065) recommend the consideration of four questions when addressing the potential for significant impacts to Mandatory Findings of Significance.

Does the proposed project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Tier I

Tier I of the proposed project would not be expected to result in potentially significant impacts related to the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

Tier I of the proposed project would be located on an existing hospital campus in a highly urbanized area. As discussed in the Biological Resources Technical Report (Appendix D) prepared for the proposed project, there are no Significant Ecological Areas (SEA),[2] federally or state-listed species by the California Department of Fish and Game (CDFG) or by the United States Fish and Wildlife Service (USFWS), nor any state or local species of concern are present on the project location or in any adjacent areas. Furthermore, the proposed project site does not have the habitat available to support wildlife, as such, Tier I of the proposed project would not be expected to result in potentially significant impacts related to the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed in Section 3.3, *Cultural Resources*, of this EIR, construction of the Tier I would have a less than significant effect on historical resources. Improvements would affect

[1] *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[2] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

character-defining features of three historic resources: 1) appurtenant elements of the Martin Luther King, Jr. Medical Center Campus Historic District, specifically those associated with 2) the Augustus F. Hawkins Comprehensive Mental Health Center and 3) the Interns and Physicians Building. However, the Tier I project would not result in substantial adverse changes in the significance of historic resources such that the historic district or its contributors would no longer be eligible for inclusion in the California Registry of Historical Resources (CRHR).

As such, Tier I of the proposed project would not be expected to result in potentially significant impacts related to eliminating important examples of the major periods of California history or prehistory.

Tier II

Tier II of the proposed project would be expected to result in potentially significant impacts related to the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory that may not be able to be reduced to below the level of significance through the incorporation of mitigation measures, therefore requiring the consideration of alternatives.

Like Tier I of which was analyzed above, Tier II of the proposed project would be located on an existing hospital campus in a highly urbanized area. As discussed in the Biological Resources Technical Report (Appendix D) prepared for the proposed project, there are no SEAs,[3] special-status species listed by the CDFG or by the USFWS, or any state or local species of concern present on the project location or in any adjacent areas. Furthermore, the proposed project site does not have the habitat available to support wildlife, as such, Tier II of the proposed project would not be expected to result in potentially significant impacts related to the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal.

As analyzed in Section 3.3 of this EIR, construction of the Tier II improvements would be expected to affect two historic resources: 1) appurtenant elements of the Martin Luther King, Jr. Medical Center Campus Historic District and 2) the Multi-Service Ambulatory Care Center (MACC) building. If Tier II improvements include the demolition and replacement of the MACC, a significant adverse change in the significance of the Martin Luther King, Jr. Medical Center Campus Historic District and the MACC would occur and neither resource would continue to be eligible for inclusion in the CRHR. If Tier II improvements include rehabilitation and reuse of the MACC, impacts to cultural resources would be reduced to below the level of significance with the implementation of mitigation measures. Due to the conceptual and evolving nature of the proposed project regarding the future use of the MACC building, modification assumptions for this analysis assume that the master planning and comprehensive redevelopment of the campus under Tier II has the potential to result in

[3] County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Available at: http://planning.lacounty.gov/generalplan#gp-existing

the worst-case scenario (reuse, removal, or replacement) of proposed project impacts as well as additional alterations to the character-defining features (buildings and appurtenant elements) of the Martin Luther King, Jr. Medical Center Campus Historic District. Implementation of Tier II of the proposed project has the potential to result in significant impacts to eliminating important examples of the major periods of California history or prehistory, which may require the consideration of alternatives.

Does the proposed project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Tier I

Tier I of the proposed project would be expected to result in less than significant impacts that are individually limited but cumulatively considerable. As discussed it this EIR, Tier I of the proposed project the construction and operational related impacts of Tier I would not be expected to contribute to the incremental environmental impacts when viewed in connection with the effects of past, current, or reasonably foreseeable projects. Therefore, the expected impacts that are individually limited but cumulatively considerable would be expected to be reduced to below the level of significance by the incorporation of mitigation measures. Further analysis is warranted.

Tier II

The impacts that are individually limited but cumulatively considerable from the proposed project would be expected to be reduced to below the level of significance with the incorporation of mitigation measures. The proposed project may be expected to contribute to the incremental environmental impacts when viewed in connection with the effects of past, current, or reasonably foreseeable projects. As discussed in this EIR, Tier II of the proposed project would entail development that would be expected to result in cumulative impacts to air quality, greenhouse gases, noise, and traffic and transportation. Although these impacts would be largely temporary and localized, they may have the potential to result in incremental effects that when considered in connection to other projects could result in potentially significant impacts. The County has proposed efforts to minimize these impacts through the use of best management practices (BMPs) and sustainable practices for the development and operation of the proposed project. However, impacts that are individually limited but cumulatively considerable from the proposed project would be expected to be reduced to below the level of significance with the incorporation of mitigation measures discussed in Sections 3.2, *Air Quality*; 3.5, *Greenhouse Gas Emissions*; and 3.8, *Noise*, of the EIR.

Does the project have the potential to result in the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Tier I

Tier I of the proposed project would not be expected to result in significant impacts related to the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. Although Tier I of the proposed project would result in adverse short-

term construction related impacts, the long-term effects of Tier I would result in a beneficial impact related to environmental goals. The proposed project would entail the implementation of BMPs, sustainable measures, and Leadership in Energy and Environmental Design (LEED) elements that would be consistent with the Countywide Energy and Environmental Policy and would achieve long-term environmental goals for the County.

Tier II

As with Tier I of the proposed project discussed above, Tier II of the proposed project would not be expected to result in significant impacts related to the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. Although Tier II of the proposed project would result in adverse short-term, construction-related impacts and may include significant adverse environmental impacts (i.e. air quality or cultural resources) mitigation measures would significantly reduce these impacts; the long-term effects of Tier II would result in a beneficial impact related to environmental goals. Tier II of the proposed project would be designed to address the needs of the planned growth in the proposed project area. Additionally, the proposed project would entail the implementation of BMPs, sustainable measures, and LEED elements that would be consistent with the Countywide Energy and Environmental Policy and would achieve long-term environmental goals for the County. Therefore, Tier II of the proposed project would not be expected to result in impacts that have the potential to result in the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.

Does the proposed project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Tier I

Tier I of the proposed project would not be expected to result in significant impacts related to having environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly that would be able to be reduced to below the level of significance through the incorporation of mitigation measures. While the adverse impacts related to the construction of the proposed project would be temporary, the implementation of BMPs, sustainable measures, and LEED elements, and mitigation measures would significantly reduce these impacts. In addition, it is anticipated that the proposed project would result in less than significant operational impacts due to the fact that the proposed project is designed to create more efficient structures on the proposed project site, and would entail the implementation of sustainable elements into the developmental and operational phases of the proposed project. The proposed project could be expected to result in impacts to air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, traffic and transportation, and utilities and service systems. These impacts would not be considered substantial to human beings as they would be limited and would be significantly reduced by the County's efforts to provide inpatient hospital functions and support spaces in conjunction with a community-based health care program that would be seismically compliant beyond 2030 seismic standards established by the California Office of Statewide Health Planning and Development. The beneficial environmental impacts discussed throughout this EIR (i.e., seismic upgrades for compliance to 2030 and beyond)

would be expected to have positive impacts on human beings and their environment although the potentially adverse impacts.

Tier II

Tier II of the proposed project would be expected to result in significant impacts to having environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly that would not be able to be reduced to below the level of significance through the incorporation of mitigation measures. While the adverse impacts related to the construction of the proposed project would be temporary, the implementation of BMPs, sustainable measures, and LEED elements, and mitigation measures would significantly reduce these impacts. In addition, it is anticipated that the significant operational impacts would be reduced due to the fact that the proposed project is designed to create more efficient structures on the proposed project site, and would entail the implementation of sustainable elements, BMPs, and LEED elements into the developmental and operational phases of the proposed project. The proposed project could be expected to result in impacts to air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, traffic and transportation, and utilities and service systems. Although, these impacts would be largely limited to construction and would be significantly reduced by the County's efforts to provide a community-based health care program as described above which would contribute to beneficial environmental impacts that would be expected to have positive impacts on human beings and their environment. Tier II of the proposed project would be expected to have the potential to result in adverse indirect impacts on humans with regards to the replacement of a historic resource. Unlike significant and unavoidable impacts to air, greenhouse gas emissions, or noise which would be attributed largely to construction related efforts but would result in operational benefits of the life of the proposed project. The reuse, replacement, or removal of a historic resource would not be offset in the same manner. Therefore, implementation of the proposed project has the potential to result in significant impacts related to environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly and may require the consideration of alternatives.

SECTION 9.0
ORGANIZATIONS AND PERSONS CONSULTED

PUBLIC AGENCIES

Federal

Advisory Council on Historic Preservation
Office of Federal Agency Programs .....Assistant Director, Charlene Dwin Vaughn

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State

Department of Transportation, District 7 .....IGR / CEQA Program Manager, Elmer Alvarez
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Regional

South Coast Air Quality Management District .....Program Supervisor, Ian MacMillan

County of Los Angeles

Department of Public Works .....Traffic and Lighting Staff, Bill Winter
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Fire Department..... Chief, Forestry Division Prevention Services Bureau, John R. Todd
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Department of Parks and Recreation .....Planner, Sheela Mathai
.....Planner, Clement Lau, AICP

Metropolitan Transportation Authority .....Program Manager, Susan Chapman

Natural History Museum ..... Director of Vertebrate Paleontology, Dr. Sam McLeod

Sanitation Districts of Los Angeles County – Public Information .....Manager, Dan Avila
.....Will Serve Program, Adriana Raza

Sheriff's Department .....Director, Facilities Planning Bureau, Gary T.K. Tse

City of Downey

Downey Area Recycling & Transfer (DART) ..... Staff

City of South Gate

South Gate Transfer Station .....Coordinator, Mike Amdahl

City of Los Angeles

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SECTION 11.0
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SECTION 12.0
DISTRIBUTION LIST

This section of the Environmental Impact Report (EIR) contains a list of those entities to which a copy of the Notice of Availability (NOA) of this EIR or a copy of the NOA and a copy of the EIR have been distributed. Organizations or individuals listed below with a superscript(EIR+CD) received a copy of the NOA and Volume I of the EIR in hard copy format and Volume II (Technical Appendix) of the EIR in electronic format on a compact disc (CD). Those with the superscript(CD) received a copy of the NOA and Volumes I and II (Technical Appendix) of the EIR in electronic format on a CD. Organizations or individuals listed below with a superscript(NOA) received a copy of the NOA that directed them to the location of the EIR document.

Copies of the EIR are available during the 45-day public review period, beginning on Tuesday August 31, 2010, and ending on Friday October 15, 2010, at the following library:

Willowbrook Library
Ms. Alice Tang
Community Library Manager
11838 South Wilmington Avenue
Los Angeles, California 90059
Telephone number: (323) 564-5698
Hours of operation: Monday – 10:00 a.m. to 6:00 p.m.
Tuesday – 12:00 p.m. to 8:00 p.m.
Wednesday – 10:00 a.m. to 6:00 p.m.
Thursday – 10:00 a.m. to 6:00 p.m.
Friday – 11:00 a.m. to 5:00 p.m.
Saturday – 11:00 a.m. to 5:00 p.m.
Sunday – Closed

In addition, copies of the EIR are available during the 45-day public review period at the following location:

Martin Luther King, Jr. Multi-Service Ambulatory Care Center[1]

Administration Office
Cynthia Moore-Oliver or Elaine Saafir
12021 South Wilmington Avenue
Los Angeles, California 90059
Telephone number: (310) 668-5201
Hours of operation: Monday – Friday 8:00 a.m. to 4:30 p.m.

[1] Responsible agencies for the proposed project are indicated by an asterisk.

Copies of Volumes I and II of the EIR will be available for purchase, at reproduction cost, from the following location:

Sapphos Environmental, Inc.
430 North Halstead Street
Pasadena, California 91107
Telephone number: (626) 683-3547
Hours of operation: Monday – Friday 8:00 a.m. to 5:00 p.m.

An electronic copy of the EIR is also available online at:

http://ridley-thomas.lacounty.gov/Pages/Issues/mlk_hospital.htm

12.1 PUBLIC AGENCIES

12.1.1 Federal

U.S. Fish and Wildlife Service(CD)

Dr. Roger Helm, Division Chief
Division of Environmental Quality
4401 North Fairfax Drive, Suite 820
Arlington, Virginia 22203
(703) 358-2148

12.1.2 State

California Air Resources Board(CD)

Robert Fletcher, Chief
1001 I Street
Sacramento, California 95812
(916) 322-2990

California Department of Fish and Game(CD)

South Coast Region
Ed Pert, Regional Manager
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201

California Department of Parks and Recreation Office of Historic Preservation*(CD)

Milford Wayne Donaldson, State Historic Preservation Officer
1416 9th Street, Room 1442
Sacramento, California 95814
(916) 653-6624

California Department of Transportation District 7*

Elmer Alvarez, IGR / CEQA Branch Chief(CD)
100 South Main Street
Los Angeles, California 90012
(213) 897-3656

Zeron Jefferson, Associate Transportation Planner(NOA)
100 South Main Street
Los Angeles, California 90012
(213) 897-3656

Deven Thaker(NOA)
100 South Main Street
Los Angeles, California 90012
(213) 897-3656

California Environmental Protection Agency*(CD)

Jami Ferguson, Public Records Officer
1001 I Street
Sacramento, California 95814
(916) 322-2935

California Integrated Waste Management Board(CD)

Chris Peck, Manager of the Office of Public Affairs
1001 I Street
Sacramento, California 95812-4025
(916) 341-6000

California Native American Heritage Commission(CD)

Dave Singleton, Program Analyst
915 Capitol Mall, Room 364
Sacramento, California 95814
(916) 653-6251

California Water Quality Control Board, Region 4*(CD)

Ejigu Solomon, Stormwater Compliance and Enforcement Manager
320 West Fourth Street, Suite 200
Los Angeles, California 90013
(213) 576-6600

Municipal Water District * (CD)

Art Chacon, Director Division III
6252 Telegraph Road
Commerce, California 90040
(323) 201-5500

Office of Planning and Research State Clearinghouse *(EIR + CD)

Scott Morgan, Assistant Deputy Director & Senior Planner, State Clearinghouse
1400 Tenth Street
Sacramento, California 95814
(916) 445-0613

Office of Statewide Health Planning and Development * (CD)

David M. Carlisle, Director
Director's Office
400 "R" Street, Suite 300
Sacramento, California 95811
(916) 326-3600

State Water Resources Control Board *(CD)

Gita Kapahi, Director
1001 I Street
Sacramento, California 95814
(916) 341-5455

12.1.3 Regional

City of Compton (NOA)

Derek R. Hull, Planning and Economic Development Director
Planning and Economic Development Department
205 South Willowbrook Avenue
Compton, California 90220
(310) 605-5532

Compton Unified School District (NOA)

Ann Cooper, Senior Director of Special Projects
500 South Santa Fe Avenue
Compton, California 90221
(310) 632-2825

City of Los Angeles(NOA)

David Weintraub, Senior City Planner
Department of City Planning
Environmental Review Section
200 North Spring Street
Los Angeles, California 90012
(213) 978-1361

City of Los Angeles Department of Transportation(NOA)

Sean Haeri, Senior Transportation Engineer
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470

Edward Guerrero, Jr., Transportation Engineer
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470

Los Angeles Unified School District Office of Environmental Health and Safety(NOA)

Yi Hwa Kim, Deputy Director of Environmental Health and Safety
333 South Beaudry Avenue, 20th Floor
Los Angeles, California 90017
(213) 241-3199

City of Lynwood(NOA)

Jonathan Colin, Director of Development Services
Development Services
11330 Bullis Road
Lynwood, California 90262
(310) 603-0220

Lynwood Unified School District(NOA)

Sally Seko, Assistant Superintendent / Federal & State Programs
11321 Bullis Road
Lynwood, California 90262
(310) 886-1695

Park Water Company(NOA)

Janelle Rellosa, Assistant Civil Engineer
Central Basin Division
9750 Washburn Road
Downey, California 90241
(562) 923-0711

South Coast Air Quality Management District[*(CD)]

Ian MacMillan, Program Supervisor, CEQA Inter-Governmental Review
Planning Rule Development & Area Sources
21865 Copley Drive
Diamond Bar, California 91765
(909) 396-3244

Southern California Association of Governments[(CD)]

Jacob Lieb, Manager of Assessment
818 West 7th Street, 12th Floor
Los Angeles, California 90017
(213) 236-1800

12.1.4 County of Los Angeles

Chief Executive Office*[(EIR + CD)]

Jan Takata, Senior Manager
Chief Executive Office
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 754
Los Angeles, California 90012
(213) 974-1360

Sabra White, Project Analyst
Chief Executive Office
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 754
Los Angeles, California 90012
(213) 974-1140

Community Development Commission of the County of Los Angeles[(NOA)]

Christine Figueroa, Development Specialist
2 Coral Circle
Monterey Park, California 91755
(323) 890-7001

Department of Health Services[*(EIR + CD)]

Carol Meyer, Chief Network Officer
313 North Figueroa Street, Room 901
Los Angeles, California 90012
(213) 240-8101

Department of Public Health[*(EIR+CD)]

Jonathan E. Fielding, Director of Public Health and Health Officer
313 North Figueroa Street, Room 806
Los Angeles, California 90012
(213) 240-8117

Department of Public Works[*]

Andy Moey, Capital Projects Program Manager[(CD)]
Project Management Division I, Health Section II
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
(626) 300-2333

Esther Diaz, Project Manager[(CD)]
Project Management, Health Section II
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
(626) 300-2391

Bill Winter c/o Suen Fei Lau[(CD)]
Traffic and Lighting Division
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
(626) 300-4820

Mr. Jeff Pletyak[(NOA)]
Traffic and Lighting Division
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
(626) 300-4820

Mr. Isaac Wong[(NOA)]
Traffic and Lighting Division
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
(626) 300-4820

Andy Narag, Senior Civil Engineer[(NOA)]
Land Development Division
900 South Fremont Avenue, 3rd Floor
Alhambra, California 91803
(626) 458-4921

Department of Regional Planning(NOA)

Mark Child, Supervising Regional Planner
320 West Temple Street
Los Angeles, CA 90012
(213) 974-6443

Fire Department

Debbie Aguirre, Chief of Planning Division(NOA)
Administrative Services–Planning Division
1320 North Eastern Avenue
Los Angeles, California 90063
(323) 881-2404

Jim Bailey, Head Fire Prevention Engineer(NOA)
Fire Prevention Division
5823 Rickenbacker Road
Commerce, California 90040
(323) 890-4132

Scott Jaeggi, Inspector(CD)
Fire Prevention Division
Land Development Unit
5823 Rickenbacker Road
Commerce, California 90040
(323) 890-4238

Los Angeles County Arts Commission(CD)

Greg Esser, Civic Art Program Director
1055 Wilshire Boulevard, Suite 800
Los Angeles, California 90017
(213) 580-0017

Martin Luther King, Jr. Multi-Service Ambulatory Care Center*(EIR + CD)

Administration Office
Cynthia Moore-Oliver or Elaine Saafir
12021 South Wilmington Avenue
Los Angeles, CA 90059
(310) 668-5201

Metropolitan Transit Authority(CD)

Susan Chapman, Program Manager
Long Range Planning
Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, California 90012
(213) 922-6908

Office of the Los Angeles County Clerk(EIR + CD)

Environmental Filings
12400 Imperial Highway, Room 2001
Norwalk, California 90650
(562) 462-2057

Public Library(EIR + CD)

Ms. Alice Tang, Community Library Manager
Willowbrook Library
11838 South Wilmington Avenue
Los Angeles, California 90059
(323) 564-5698

Sanitation Districts of Los Angeles County(CD)

Adriana Raza
Will Serve Program
Facilities Planning Department
1955 Workman Mill Road
Whittier, California 90601
(562) 908-4288 ext. 2717

Second Supervisorial District(EIR + CD)

Mark Ridley-Thomas, Supervisor, Second District
866 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012
(213) 974-2222

Sheriff's Department(CD)

Leroy D. Baca, Sheriff
4700 Ramona Boulevard
Monterey Park, California 91754
(323) 267-4800

12.2 INTERESTED PARTIES

In addition to the parties listed above, the NOA of the EIR were mailed to 279 interested parties and 1,276 property owners within a 0.25-mile radius of the proposed project.[2]

[2] These addresses are on file at Sapphos Environmental, Inc., Pasadena, California.