

MOTION BY SUPERVISOR KATHRYN BARGER

JUNE 4, 2024

**APPROVE THE PROJECTS AND BUDGETS AND AWARD A DESIGN-BUILD CONTRACT FOR THE HIGH DESERT CRISIS RESIDENTIAL TREATMENT PROGRAM, CRISIS STABILIZATION UNIT, AND MENTAL HEALTH HUB PROJECTS**

The proposed Crisis Residential Treatment Program (CRTP), Crisis Stabilization Unit (CSU), and Mental Health Hub (MHH) on the High Desert campus are envisioned to be facilities that would allow for geographic equity and balance, as well as advancing racial equity by providing a needed resource in a community where many of the residents are disadvantaged. They are vital elements to the High Desert Campus along with the current operating High Desert Regional Health Center (HDRHC) and Mental Health Urgent Care Center (MHUCC).

As a neighbor to the current facilities in operation, the MHH would offer an expansion of the program currently housed at the HDRHC by providing extended space to allow for the hiring of additional staff. The children and youth CSU would offer a new resource to Service Area 1 Region of Los Angeles County. Meanwhile, the CRTP would be the first adult CRTP facility in the Antelope Valley and would provide services beyond what a mental health urgent care center can provide.

Both the proposed Crisis Stabilization Unit (CSU) and Mental Health Hub (MHH) would be developed under one roof as a single-story facility but due to program requirements are required to be physically separated with separate entrances. The CRTP would be developed under its own separate roof as a single-story facility. These two buildings would be blended into the High Desert campus of central Lancaster and are part of the campus master plan to meet the future growth demand for services in the region.

**Crisis Residential Treatment Program**

The proposed CRTP is a facility that can house 16 beds for adults who require services beyond what a mental health care center can provide. This CRTP would provide a short-term alternative to hospitalization and the average stay at the CRTP would be between 14 and 21 days. This CRTP would be the first of its kind in the Antelope Valley and is expected to receive 275 to 400 clients annually.

-MORE-

**MOTION**

SOLIS \_\_\_\_\_

MITCHELL \_\_\_\_\_

HAHN \_\_\_\_\_

BARGER \_\_\_\_\_

HORVATH \_\_\_\_\_

### Crisis Stabilization Unit

The continuum of care championed by the Department of Mental Health (DMH) would be exhibited through the proposed children and youth CSU being a new resource to Service Area 1 region of Los Angeles County. The nearest children and youth CSU is currently under construction and is 50 miles away from Lancaster in Sylmar at the Olive View-UCLA Medical Center campus. The CSU would provide a closer resource to residents who lack personal transportation or cannot afford to make the 50-mile commute to Sylmar. In addition, the CSU would be an alternative to emergency room visits and hospitalization. A minimum of 2,920 individuals would be seen annually at the proposed CSU.

### Mental Health Hub

DMH is committed to protecting the health and well-being of our community in Los Angeles County. The proposed MHH would be an expansion of the current program housed at the HDRHC. At the HDRHC's current location, 850 individuals are seen per year. The MHH would allow for an additional 2,650 individuals to be seen on an annual basis.

### Project Delivery Method

The proposed High Desert CRTP, CSU, MHH projects would be delivered through a Design-Build (D-B) project delivery method and a single D-B Contract if approved. Consistent with the Board-adopted D-B policy, a stipend would be provided to the second and third highest ranked prequalified proposers that were not selected as the best value D-B (or top three highest ranking qualified proposers if no D-B contract is awarded) with a consultant services agreement allowing the County to use the information and ideas submitted by the proposers. Upon the Board's approval, the construction of the proposed projects would begin in November 2024 and will be substantially completed in October 2025.

### Design Completion Allowance

The maximum contract sum of \$27,353,447 includes a \$834,000 design completion allowance that is intended to facilitate the resolution of issues identified during the design phase. The design completion allowance is reserved for changes required by jurisdictional agencies and other unanticipated design issues. The inclusion of the design completion allowance would facilitate the design decision process and minimize potential delays that could occur with design issues.

### Consultant Services Agreement

Upon the Board's approval, the second and third highest ranked, qualifying D-B proposers for the project will be paid a stipend of \$45,000 each pursuant to consultant services agreement, which affords the County the right to use the information and ideas submitted by the proposers.

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### CONTRACTING PROCESS

The D-B procurement was conducted in accordance with the D-B policy adopted by the Board on June 4, 2016.

On November 30, 2023, Public Works issued a Request for Proposal (RFP) for D-B services. The RFP was advertised on the County's "*Doing Business with Los Angeles County*" and the "*Do Business with Public Works*" websites and in the *Los Angeles Daily Journal*, *Los Angeles Sentinel*, *La Opinión*, *San Gabriel Valley Tribune*, *Long Beach Press Telegram*, *Daily Breeze*, *The Signal*, *World Journal (Chinese Daily News)*, *Pasadena Star News*, and *Antelope Valley Journal*. Also, Public Works informed 1,508 Local Small Business Enterprises, 163 Social Enterprises, and 144 Disabled Veteran Business Enterprises, 969 Community Business Enterprises, and 933 Community Based Organizations about this business opportunity. The first phase of the RFP process was the submittal of a prequalification questionnaire (Part A) by all interested D-B firms. On January 10, 2024, six prequalification questionnaires were received for evaluation. The prequalification questionnaires were reviewed by an evaluation committee made up of members from DMH, Chief Executive Office, and Public Works. Based on the review and evaluation of the prequalification questionnaires, three firms were determined to be qualified. In accordance with the shortlisting requirements in the RFP, the three firms were shortlisted and invited to submit technical and cost proposals (Part B) for the proposed project.

On April 17, 2024, three shortlisted D-B firms submitted technical and cost proposals for evaluation. The technical and cost proposals were evaluated by the evaluation committee members based on technical design and construction expertise, proposed delivery plans, schedule, price, life cycle costs, Countywide Community Workforce Agreement, local and targeted worker hiring program, design excellence, and design-build team personnel and organization. All three technical proposals met the intent, program, and base scope of work as defined in the final scoping documents. The Penta Building Group, LLC, in its D-B proposal was found to have submitted the best value and most advantageous proposal to perform these services under the D-B delivery method, in accordance with the evaluation criteria stated in the RFP. These evaluations were completed without regard to race, creed, color, or gender.

### FISCAL IMPACT/FINANCING

The budgets for the proposed High Desert CRTP, CSU, and MHH projects are \$21,399,000, \$10,808,000, and \$10,807,000, respectively. The projects' budgets include construction, change order contingency, plans and specifications, permit fees, consultant services, inspection services, and County services. The projects' budgets and schedules are included in Enclosure A.

The funding source for these proposed projects include \$39,694,000 in the Behavioral Health Continuum Infrastructure Project grant and \$3,320,000 in Mental Health Services Act Capital Facilities funds. Approval of the enclosed appropriation adjustment (Enclosure B) would fully fund the projects.

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### OPERATIONAL COSTS

Following completion of the projects, if approved, DMH would fund the associated maintenance and operation costs with existing budgetary resources from its operating budget.

### FACTS AND PROVISIONS/LEGAL REQUIREMENTS

In accordance with the Board's Civic Art Policy, the proposed projects' budgets include 1 percent of the design and construction costs to be allocated to the Civic Art fund (\$70,000 for MHH, \$70,000 for CSU, and \$138,000 for CRTP).

In accordance with the Board's consolidated Local and Targeted Worker Hire Policy, the projects would require that at least 30 percent of the total California craft worker hours for construction of the project be performed by Local Residents and at least ten percent be performed by Targeted Workers facing employment barriers.

The Countywide Community Workforce Agreement (CWA) with the Los Angeles/Orange Counties Building and Construction Trades Council and its respective unions was fully executed on June 7, 2023. The D-B and all its subcontractors agree to become a party to and accept the terms of the CWA.

A standard D-B contract in a form previously approved by County Counsel will be used that contains terms and conditions in compliance with the Chief Executive Office and the Board's requirements, ordinances, policies, and programs.

### ENVIRONMENTAL DOCUMENTATION

A Final Environmental Impact Report (EIR) was prepared for the High Desert Campus Master Plan project for the High Desert Health System Multi-Service Ambulatory Care Center and was certified by the Board, as lead agency under the California Environmental Quality Act (CEQA), on May 31, 2011. Findings of Fact, a Statement of Overriding Consideration, as well as a Mitigation Monitoring and Reporting Program were adopted.

Addendum No. 1 (Enclosure C) to the previously certified EIR, was prepared for the proposed High Desert CRTP, CSU, and MHH projects since some changes or additions to the EIR and previous Addenda were required as a result of the refinements to the previously approved project; however, none of the conditions described in State CEQA Guidelines Section 15162 which would require the preparation of a subsequent EIR have occurred. Preparation of an addendum was determined to be appropriate under Section 15164. There are no substantial changes to the project or to the circumstances under which the project is undertaken that require further review under CEQA.

Addendum No. 1 analyzes potential environmental effects associated with proposed changes in the project scope and includes justification that environmental impacts resulting from the currently proposed refinements to the proposed projects would not result in any new significant impacts beyond those previously identified in the EIR.

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Addendum 1 describes the project refinements to be within the parameter of the previously described scope of work contained in the previously certified EIR. The EIR described the project work occurring among two parcels known as Parcel A and Parcel B, the currently proposed refinements, which include the projects described herein, pertain to Parcel B. The scope of the project included in the EIR for Parcel B included up to 67,250 square feet of supporting County public services and commercial use including mental health services among the 6-acre Parcel B site. The currently proposed refinements included in Addendum 1, consist of two new mental health buildings of approximately 9,900 square feet each built among 4 of the 6 acres contained in Parcel B which will house the CRU, MH, and CRPT. The previously adopted Program for Reporting and Monitoring the Implementation of Environmental Impact Mitigation Measures as well as the Finding of Facts and Statement of Overriding Considerations will continue to apply to the project refinements. The required fee, if any, to the California Department of Fish and Wildlife was paid for the previously certified EIR.

The location of the documents and other materials constituting the record upon which the Board's decision is based in this matter is Public Works, Project Management Division I, 900 South Fremont Avenue, Alhambra, CA 91803. The custodian of documents and materials is Public Works, Project Management Division I, 900 South Fremont Avenue, Alhambra, CA 91803.

Approval of the directives below will certify the new Addendum No. 1 to the previously certified final EIR for the High Desert Campus Master Plan for the development of the proposed CRTP, CSU, and MHH, allow for construction of the projects at the respective budgets of \$21,399,000, \$10,808,000 and \$10,807,000, and approve the associated appropriation adjustment.

**I, THEREFORE, MOVE** that the Board of Supervisors Direct the following:

1. Certify that Addendum No. 1 to the previously certified Final Environmental Impact Report for the High Desert Health System Multi-Service Ambulatory Care Center which addresses the High Desert Crisis Residential Treatment Program, Crisis Stabilization Unit, and Mental Health Hub Projects, has been completed in compliance with the California Environmental Quality Act and reflects the independent judgment and analysis of the County; find that the Board has reviewed and considered the information contained in the Addendum together with the Final Environmental Impact Report prior to approving the proposed refinements to the projects and approve the Addendum. Upon the Board's approval of the three projects and related actions herein, Public Works will file a Notice of Determination for each of the projects with the County Clerk and with the State Clearinghouse at the Governor's Office of Planning and Research pursuant to Section 21152 of the California Public Resources Code and will post the Notice to the County's website in accordance with Section 21092.2.

-MORE-

2. Establish and approve the High Desert Crisis Residential Treatment Program project, Capital Project No. 6A019, with a total project budget of \$21,399,000.
3. Establish and Approve the High Desert Crisis Stabilization Unit project, Capital Project No. 6A020, with a total project budget of \$10,808,000.
4. Establish and approve the High Desert Mental Health Hub project, Capital Project No. 6A021, with a total project budget of \$10,807,000.
5. Approve an appropriation adjustment in the amount of \$46,334,000 to fully fund the High Desert Crisis Residential Treatment Program, High Desert Crisis Stabilization Unit, and High Desert Mental Health Hub projects.
6. Find that The Penta Building Group, LLC, is the responsive and responsible proposer that submitted the best value and most advantageous proposal to the County for design and construction of the High Desert Crisis Residential Treatment Program, Crisis Stabilization Unit, and Mental Health Hub projects using the design-build project delivery method, based on best value criteria stated in the Request for Proposals.
7. Award and delegate authority to the Director of Public Works or his designee to execute a design-build agreement with The Penta Building Group, LLC, for the design and construction of the High Desert Crisis Residential Treat Program, Crisis Stabilization Unit, and Mental Health Hub projects, for a not-to-exceed maximum contract sum of \$27,353,447, inclusive of the base sum of \$26,519,447, and he design completion allowance of \$834,000, and to suspend and/or terminate the contract for convenience, if it is in the best interest of the County to do so.
8. Authorize the Director of Public Works or his designee, with concurrence of the Chief Executive Office, to exercise control over the design completion allowance including the authority to reallocate the design completion allowance into the contract amount, as appropriate, in accordance with the project specifications.
9. Delegate authority to the Director of Public Works or his designee to execute two consultant services agreements with Abbott Construction LLC and Kemp Bros. Construction, Inc., to pay stipends in the amount of \$45,000 each to the second and third highest ranked qualified proposers that were not selected as the best value design-builder, enabling the County to use all design and construction ideas and concepts included in the proposal.
10. Authorize the Director of Department of Mental Health or her designees to contract with and direct the Internal Services Department, in coordination with Public Works, for the acquisition and installation of telephone, data, and low-voltage systems, and vendor installation of Low-Voltage Items at a total cost not to exceed \$3,000,000.

###

**CONSTRUCTION CONTRACT**  
**CONSTRUCTION MANAGEMENT CORE SERVICE AREA**  
**HIGH DESERT CRISIS RESIDENTIAL TREATMENT PROGRAM,**  
**CRISIS STABILIZATION UNIT, AND**  
**MENTAL HEALTH HUB PROJECTS**  
**ESTABLISH AND APPROVE CAPITAL PROJECTS**  
**APPROVE PROJECT BUDGETS**  
**APPROVE APPROPRIATION ADJUSTMENTS AND**  
**AWARD DESIGN-BUILD CONTRACT**  
**SPECS. 7939; CAPITAL PROJECT NO. 6A019**  
**SPECS. 7938; CAPITAL PROJECT NO. 6A020**  
**SPECS. 7937; CAPITAL PROJECT NO. 6A021**  
**FISCAL YEAR 2023-24**  
**(SUPERVISORIAL DISTRICT 5)**  
**(4 VOTES)**

**CRISIS RESIDENTIAL TREATMENT PROGRAM PROJECT**

**I. PROJECT SCHEDULE**

<b>Project Activity</b>	<b>Scheduled Completion Date</b>
Construction Documents	September 2024
Jurisdictional Approvals	October 2024
Construction Start	November 2024
Substantial Completion	October 2025
Final Acceptance	November 2025

**II. PROJECT BUDGET SUMMARY**

<b>Project Activity</b>	<b>Budget</b>
Hard Costs	
Construction (Design Build)	\$11,934,000
Contingency	\$ 3,227,000
Design Completion Allowance	\$ 414,000
Alternate 1	\$ 863,000
Stipend	\$ 45,000
Construction Subtotal	\$16,483,000
Civic Art	\$ 138,000
<b>Hard Costs Subtotal</b>	<b>\$16,621,000</b>
Soft Costs	
Plans and Specification (Scoping)	\$ 225,000
Consultant Services	\$ 193,000
Miscellaneous Expenditure	\$ 35,000
Jurisdictional Review, Plan Check/Permits	\$ 562,000
County Services	\$ 3,763,000
<b>Soft Costs Subtotal</b>	<b>\$ 4,778,000</b>
<b>TOTAL</b>	<b>\$21,399,000</b>

**CRISIS STABILIZATION UNIT PROJECT****III. PROJECT SCHEDULE**

<b>Project Activity</b>	<b>Scheduled Completion Date</b>
Construction Documents	September 2024
Jurisdictional Approvals	October 2024
Construction Start	November 2024
Substantial Completion	October 2025
Final Acceptance	November 2025

**IV. PROJECT BUDGET SUMMARY**

<b>Project Activity</b>	<b>Budget</b>
Hard Costs	
Construction (Design Build)	\$ 6,050,000
Contingency	\$ 1,637,000
Design Completion Allowance	\$ 210,000
Alternate 1	\$ 432,000
Stipend	\$ 23,000
Construction Subtotal	\$ 8,352,000
Civic Art	\$ 70,000
<b>Hard Costs Subtotal</b>	<b>\$ 8,422,000</b>
Soft Costs	
Plans and Specification (Scoping)	\$ 113,000
Consultant Services	\$ 102,000
Miscellaneous Expenditure	\$ 18,000
Jurisdictional Review, Plan Check/Permits	\$ 276,000
County Services	\$ 1,877,000
<b>Soft Costs Subtotal</b>	<b>\$ 2,386,000</b>
<b>TOTAL</b>	<b>\$10,808,000</b>



June 4, 2024

**MENTAL HEALTH HUB PROJECT****I. PROJECT SCHEDULE**

<b>Project Activity</b>	<b>Scheduled Completion Date</b>
Construction Documents	September 2024
Jurisdictional Approvals	October 2024
Construction Start	November 2024
Substantial Completion	October 2025
Final Acceptance	November 2025

**II. PROJECT BUDGET SUMMARY**

<b>Project Activity</b>	<b>Budget</b>
Hard Costs	
Construction (Design Build)	\$ 6,050,000
Contingency	\$ 1,637,000
Design Completion Allowance	\$ 210,000
Alternate 1	\$ 432,000
Stipend	\$ 22,000
Construction Subtotal	\$ 8,351,000
Civic Art	\$ 70,000
<b>Hard Costs Subtotal</b>	<b>\$ 8,421,000</b>
Soft Costs	
Plans and Specification (Scoping)	\$ 113,000
Consultant Services	\$ 102,000
Miscellaneous Expenditure	\$ 18,000
Jurisdictional Review, Plan Check/Permits	\$ 276,000
County Services	\$ 1,877,000
<b>Soft Costs Subtotal</b>	<b>\$ 2,386,000</b>
<b>TOTAL</b>	<b>\$10,807,000</b>

June 04, 2024

COUNTY OF LOS ANGELES

**REQUEST FOR APPROPRIATION ADJUSTMENT**

DEPARTMENT OF MENTAL HEALTH

**AUDITOR-CONTROLLER:**

THE FOLLOWING APPROPRIATION ADJUSTMENT IS DEEMED NECESSARY BY THIS DEPARTMENT. PLEASE CONFIRM THE ACCOUNTING ENTRIES AND AVAILABLE BALANCES AND FORWARD TO THE CHIEF EXECUTIVE OFFICER FOR HER RECOMMENDATION OR ACTION.

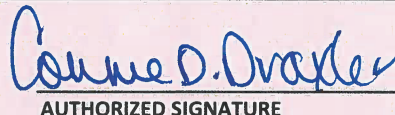
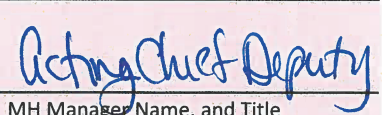
**ADJUSTMENT REQUESTED AND REASONS THEREFORE****FY 2023-24****4 - VOTES****SOURCES****USES**

BA DETAIL - SEE ATTACHMENT PAGE 1

BA DETAIL - SEE ATTACHMENT PAGE 1

**SOURCES TOTAL****\$ 46,334,000****USES TOTAL****\$ 46,334,000****JUSTIFICATION**

Reflects a total increase of \$43,014,000 in appropriation with \$21,399,000 for the High Desert Crisis Residential Treatment Program, C.P. No.6A019; \$10,808,000 for the High Desert Crisis Stabilization Unit, C.P. No.6A020; and \$10,807,000 for the High Desert Mental Health Hub, C.P. No.6A021; offset by \$39,694,000 of the Behavioral Health Continuum Infrastructure Project grant and \$3,320,000 decrease of obligated fund balance for MHSA funds, to fully fund these projects.

**ADOPTED**BOARD OF SUPERVISORS  
COUNTY OF LOS ANGELES  
84-A June 4, 2024 

AUTHORIZED SIGNATURE

MH Manager Name, and Title

BOARD OF SUPERVISOR'S APPROVAL (AS REQUESTED/REVISED)

EDWARD YEN  
EXECUTIVE OFFICERREFERRED TO THE CHIEF  
EXECUTIVE OFFICER FOR---☐ ACTION☒ RECOMMENDATIONAndrea  
TurnerDigitally signed by  
Andrea Turner  
Date: 2024.05.29  
14:42:23 -07'00'☒ APPROVED AS REQUESTED☐ APPROVED AS REVISED

CHIEF EXECUTIVE OFFICER

BY

Amir Alam

Digitally signed by  
Amir Alam  
Date: 2024.05.29  
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B.A. NO. 249

DATE 5/29/24

DATE 5/29/24

COUNTY OF LOS ANGELES  
REQUEST FOR APPROPRIATION ADJUSTMENT

FY 2023-24  
4 - VOTES

SOURCES

USES

MENTAL HEALTH SERVICES ACT (MHSA) FUND  
BT1-304M  
COMMITTED FOR CAPITAL FACILITIES & TECHNOLOGICAL NEEDS  
**DECREASE OBLIGATED FUND BALANCE 3,320,000**

MENTAL HEALTH SERVICES ACT (MHSA) FUND  
BT1-MH-6100-41189  
OTHER FINANCING USES  
**INCREASE APPROPRIATION 3,320,000**

MENTAL HEALTH  
High Desert Crisis Residential Treatment Program  
A01-CP-88-882D-65039-6A019  
STATE-BEHAVIORAL HLTH CONTINUUM INFRASTRUCTURE PRGM-CAP PROJ  
**INCREASE REVENUE 19,747,000**

MENTAL HEALTH  
High Desert Crisis Residential Treatment Program  
A01-CP-6014-65039-6A019  
CAPITAL ASSETS - B & I  
**INCREASE APPROPRIATION 21,399,000**

MENTAL HEALTH  
High Desert Crisis Residential Treatment Program  
A01-CP-96-9919-65039-6A019  
OPERATING TRANSFERS IN - CAPITAL PROJECTS  
**INCREASE REVENUE 1,652,000**

MENTAL HEALTH  
High Desert Crisis Stabilization Unit  
A01-CP-6014-65039-6A020  
CAPITAL ASSETS - B & I  
**INCREASE APPROPRIATION 10,808,000**

MENTAL HEALTH  
High Desert Crisis Stabilization Unit  
A01-CP-88-882D-65039-6A020  
STATE-BEHAVIORAL HLTH CONTINUUM INFRASTRUCTURE PRGM-CAP PROJ  
**INCREASE REVENUE 9,974,000**

MENTAL HEALTH  
High Desert Crisis Stabilization Unit  
A01-CP-96-9919-65039-6A020  
OPERATING TRANSFERS IN - CAPITAL PROJECTS  
**INCREASE REVENUE 834,000**

MENTAL HEALTH  
High Desert Mental Health Hub  
A01-CP-6014-65039-6A021  
CAPITAL ASSETS - B & I  
**INCREASE APPROPRIATION 10,807,000**

MENTAL HEALTH  
High Desert Mental Health Hub  
A01-CP-88-882D-65039-6A021  
STATE-BEHAVIORAL HLTH CONTINUUM INFRASTRUCTURE PRGM-CAP PROJ  
**INCREASE REVENUE 9,973,000**

MENTAL HEALTH  
High Desert Mental Health Hub  
A01-CP-96-9919-65039-6A021  
OPERATING TRANSFERS IN - CAPITAL PROJECTS  
**INCREASE REVENUE 834,000**

**SOURCES TOTAL \$ 46,334,000**


**USES TOTAL \$ 46,334,000**

BA249  
5/29/24

**ADOPTED**

BOARD OF SUPERVISORS  
COUNTY OF LOS ANGELES

84-A June 4, 2024

  
EDWARD YEN  
EXECUTIVE OFFICER

**ADDENDUM**  
**FINAL ENVIRONMENTAL IMPACT REPORT**  
**COUNTY OF LOS ANGELES**  
**HIGH DESERT HEALTH SYSTEM**  
**MULTI-SERVICE AMBULATORY CARE CENTER**  
**(SCH NO. 2010051005)**

**2023 PARCEL B REVISIONS**  
**CRISIS RESIDENTIAL TREATMENT PROGRAM**  
**CRISIS STABILIZATION UNIT**  
**MENTAL HEALTH HUB**

**Prepared for:**

County of Los Angeles  
Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803

**Prepared by:**

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**November 2023**

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### **Appendix**

A – HDHS MACC Project Design Features and Regulatory Requirements

B – High Desert Health System Multi-Service Ambulatory Care Center; 2023 Parcel B Revisions - Traffic Impact Analysis Update

# 1. INTRODUCTION

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## A. BACKGROUND

### History

The former High Desert Multi-Service Ambulatory Care Center (MACC), which included approximately 206,000 square feet of building space, was located at 44900 60th Street West in the City of Lancaster and was initially opened in July 2003 through the conversion of the inpatient High Desert Hospital (which was built in 1962) into an outpatient MACC facility. This facility closed in 2015/2016. The County of Los Angeles (County) determined that the age, condition, and configuration of the High Desert MACC and its remote location were not conducive to the efficient delivery of healthcare services to meet the needs of the Antelope Valley. Rather than upgrade the existing High Desert MACC at significant cost and disruption to ongoing services, it was determined that the capital investment into healthcare facilities of the Antelope Valley would be better utilized with the development of a new High Desert MACC closer to its service population and to public transportation.

### **2011 High Desert Health System (HDHS) Multi-Service Ambulatory Care Center (MACC) Final EIR (Final EIR)**

The Los Angeles County Board of Supervisors (Board), acting on behalf of the County, certified on May 31, 2011, the High Desert Health System (HDHS) Multi-Service Ambulatory Care Center (MACC) Final EIR (Final EIR), State Clearinghouse Number 2010051005.

The name of the project was changed to the High Desert Regional Health Center before the facility opened; this new facility opened in early 2016. However, this Addendum continues to use the original name so that continuity of environmental documentation is clear.

The Final EIR is comprised of the Draft EIR, Appendices, and Responses to Comments and Errata. In taking action on the 2011 HDHS MACC, the Board did the following:

- Determined that the Final EIR was completed in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000, et seq.), pursuant to Section 15090 of the *State CEQA Guidelines*.
- Made Findings for each of the significant effects and alternatives identified in the EIR.

- Adopted a mitigation and monitoring reporting program pursuant to Section 15091, determined in a statement of overriding considerations that the project benefits outweigh the project's unavoidable adverse environmental impacts,
- Approved the project (i.e., the High Desert Health System Multi-Service Ambulatory Care Center which included associated facilities on two parcels – Parcel A and Parcel B) pursuant to Sections 15092 and 15093 of the *State CEQA Guidelines*.

A Notice of Determination for the 2011 HDHS MACC and EIR was filed with the County Clerk and State Clearinghouse on June 6, 2011, and September 15, 2011, respectively.

The Final EIR analyzed High Desert Health System (HDHS) Multi-Service Ambulatory Care Center (MACC) which included associated facilities on two parcels – Parcel A and Parcel B, herein referred to as “2011 HDHS MACC.”

The HDHS MACC 21-acre project site is located in the City of Lancaster within the center of the of the Antelope Valley in the northern portion of Los Angeles County, and approximately 70 miles north of downtown Los Angeles. The project site is located on East Avenue I between 3rd Street East and 5th Street East. Regional access to the site is provided by State Route (SR) 14 (i.e., the Antelope Valley Freeway), which is located approximately 2.5 miles to the west and accessed via East Avenue I. Local access to the site is provided by numerous roadways, including East Avenue I, 3rd Street East, 4th Street East, 5th Street East, East Avenue H-13, and East Avenue H-14. Parcel B is located approximately 60 feet south of duplex homes across E. Avenue H 14 and about 90 feet west of single-family homes across 5<sup>th</sup> Street E (with one property identified as an elderly care facility).

The project evaluated in the Final EIR included construction in two phases:

1. Construction of a new, approximately 142,000-square-foot (sf) HDHS MACC (including 121,00 square foot two-story ambulatory care center, 15,500 square foot one-story materials management building/central plant building and 5,500 square foot one-story crafts building) on Parcel A (approximately 15 acres) and associated surface parking, landscaping and utility infrastructure. Utility infrastructure included new water and sewer infrastructure off-site in 3<sup>rd</sup> Street East and East Avenue I, sewer abandonment in East Avenue H-14, Raystack Avenue and the old alignment of 3<sup>rd</sup> Street East, new storm drainage facilities that would connect to off-site drains around the site, abandonment of gas lines in East Avenue H-14 and the old alignment of 3<sup>rd</sup> Street East, abandonment of overhead electrical lines and power poles along the alley between East Avenue H-13 and East Avenue H-14 as well as overhead lines extending north along the alley, and new electrical connections including to a proposed line on 3<sup>rd</sup> Street East.



2. Construction of approximately 67,250 sf of supporting public service/commercial uses on Parcel B (approximately 6 acres). The specific uses on Parcel B were not defined but were anticipated to be complementary to the outpatient services provided at the HDHS MACC and were identified as potentially including uses such as doctor's offices, senior care services, mental health services, and/or a café. Parcel B was anticipated to also include a minimum of 269 parking spaces.

Construction on Parcel A was scheduled for 20 months beginning in 2012; while the specifics of development on Parcel B were not identified, for purposes of analysis it was assumed construction would start in 2013 and would extend for 16 months with completion in 2014.

The 2011 HDHS MACC and anticipated development of both Parcels A and B are discussed in more detail in **Section 2**.

The Board determined, based on the Final EIR, that the 2011 HDHS MACC would have the following types of impacts: Less than significant (no mitigation required), potentially significant before mitigation but reduced to less than significance with mitigation, significant even with mitigation (see discussion of Findings below for summary of specific impacts in each category).

The Board approval package for the Final EIR addressed approval of the proposed project for both Parcels A and B and included a Mitigation Monitoring and Reporting Program (MMRP), the CEQA Findings and Facts in Support of Findings for the Final EIR (Findings), and a Statement of Overriding Considerations.

## **Mitigation Monitoring and Reporting Plan**

The MMRP, prepared pursuant to PRC Section 21081.6 and *State CEQA Guidelines* Section 15097, identified the mitigation timing, party responsible for implementing each mitigation measure; and the party responsible for monitoring (in all cases, the County of Los Angeles Department of Public Works with input from others for a few).

## **CEQA Findings and Facts**

The 2014 Board approval included the Findings, pursuant to PRC Section 21081 and *State CEQA Guidelines* Section 15091 and provided specific information regarding the significant environmental effects associated with the 2011 HDHS MACC. The document identified three possible findings, as follows, and rationale for each finding:

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

2. Such changes or alterations were within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes were adopted by such other agency or could and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision for employment opportunities for highly trained workers, made infeasible the mitigation measures or project alternatives identified in the Final EIR.

The Findings provided evidence to support the findings, identified significant effects that cannot be mitigated to below the level of significance, and provided findings for each of the alternatives considered in the Final EIR. The Findings identified the following impacts:

**No impact or less than significant requiring no mitigation:** aesthetics (scenic vistas, scenic resources in a State scenic highway, visual character during construction, light and glare during construction); air quality (Plan conformance, violate standards [all construction emissions and operational VOC, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>2.5</sub>], cumulative increases [all construction emissions and operational VOC and NO<sub>x</sub>], sensitive receptors, odors); agriculture (conversion of farmland, Williamson Act and agricultural zoning, zoning for forest land and timber land, loss of forest land, indirect farmland and forest land conversion); biological resources (sensitive species operation, riparian habitat, wetlands, wildlife movement during construction, conflict with plans and ordinances, conflict with conservation plans); cultural resources (historic resources); geology and soils (fault rupture, landslides, soil erosion during operation, use of alternative wastewater disposal system); hazards and hazardous materials (transport during operation, upset and accident, proximity to schools, government lists, vicinity of airport or air strip, interfere with adopted emergency response, wildland fires); hydrology and water quality (water quality or waste discharge, wastewater treatment requirements, alteration of drainage resulting in erosion or flooding, exceed storm drain capacity, degrade water quality, housing in flood zone, impede or redirect flood, flooding and inundation, seiche, tsunami and mud flow); land use (division of communities, conflict with plans, conflict with conservation plans), mineral resources (loss of resources); noise (vibration, airport and airstrip noise); population, housing and employment (substantial population growth, displace housing or people); public services (fire protection, police protection, schools, other public facilities); recreation (increased use of facilities, new or expanded facilities); transportation (circulation plans, congestion management, air traffic patterns, traffic hazards, emergency access, alternative transportation plans during operation).

**Potentially significant impacts but reduced to less than significant with mitigation:** aesthetics (operation – visual character and light and glare); biological resources (construction – sensitive species, wildlife movement); cultural resources (archaeological, paleontological, human remains); geology and soils (seismic ground shaking, seismic-related ground failure, unstable geologic unit, expansive soils,

construction-related soil erosion); hazards and hazardous materials (construction -- transport, use or disposal of hazardous materials); noise (exceed standards, substantial increase in ambient noise levels both temporary from construction and permanent on project occupants from traffic); transportation and traffic (construction – transportation plans and programs due to relocation of bus stop); utilities (water and wastewater treatment facilities, groundwater supplies or recharge, stormwater drainage, wastewater treatment capacity, landfill capacity, solid waste regulations, electric, natural gas and communication facilities). Feasible mitigation was identified to reduce these effects to levels considered less than significant.

**Significant even after mitigation:** air quality (operation -- violation of standards for PM10 and CO and cumulative increases in PM10 and CO); greenhouse gasses (total emissions and conflict with plan, policy or regulation to reduce GHG emissions, cumulative impact); utilities and service systems (cumulative impact on water supply).

## **Statement of Overriding Considerations**

Effects that could not be reduced to less-than-significant levels were addressed in the Statement of Overriding Considerations. For these significant and unavoidable impacts identified in the Findings the Board determined that economic, legal, social, technological, and other considerations for the 2011 HDHS MACC outweighed the significant and unavoidable impacts. The Statement of Overriding Considerations identified the following specific benefits the Board considered in its decision to approve the project:

1. Development of the proposed 2011 HDHS MACC would provide a more centrally located outpatient medical facility to better serve the HDHS MACC's service population, with convenient access to public transportation.
2. The proposed 2011 HDHS MACC would result in improved quality and efficiency of medical services compared the [then in 2011] existing HDHS MACC or a rehabilitated HDHS MACC and provide a facility large enough to accommodate the anticipated clinic visitation.
3. Development of the 2011 HDHS MACC Project, primarily Parcel B development, would create employment generating opportunities for the citizens of the Lancaster area and surrounding communities. The project (Parcels A and B) is anticipated to add approximately 167 permanent jobs to the local economy, as well as short-term construction related employment.
4. Development of Parcel B with complementary public service/commercial uses would maximize utilization of the site and provide additional efficiencies in receiving medical, or medical-related, care at a single location.

5. The 2011 HDHS MACC project would assist in the revitalization of the Piute neighborhood.
6. Parcel B development on the 2011 HDHS MACC site would provide for an income stream into the County to offset general fund needs.

## **Other Approvals and Environmental Review**

On July 9, 2019, the County Board of Supervisors approved the High Desert Mental Health Urgent Care Center (HDMHUCC) project. The project was constructed over the course of 9 months and opened in July 2021. The HDMHUCC is located on the southern one-third of Parcel B. The HDMHUCC provides much needed 24/7 urgent mental health and crisis stabilization services to severely and persistently mentally ill adults and seriously emotionally disturbed children, adolescents, and their families in the Lancaster area. These mental health services include, but are not limited to, diagnosis, evaluation, treatment, referrals, consultation, community services, crisis intervention/ stabilization, medication support, and case management. The HDMHUCC includes approximately 9,900- square-foot of building area, a surface parking lot, an ambulance drive, and landscaping improvements. The building provides nurse stations, therapy rooms, seclusion rooms, and offices for the health providers.

The Board found this project to be exempt from CEQA [*State CEQA Guidelines* Sections: New Construction or Conversion of Small Structures – 15303 (c) and (d); Minor Alterations to Land – 15304 (a) and (b); Accessory Structures – 15311 (a) and (b) and Los Angeles County Environmental Document Reporting Procedures and Guidelines, Appendix G: Class 1 (n), Class 3 (a) and (d); Class 4 (a) and (c); and Class 11 (d) and (f)].

## **B. PURPOSE OF THIS ADDENDUM**

The purpose of this Addendum to the Final EIR is to provide analysis and to document that the mental health facilities proposed for Parcel B (2023 Parcel B Revisions) would not result in substantial changes to the project or to the circumstances under which it is being undertaken due to any significant environmental impacts that were not identified in the original 2011 HDHS MACC EIR or result in substantially more severe environmental effects. This document has been prepared in accordance with CEQA, specifically *State CEQA Guidelines* (Title 14, Cal. Code Regs., 15000 et seq.) Sections 15162 and 15164. The currently proposed 2023 Parcel B Revisions would provide additional mental health facilities on approximately four acres of Parcel B:

1. 9,900 square foot adult (18 and older) Crisis Residential Treatment Program (CRTP) building; and

2. 9,900 square foot building divided equally between a Children's Mental Health (MH) Hub and Children's Crisis Stabilization Unit (CSU).

## **C. CEQA REQUIREMENTS**

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

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

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

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
  - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration.
  - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR.

- C. Mitigation measures or alternatives previously determined not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternative.
- D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

- (a) The Lead or Responsible Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:
  - (1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
  - (2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

A supplement to an EIR may be distinguished from a subsequent EIR by the following: a supplement augments a previously certified EIR to the extent necessary to address the conditions described in section 15162 and to examine mitigation and project alternatives accordingly. It is intended to revise the previous EIR through supplementation. A subsequent EIR, in contrast, is a complete EIR, which focuses on the conditions described in section 15162.

The currently proposed 2023 Parcel B Revisions are described in **Section 2** of this Addendum and would be within the assumptions for construction and operation analyzed in the 2011 HDHS MACC EIR. The currently proposed 2023 Parcel B Revisions have been reviewed by the County in light of Sections 15162 and 15163 of the *State CEQA Guidelines*. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified Final EIR is the appropriate environmental documentation under CEQA for the currently proposed 2023 Parcel B Revisions. **Section 3** discusses issue-by-issue how the impacts anticipated for the currently proposed 2023 Parcel B Revisions would be within those previously identified in the Final EIR. The Mitigation Monitoring and Reporting Program (MMRP) adopted with the Final EIR would continue to apply to the currently proposed 2023 Parcel B Revisions to ensure that all significant impacts are mitigated to the extent feasible

and those that can be reduced to a less than significant level remain less than significant where it is feasible to mitigate such impacts.

## **D. REVISIONS TO STATE CEQA GUIDELINES**

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

## **E. ADOPTED MITIGATION MEASURES**

The Final EIR identifies mitigation measures that would reduce the significant and potentially significant impacts of the 2011 HDHS MACC where feasible. These mitigation measures were adopted and included in a Mitigation Monitoring and Reporting program (MMRP) as part of the 2011 HDHS MACC approval process and are listed in **Table 1**. No changes are necessary or are proposed to the measures as adopted. These mitigation measures will continue to be implemented as applicable and appropriate to the revised activities that are the subject of this Addendum.

In addition to these mitigation measures, the Final EIR identified selected Project Design Features and Regulatory requirements (see **Appendix A** of this addendum) that would be relevant to some (but not all) of the issue areas.

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**Table 1**  
**Adopted Mitigation Measures**

<b>Issue Areas</b>	<b>Mitigation Measures</b>
<b>Aesthetics</b>	<p><b>MM 4.1-1:</b> The architectural style of the supporting public service/commercial development (Parcel B) shall be designed to complement the HDHS MACC (Parcel A) and provide a coherent development style for the entire project site. This would be assured by review of final site plans and specifications for Parcel B in relationship to Parcel A development prior to Parcel B plan approval.</p> <p><b>MM 4.1-2:</b> If it is determined, based on the future site plans for Parcel B, that vehicle headlights have the potential to be directed toward adjacent single-family homes, a visual barrier shall be provided along East Avenue H-14 and/or along 5th Street East to block light from vehicle headlights. The barrier may be a block wall, berm, or dense shrub/vegetation that will be of sufficient height and density to prevent the passage of light into adjacent residences.</p> <p><b>MM 4.1-3:</b> All structures on both Parcel A and Parcel B shall utilize non-reflective building materials unless the location, direction, and/or size of use of a reflective material can be conclusively demonstrated by the Project Engineer and/or Architect not to cause glare. Non-reflective materials may include, but not be limited to, low reflectivity glass, concrete, masonry materials (e.g., brick, stone, and stucco), and brushed metals. The final plans and specifications shall not be approved by</p>

Issue Areas	Mitigation Measures
	<p>the County unless it can be demonstrated by the Project Engineer and/or Architect that the project would not cause glare that would result in unsafe traffic conditions and/or nuisance for On-site and surrounding viewers. The County shall be responsible for verifying in the field the use of materials on the project site after construction and requiring, if determined necessary, that any reflective building materials be replaced with non-reflective materials.</p>
<b>Air Quality</b>	<p><b>MM 4.2-1:</b> The County shall promote ride-sharing programs for HDHS MACC employees and County employees at Parcel B. Accommodations for such programs may include providing parking spaces for the ride-share vehicles at convenient locations and providing a website or message board for coordinating rides.</p>
<b>Biological Resources</b>	<p><b>MM 4.3-1:</b> Prior to commencement of grading activities, the County shall verify that the following note is included on the contractor specifications, which ensures compliance with the Migratory Bird Treaty Act: "To avoid impacts on nesting birds, the vegetation on the project site should be cleared between September 1 and January 31. If vegetation clearing occurs inside the peak nesting season (between February 1 and August 31), a pre-construction survey (or possibly multiple surveys) shall be conducted by a qualified Biologist to identify any active nesting locations. If the Biologist does not find any active nests within the impact area, the vegetation clearing/construction work will be allowed to proceed. If the Biologist finds an active nest within the construction area and determines that the nest may be impacted, the Biologist will delineate an appropriate buffer zone around the nest depending on the species and the type of construction activity. Construction activities would be prohibited in the buffer zone until the nest is abandoned. If performed, all pre-construction survey results shall be provided to the County Chief Executive Office and Department of Public Works".</p> <p><b>MM 4.3-2:</b> A pre-construction burrowing owl survey will be implemented to determine the presence or absence of this species on the project site. The survey will be conducted following currently accepted guidelines for this species (i.e., Burrowing Owl Consortium Protocol [CBOC 1993]). A qualified Biologist will survey the entire site and where possible within 500 feet of the site for the presence of any active owl burrows within 30 days prior to the onset of construction activities on both Parcel A and Parcel B. Any active burrow found during survey efforts will be mapped. If no active burrows are found, no further action is required.</p> <p>If nesting activity is present at an active burrow, the active site will be closely monitored by a qualified Biologist and protected until nesting activity has ended. Nesting activity for the burrowing owl in the region normally occurs between March 1 and August 31. To protect the active burrow, the following restrictions to construction activities will be required until the burrow is no longer active, as determined by a qualified Biologist based on site- specific biological conditions: (1) clearing limits will be established within a 500-foot buffer around any active burrow, unless otherwise determined by a qualified Biologist and (2) access and surveying will be restricted within 300 feet of any active burrow, unless otherwise determined by a qualified Biologist based on site-specific biological conditions. Any encroachment into the buffer area around the active burrow will only be allowed if the Biologist determines that the proposed activity will not disturb the nest occupants. Construction can proceed when the qualified Biologist has determined that fledglings have left the nest.</p> <p>If an active burrow is observed during the non-nesting season, then the nest site will be closely monitored by a qualified Biologist, and when the owl is away from the nest, the Biologist will either actively relocate the burrowing owl or passively relocate the burrowing owl by excavation or by preventing re- entry using one-way burrow doors. The Biologist will then remove the burrow so the burrowing owl cannot return to the burrow.</p>
<b>Cultural Resources</b>	<p><b>MM 4.4-1:</b> Should archaeological resources be found during ground disturbing activities for the HDHS MACC Project, a qualified Archaeologist shall be retained to first determine whether an archaeological resource uncovered during construction is a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code (PRC) or a "historical resource" pursuant to Section 15064.5(a) of the <i>State CEQA Guidelines</i>. If the archaeological resource is determined to be a "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a mitigation plan in consultation with the Los Angeles County Chief Executive Office that satisfies the requirements of PRC Section 21083.2 and <i>State CEQA Guidelines</i> Section 15064.5.</p> <p>If the Archaeologist determines that the archaeological resource is not a "unique archaeological resource" or "historical resource," s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal</p>



Issue Areas	Mitigation Measures
	<p>Information Center (SCCIC). The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the Los Angeles County Chief Administrative Office and to the CHRIS at the SCCIC at the California State University, Fullerton.</p> <p><b>MM 4.4-2:</b> Prior to the commencement of ground disturbing activities in native soils, a qualified Paleontologist shall be retained to monitor excavations into native soils 5 feet below ground surface or deeper (i.e., grading and excavation for footings and utility trenches), or when bedrock is encountered. The schedule and extent of monitoring activities shall be established by the Supervising Paleontologist in coordination with Contractor and County staff at the project's pre-grade meeting. It shall be the responsibility of the Supervising Paleontologist to demonstrate, to the satisfaction of the County, the appropriate level of monitoring necessary based on the on-site soils and final grading plans, when available.</p> <p>All paleontological work to assess and/or recover a potential resource at the project site shall be conducted under the direction of the qualified Paleontologist. If a fossil discovery occurs during grading operations when a Paleontological Monitor is not present, grading shall be diverted around the area until the Monitor can survey the area. Any fossils recovered during project site development, along with their contextual stratigraphic data, shall be donated to the County of Los Angeles or other appropriate institution with an educational and research interest in the materials. The Paleontologist shall prepare a report of the results of any findings as part of a testing/mitigation plan following accepted professional practice.</p> <p><b>MM 4.4-3:</b> If human remains are encountered during excavation activities, all work shall halt and the County Coroner shall be notified (California Public Resources Code [PRC] Section 5097.98). The Coroner will determine whether the remains are of forensic interest. If the Coroner, with the aid of the County-approved Archaeologist, determines that the remains are prehistoric, he/she will contact the NAHC. The NAHC will be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD will make his/her recommendation within 48 hours of being granted access to the site. The recommendation of the MLD shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code Section 7050.5). If the landowner rejects the recommendations of the MLD, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (PRC Section 5097.98).</p>
<b>Geology and Soils</b>	<p><b>MM 4.5-1:</b> Prior to the issuance of a grading permit for both Parcel A and Parcel B, the County of Los Angeles Department of Public Works shall review the Geotechnical Investigation Report, County of Los Angeles High Desert Health System (URS 2010a) and Seismic Hazard Analysis &amp; Development of Response Spectra for the County of Los Angeles High Desert Health System Multi-Service Ambulatory Care Center (URS 2010b), and any and all additional geotechnical reports prepared for the project site, and confirm that all geotechnical recommendations provided in it have been fully and appropriately incorporated into the site preparation and building design specifications for both Parcel A and Parcel B.</p>
<b>Greenhouse Gas Emissions</b>	<p><b>MM 4.6-1:</b> Final plans for the HDHS MACC Project (Parcel A and Parcel B) shall include the following features to the satisfaction of the Los Angeles County Department of Public Works:</p> <ul style="list-style-type: none"> <li>• Light-emitting diode (LED) lights or similar energy-efficient lighting shall be used for parking lot lights and other outdoor lighting;</li> <li>• Facilities for the collection of recyclable materials shall be included within the buildings of Parcel A and B, consistent with the recycling requirements of the City and local waste collection contractor.</li> </ul>
<b>Hazards and Hazardous Materials</b>	<p><b>MM 4.7-1:</b> Prior to any site activities that could disrupt existing polychlorinated biphenyls (PCBs), the Los Angeles County Department of Public Works shall coordinate with Southern California Edison, the entity responsible for removing the PCBs, to facilitate compliance with all applicable requirements during the use, removal, relocation, and/or servicing of the existing transformers during project construction.</p>

Issue Areas	Mitigation Measures
Noise	<p><b>MM 4.9-1:</b> Grading plans and specifications for the HDHS MACC Project (Parcel A and Parcel B) shall include temporary noise barriers to meet the 75 A-weighted decibels Lmax noise standard from nonscheduled, intermittent, short-term (less than 30 days) use of mobile construction equipment. The noise barriers shall be installed between grading areas and the nearest sensitive receptors (residential land uses to the north and east) and be no less than 12 feet high, solid from the ground to the top of the barrier, and have a weight of at least 2.5 pounds per square foot, which is equivalent to 3/4-inch-thick plywood.</p> <p><b>MM 4.9-2:</b> During construction of the HDHS MACC Project (Parcel A and Parcel B), the operation of stationary equipment (e.g. compressors, generators, tower cranes) in operation for more than 10 consecutive days and within a distance of between 115 feet and 630 feet from an occupied home or operating hospital, shall include noise equipment silencers and noise reduction measures (e.g. enclosures, curtains or other devices placed between the equipment and the nearest homes) to limit the equipment noise at the nearest residences to 60 A weighted decibels Lmax or below. No stationary equipment shall be operated within 115 feet from a noise sensitive use. To be effective, commercial-grade enclosures/noise curtains must completely break the line-of-sight between the noise source and the receptors, must be sizable enough to cover the entire noise source, and must be free of degrading holes or gaps.</p> <p><b>MM 4.9-3:</b> All construction trucks and vehicles for the HDHS MACC Project (Parcel A and Parcel B) shall travel to and from the project site via East Avenue I, and no construction traffic or queuing shall be allowed on 3rd Street East north of project site, 5th Street East, or East Avenue H-14.</p> <p><b>MM 4.9-4:</b> Prior to the construction of parking lot lighting within the HDHS MACC Project site (Parcel A and Parcel B) that may contain wind turbines, an acoustical study shall be prepared to demonstrate whether the noise from all planned wind turbines would exceed the AWEA and the State of California guidelines that limit noise from small turbines to 60 A-weighted decibels (dBA) or not in excess of 5 dBA above the background noise, whichever is greater, at the closest inhabited dwelling. If the acoustical study shows that mitigation is required in order to meet AWEA standards, measures could include alternate equipment selection, siting of wind turbines as far as practicable from existing homes, reduction in the number of wind turbines, avoidance of siting wind turbines upwind from existing homes, and/or other similarly effective measures, or elimination of the wind turbines from the project.</p> <p><b>MM 4.9-5:</b> Interior areas at the HDHS MACC Project (Parcel A and Parcel B) shall be designed to ensure that interior noise levels from exterior transportation sources shall not exceed 50 A-weighted decibels Community Noise Equivalent Level.</p>
Transportation/Traffic	<p><b>MM 4.12-1:</b> The bus stop located on East Avenue I and 5th Street East shall be temporarily relocated during construction activities to a location subject to review and approval by the City and the Antelope Valley Transit Authority (AVTA). Notification of the temporary stop shall be provided at the existing bus stop site and at the relocated bus stop, and the AVTA shall provide advance notification to the bus drivers.</p>

*Source: 2011 County of Los Angeles High Desert Health System Multi-Service Ambulatory Care Center Final EIR and Mitigation Monitoring and Reporting Program*

## F. SUMMARY COMPARISON OF SIGNIFICANT IMPACTS IDENTIFIED IN FINAL EIR COMPARED TO IMPACTS OF PROPOSED 2023 PARCEL B REVISIONS

Unavoidable significant adverse environmental impacts identified for the Final EIR are as follows: Air Quality (operational direct emissions and contribution to cumulative), Greenhouse Gas Emissions (operational [including amortized construction] contribution to cumulative), Utilities (operational

contribution to cumulative demand for water supply). Conservatively, these same impacts continue to be identified as significant with the 2023 Parcel B Revisions, despite regulatory controls that reduce emissions, water conservation and the application of mitigation measures. Other impacts analyzed in the Final EIR were determined to be less than significant (see **Table 3** below for a summary comparison of all impacts analyzed in the Final EIR compared to impacts of the proposed 2023 Parcel B Revisions). As discussed in the detailed analyses below, the mitigation measures identified in the Final EIR would reduce impacts to a less than significant level for the same issues that are reduced to a less than significant level in the Final EIR.

## **G. INCORPORATION BY REFERENCE**

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

1. County of Los Angeles, High Desert health System, Multi-Service Ambulatory Care Center, certified Final Environmental Impact Report, certified May 31, 2011. Referred to herein as the Final EIR.
2. County of Los Angeles High Desert Mental Health Urgent Care Center requests for Board Action on approval of the construction contract and budget. Project was approved July 9, 2019; construction contract and funding changes were approved November 19, 2019.
3. Grant Application, LA County High Desert CRTP & Children and Youth CSU/HUB, January 13, 2023.

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

## **H. SUMMARY OF EFFECTS**

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

## **2. DESCRIPTION OF CURRENTLY PROPOSED PROJECT**

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### **A. PROJECT LOCATION**

The approximate 21-acre project site is located in the City of Lancaster within the center of the Antelope Valley, in the northern portion of Los Angeles County, and approximately 70 miles north of downtown Los Angeles (see **Figures 1 and 2**). The area is bound by the Tehachapi Mountains to the northwest and the foothills of the San Gabriel Mountains to the southwest. Immediately south of Lancaster is the City of Palmdale; the developing community of Rosamond in Kern County is located several miles to the north; the lands to the east and west of the City of Lancaster are unincorporated County lands that are in agricultural or rural residential use or are undeveloped land.

The project site is comprised of two parcels A and B, located on East Avenue I between 3rd Street East and 5th Street East. Regional access to the site is provided by State Route 14 (SR-14), also known as the Antelope Valley Freeway, located approximately 2.5 miles to the west via East Avenue I. Local access to the site is provided by numerous roadways, including East Avenue I, 3rd Street East, 4th Street East, 5th Street East, East Avenue H-13, and East Avenue H-14.

The 2023 Parcel B Revisions only affect Parcel B (see **Figures 4 and 5**).

### **B. 2011 HIGH DESERT HEALTH SYSTEM (HDHS) MULTI SERVICE AMBULATORY CARE CENTER (MACC) ANALYZED IN THE FINAL EIR**

**Figure 3** shows the site plan for the MACC analyzed in the Final EIR. The Final EIR (page 3-14) identified the following objectives of the 2011 HDHS MACC:

1. To support the goals and policies of the County General Plan, including the following: (1) maximize individual and family self-support and reduce the need for institutional treatment of needy, disabled and handicapped people by providing adequate facilities and services in the community and (2) improve the quality and accessibility of critical urban services including crime control, health, recreational and educational services.
2. To improve services at the HDHS MACC by eliminating existing structural and operational deficiencies and inefficiencies.
3. To provide a more centrally located facility to better serve the HDHS MACC's service population, with convenient access to public transportation.

4. To provide an HDHS MACC of large enough size to efficiently accommodate the existing and reasonably foreseeable future visitation of between 134,605 and 138,350 clinic patients.
5. To promote public safety and improve security within the HDHS MACC.
6. To promote energy efficiency, support the Countywide Energy and Environmental Policy objectives, and reduce operational costs through sustainable design and construction.
7. To maximize site utilization through the provision of on-site complementary public services and commercial uses for the HDHS MACC patients and visitors.
8. To assist in the revitalization of the Piute neighborhood.

The Final EIR evaluated proposed development on Parcels A and B. Parcel A included specific plans for the HDHS MACC; Parcel B uses were not specifically identified but were anticipated to total 67,250 square feet.

### **Parcel A – HDHS MACC**

Three components were proposed to comprise the HDHS MACC facility on the 15-acre Parcel A; building areas are shown in **Table 2**.

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**Table 2**  
**Summary of 2011 HDHS MACC Floor Area – Parcel A**

<b>Building</b>	<b>Floor Area (square feet)</b>
Main Ambulatory Care Building	121,000
Materials Management Central Plant	15,500
Building Crafts	5,500
<b>Total</b>	<b>142,000</b>

*Source: Final EIR*

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The completed project reflects the plan analyzed in the Final EIR.

The main Multi-Service Ambulatory Care building is a two-story structure with raised central atrium extending to a height of about 43 feet. Uses in the MACC include an ambulatory surgery center; a variety of clinics; ancillary services comprised of radiology, laboratory, respiratory therapy, pharmacy, electrodiagnostic testing, and therapy services (physical therapy, occupational therapy, and speech therapy); and administrative offices. There's also a gift shop and a small café with outdoor dining.



SOURCE: Final EIR

FIGURE 1

Project Location

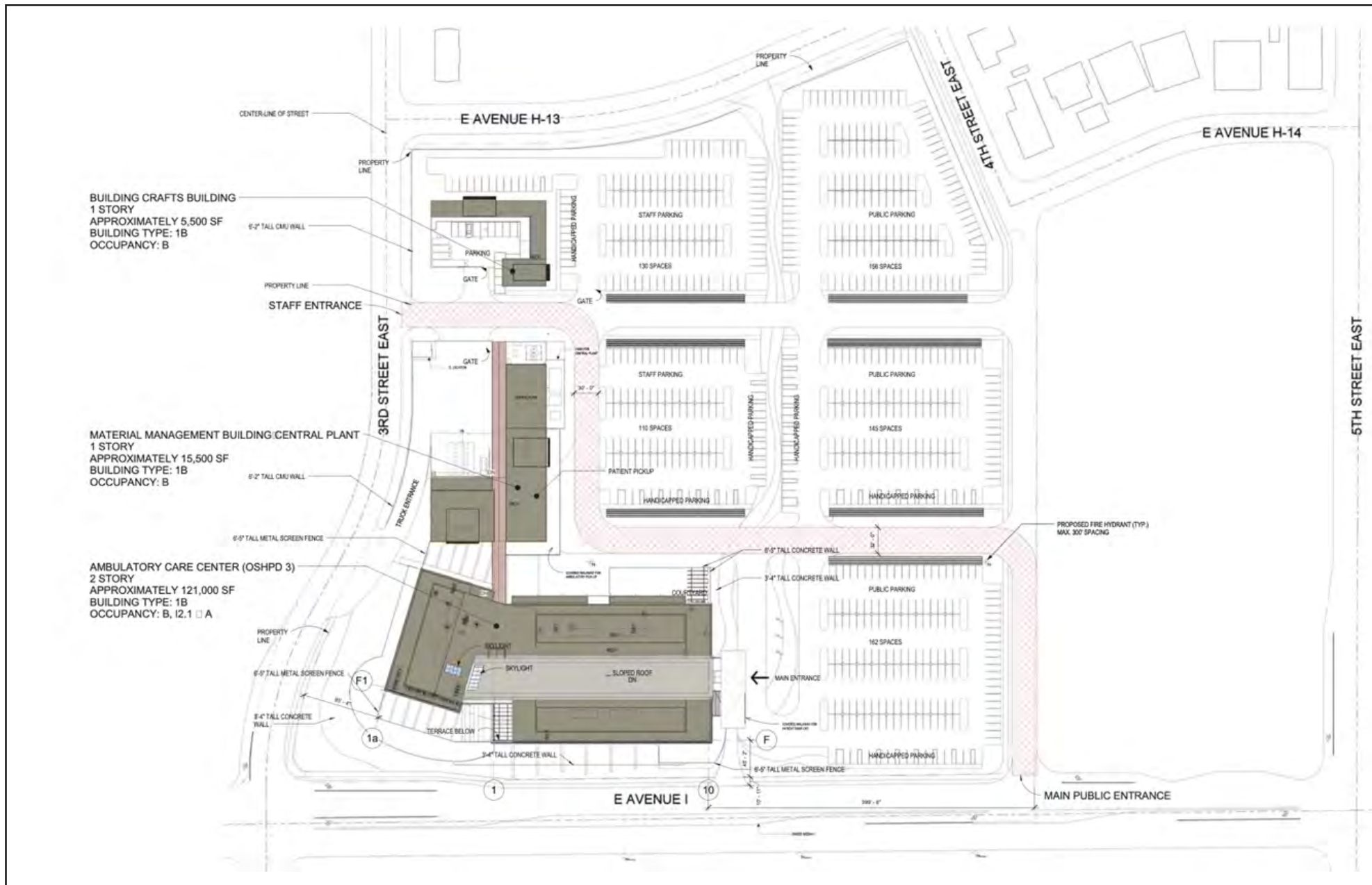




SOURCE: Final EIR

FIGURE 2





SOURCE: Final EIR

FIGURE 3



The main building on Parcel A was planned to accommodate a future maximum service population of between 124,650 and 138,350 patients in the clinics. Approximately 450 to 530 employees (including both County and non-County contract employees) were anticipated to be employed at the HDHS MACC.

The Central Plant building includes the main electrical room, cooling towers, chillers, boiler room, an electric transformer, switch pad, standby emergency diesel engine generator, and a 10,000-gallon underground storage tank (UST) to store diesel fuel to power a back-up generator to ensure continuous power in the event of an emergency or power outage. This building is fully secured with locks and gates for protection with no need for public access. Medical, surgical, and general supplies can be stored in the Materials Management Building that would be attached to the Central Plant. Medical gas cylinders, flammable products, hazardous materials, clean linen, medical and surgical equipment, and other incoming and outgoing products (including mail) are received, stored, and sorted at this location. In addition, general wastes, medical wastes, recycled wastes, soiled linen, and cardboard wastes are shipped out from this building. Deliveries and pick-ups are made at five loading docks, which are equipped with a hydraulic dock lift and that has direct access through a dedicated truck entrance driveway northbound off 3rd Street East. Trucks from this building exit through the secondary driveway off 3rd Street East to the north. The storage area for medical gas tanks (tank farm) is separated from the Materials Management Building/Central Plant building and located at the southeastern corner of 3rd Street East and the secondary driveway off 3rd Street East in accordance with applicable regulations.

North of the Materials Management Building/Central Plant and across the 3rd Street East access driveway, the Building Crafts Building houses a carpentry shop, a paint shop, an equipment maintenance area, a craft storage area, a plumbing/steam shop, a refrigeration shop, an electrical shop, a medical electronics area, offices, and support areas. This U-shaped building has a gated entrance on the southern side, with an outdoor storage area for metal containers and internal parking for ten vehicles.

## **Parcel B – Supporting Uses**

The 6-acre Parcel B comprises the eastern third of the site and was anticipated to be developed with approximately 67,250 sf of supporting County public services and commercial uses. The specific facility uses were undefined at the time of the Final EIR but were anticipated to be complementary to the out-patient services provided at the proposed 2011 HDHS MACC. Potential uses were identified as including doctor's offices, senior care services, mental health services, and a café. In accordance with County Code Section 22.52.1000 that requires 1 parking space for every 250 sf of medical office building, Parcel B was anticipated to provide a minimum of 269 parking stalls. Access to Parcel B was anticipated to be on East Avenue I with internal connection to Parcel A. Orientation of building(s) on Parcel B were unknown but anticipated to be in the southern and eastern portions of the site.

## **C. 2019 HIGH DESERT MENTAL HEALTH URGENT CARE CENTER (PARCEL B)**

**Figure 4** shows the existing High Desert Mental Health Urgent Care Center (HDMHUCC) that was approved in 2019 and opened in 2021. Construction duration was approximately 9 months. Also shown on **Figure 4** is the completed MACC on Parcel A to the west of Parcel B.

The HDMHUCC is located on the southern one-third of Parcel B. The HDMHUCC provides much needed 24/7 urgent mental health and crisis stabilization services to severely and persistently mentally ill adults and seriously emotionally disturbed children, adolescents, and their families in the Lancaster area. These mental health services include, but are not limited to, diagnosis, evaluation, treatment, referrals, consultation, community services, crisis intervention/ stabilization, medication support, and case management.

The HDMHUCC includes approximately 9,900 square-feet of building area, a surface parking lot, an ambulance drive, and landscaping improvements. The building provides nurse stations, therapy rooms, seclusion rooms, and offices for the health providers. The maximum allowed time for patients in the HDMHUCC is 23 hours and 59 minutes.

## **D. PROPOSED 2023 PARCEL B REVISIONS**

The proposed 2023 Parcel B Revisions only affect 4 acres of the 6-acre Parcel B. The proposed uses would continue to address Objectives 7 and 8 identified above. The Parcel B Revisions would provide public mental health services that would complement the existing medical center and would continue the revitalization of the Piute neighborhood. The 2023 Parcel B Revisions would include the following:

1. 9,900 square foot, one story, adult (18 and older) Crisis Residential Treatment Program (CRTP) building. The CRTP will add 16 beds and is designed to provide short-term, intensive, and supportive services in a home-like environment through an active social rehabilitation program. With the addition of this program, 275 to 400 clients will be receiving needed CRTP services annually. Individuals who are not able to return to home or the community after reaching the maximum allowable time of 23 hours and 59 minutes at the HDMHUCC, will have the benefit of being transferred across the driveway rather than a location 50 miles away or to a local hospital.
2. 9,900 square foot, one or two-story, divided equally in building area between a Children's Mental Health (MH) Hub and Children's Crisis Stabilization Unit (CSU). The MH Hub will provide mental health services and assessments for children and youth in or at-risk of entering the foster care system. Those who are in need of crisis stabilization will be able to be seen at the CSU, which will be co-located

in the same building. The MH Hub will be an expansion of a program currently housed at the High Desert Regional Health Center located on the same campus at the High Desert Regional Health Center. At the current location, 850 individuals (outpatients) are seen per year. With the proposed facility, an additional 2,650 individuals (also all outpatients) can be seen. The CSU will add 16 CSU chairs (recliners are provided for clients/patients rather than beds) and provide 24/7/365 comprehensive and coordinated delivery of crisis mental health services to children and youth ages 3 to 12 including those who are in or at-risk of entering the foster care and/or juvenile justice system. The services that will be provided at the CSU will serve as alternatives to emergency room visits and hospitalization. A minimum of 2,920 individuals will be seen annually at the proposed CSU. Patients/clients at the CSU can stay for a maximum of 23 hours and 59 minutes before they are discharged to home, community or a higher level of care depending on how well they responded to treatment.

Building the adult CRTP, the children and youth CSU and expanding the MH Hub will ensure that individuals are seen at the appropriate level of care in the most appropriate setting. These programs will allow for choices other than emergency room visits and hospitalization likely reducing visits to local emergency rooms and hospitals as well as other mental health facilities further afield.

With these new buildings Parcel B would become a Restorative Care Village (RCV) serving the Antelope Valley area. The Parcel B Revisions together with the MHUCC would result in a total of 29,700 square feet of space on Parcel B as compared to the 67,250 square feet of total building area identified in the Final EIR. Uses within the Parcel B Revisions (mental health facilities) would be consistent with the uses anticipated in the Final EIR with one of the potential uses specifically identified as mental health facilities. The Parcel B Revisions would occupy the remaining four acres of Parcel B; no additional uses are currently proposed.

Construction of the two buildings is anticipated to require approximately 12 months. A potential site plan is shown in **Figure 5**.

## **E. IMPLEMENTATION OF MASTER PLAN TO DATE**

Construction of the HDHS MACC (on Parcel A) was completed in 2015 with occupancy in early 2016 and the HDMHUCC (on Parcel B) was completed and occupied in 2021. The Final EIR contemplated a total of 67,250 square feet of support services on Parcel B (with a variety of uses considered possible including mental health facilities and commercial use); as noted above, to date only 9,900 square feet of mental health facilities has been completed on Parcel B.

## **F. CONSTRUCTION ASSUMPTIONS**

The Final EIR anticipated that construction activities would occur in two overlapping phases (20 months for Parcel A and 16 months for Parcel B) between 2012 and 2014. The duration of construction activities remains approximately the same, but a portion is now proposed at a later date in time.

Construction of the proposed new facilities are anticipated to begin in August 2024 and take 12 months to complete, with occupancy in August 2025. No other construction is anticipated to overlap with these construction activities.

Staging areas for construction would be located generally on the construction site.

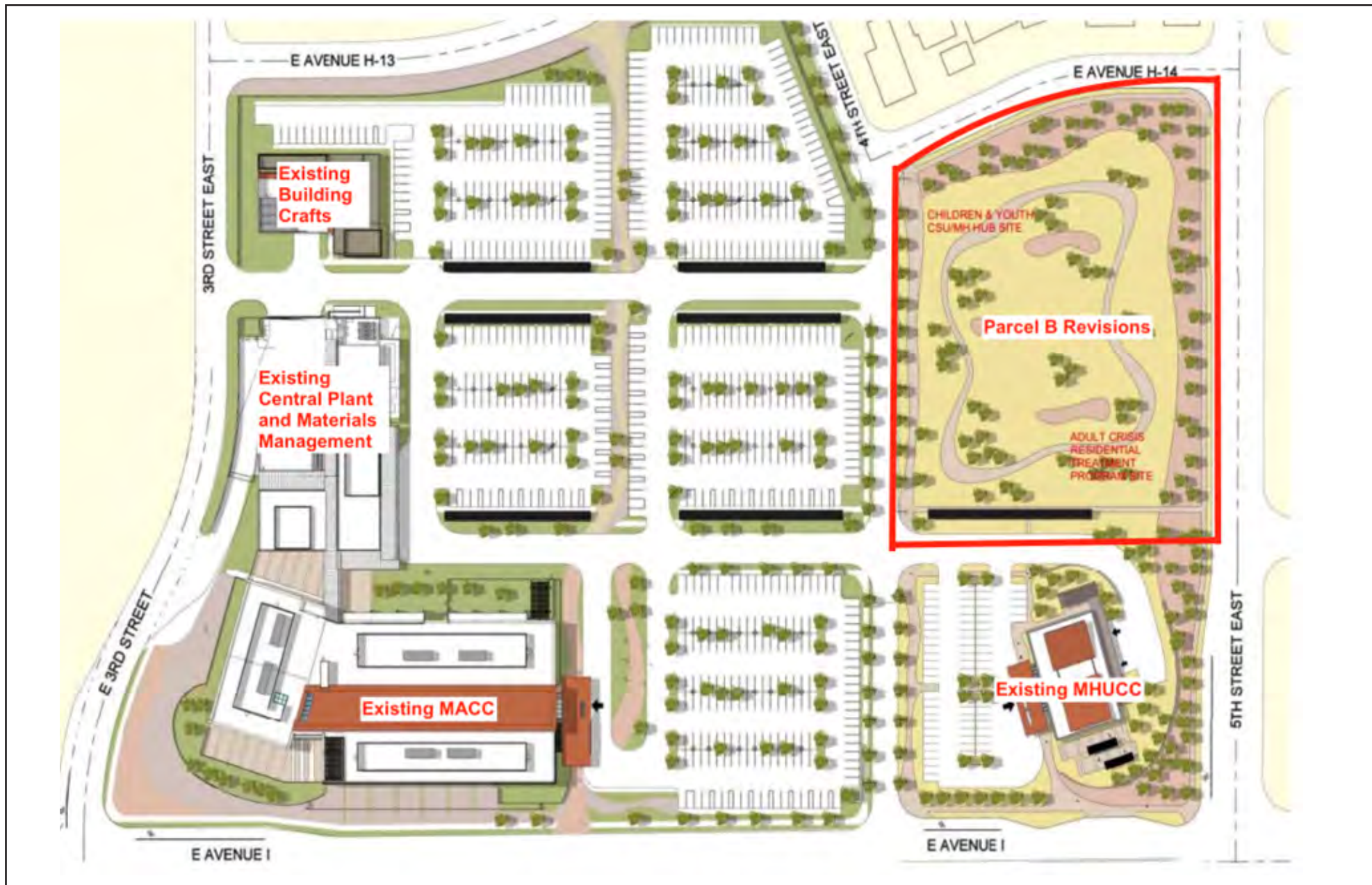
For the purposes of the Final EIR analysis, a conservative, worst-case scenario was assumed that envisioned construction on Parcel A beginning in 2012 and lasting 20 months and construction on Parcel B starting in 2013 and lasting 16 months. Some overlapping construction activities in 2013/2014 were anticipated. Construction of the HDHS MACC did not overlap with construction of the HDMHUCC. Construction assumptions in the Final EIR continue to capture the maximum day activities that would occur under the 2023 Parcel B Revisions.



SOURCE: Final EIR.

FIGURE 4





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

FIGURE 5

### 3. ENVIRONMENTAL SETTING & IMPACT ANALYSIS

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The Final EIR and the associated Findings of Fact and Statement of Overriding Considerations determined that the 2011 HDHS MACC would result in significant and unavoidable impacts in the issue areas identified below. **Table 3** compares impacts of the currently proposed 2023 Parcel B Revisions to the conclusions of the Final EIR.

1. **Air Quality** (Section 4.2 of the Final EIR). The estimated daily maximum and annual operational emissions of large particulate matter (PM10) and carbon monoxide (CO) for the HDHS MACC, primarily from vehicular emissions, were identified as exceeding the Antelope Valley Air Quality Management District (AVAQMD) standards, resulting in a significant direct impact. PM10 is a nonattainment pollutant in the AVAQMD. Long-term PM10 and CO emissions were also considered cumulatively considerable resulting in a significant cumulative impact.
2. **Greenhouse Gas Emissions** (Section 4.6 of the Final EIR). The estimated annual GHG emissions were calculated to be 8,957 MTCO2e/year, including amortized construction emissions. The projected total emissions substantially exceeded the selected significance standard of 900 metric tons of carbon dioxide equivalent per year (MTCO2e/yr), resulting in a cumulatively considerable contribution to the global GHG inventory.
3. **Utilities – Water Supply** (Section 4.13 of the Final EIR). The Final EIR indicated there to be uncertainty with respect to how much groundwater would be made available to all entities that currently pump groundwater from the Antelope Valley Basin, resulting in uncertainty with respect to water supplies. As such, water demand from the HDHS MACC was identified as having a cumulative impact on the water supplies of the Antelope Valley.

The Statement of Overriding considerations indicates that the County Board of Supervisors determined that economic, legal, social, technological, and other considerations for the 2011 HDHS MACC outweighed the significant and unavoidable impacts. The Statement of Overriding Considerations identified specific benefits the Board considered in its decision to approve the project (see Section 1 Introduction for more details).

Impacts identified in the Final EIR and Findings of Fact conservatively would continue to occur (although reduced due to reductions in size of buildings on Parcel B), overriding considerations would also continue to be applicable to the currently proposed 2023 Parcel B Revisions as the facilities would continue to provide all the benefits identified in the Statement of Overriding Considerations including meeting the County's anticipated needs, supporting a culture of health and wellness and providing jobs.

All remaining impacts were determined to be no impact, less than significant or less than significant with mitigation incorporated as summarized in **Table 3** below. With the 2023 Parcel B Revisions, and the mitigation measures previously included in the Final EIR, impacts previously identified as significant would not be worsened, and no new significant or potentially significant impacts to the physical environment would occur. Accordingly, the analyses included herein support the County’s conclusion, pursuant to *State CEQA Guidelines* Section 15164, that an Addendum is appropriate, and supports a determination by the County that no subsequent EIR is required.

**Table 3**  
**Summary of Impacts – Final EIR Compared to Impacts of the 2023 Parcel B Revisions**

<b>Impact</b>	<b>Level of Significance Final EIR</b>	<b>Level of Significance 2023 Parcel B Revisions</b>
<b>Aesthetics</b>		
Adverse effect on scenic vistas.	<i>No impact.</i> There are no scenic vistas in the vicinity of the site. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> There continue to be no scenic vistas in the vicinity of the site.
Damage to scenic resources.	<i>No impact.</i> There are no local or State scenic highways within the project area. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> No scenic vistas or scenic highways in the project area.
Degrade visual quality.	<i>Less than significant impact with mitigation.</i> Temporary changes during construction, project elements appropriate to setting and scale; Parcel B design required to complement parcel A.	<i>Less than significant impact with mitigation.</i> Project buildings would continue to be appropriate to the setting and scale; design would be complementary to and coordinated with Parcel A.
New source of substantial light and glare.	<i>Less than significant impact with mitigation.</i> Net contribution from the master Plan would be negligible.	<i>Less than significant impact with mitigation.</i> Project buildings would have negligible impact.
<b>Agricultural and Forestry Resources</b>		
Impacts to agricultural or forest resources on-site.	<i>No impact.</i> There are no agricultural or forest land resources on the site. These issues were dismissed in the Final EIR Initial Study.	<i>No Impact.</i> There are no agricultural or forest resources in the project vicinity.
<b>Air Quality</b>		
Obstruct implementation of Air Quality Plan.	<i>Less than significant impact.</i> The project would be consistent with the land use designations for the site and therefore would not obstruct the air quality plan.	<i>Less than significant impact.</i> The project would continue to be consistent with applicable plans.
Air emissions during construction and operation – cumulative emissions and sensitive receptors.	<i>Significant unavoidable project and cumulative impact – operation; less than significant impact construction.</i> Long-term operation of the project would result in estimated maximum daily and annual operational emissions, primarily from project-related traffic, that would exceed the AVAQM CEQA significance standards for CO and PM10.	<i>Potentially significant and unavoidable project and cumulative impact – operation; less than significant impact operation.</i> The 2023 Parcel B Revisions could result in similar construction and therefore would result similar emissions as compared to the 2011 HDHS MACC. Vehicle emission controls have reduced emissions; with less development on Parcel B as compared to what was evaluated in the Final EIR emission would be less.



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<b>Impact</b>	<b>Level of Significance Final EIR</b>	<b>Level of Significance 2023 Parcel B Revisions</b>
<b>Biological Resources</b>		
Impact on habitat of protected species, migratory species, wildlife corridors.	<i>Less than significant impact with mitigation.</i> The project. The site is disturbed but provides opportunities for birds to nest as well as limited amount of habitat for burrowing owl that could be disturbed by construction; identified mitigation would reduce impacts to a less than significant level.	<i>Less than significant impact with mitigation.</i> The same mitigation measures would be required and would reduce impacts in the same manner as discussed in the Final EIR.
Impacts to riparian habitat and wetlands.	<i>No impact.</i> There is no riparian habitat or wetlands on the site. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> There is no riparian habitat or wetlands on the site.
Conflict with local policies protection biological resources.	<i>No impact.</i> There are no oak trees on the site and the site is not located near a sensitive ecological area (SEA). The project would not conflict with local policies. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> There are no oak trees on the site and the site is not located near an SEA.
<b>Cultural Resources</b>		
Impacts to historical resources (built environment).	<i>No impact.</i> There were no structures on the site prior to implementation of the project. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> There are no structures on the portion of the site affected by the parcel B revisions. The remainder of the site has been developed consistent with the Final EIR.
Archaeological and Resources and human remains impacts.	<i>Less than significant impact with mitigation.</i> Ground disturbing activities have the potential to impact buried resources and remains. Mitigation would address.	<i>Less than significant impact with mitigation.</i> Grading of the site has occurred. Some additional grading would be needed mitigation would continue to be required as needed.
<b>Energy</b>		
Wasteful, inefficient or unnecessary energy consumption.	<i>Less than significant impact.</i> The Final EIR addressed energy in the analysis of Greenhouse Gas Emissions and Utilities. As an essential use, medical facilities would not be wasteful or inefficient. The 2011 HDHS MACC included energy-efficient project design features and plans for solar and wind. These efforts, combined with compliance with Title 24's energy conservation standards for new construction would help to offset increases.	<i>Less than significant impact.</i> The 2023 Parcel B Revisions continue to include green building measures that would ensure efficient energy use.
<b>Geology and Soils</b>		
Expose people or structures to risks as a result of seismic hazards; unstable or expansive soils	<i>Less than significant with mitigation.</i> The site is located in the vicinity of faults and contains soils that could constrain development. Mitigation measures would address site conditions.	<i>Less than significant impact with mitigation.</i> Similar impacts due to the same site conditions and compliance with existing regulations and required mitigation measures. (CEQA has been clarified to indicate that impacts of the environment on the project are not considered impacts under CEQA as long as the project does not exacerbate the condition.)
Soil erosion, loss of top soil.	<i>Less than significant impact.</i> Compliance with regulations would ensure less than significant impacts.	<i>Less than significant impact with mitigation.</i> The same regulations would address impacts.

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<b>Impact</b>	<b>Level of Significance Final EIR</b>	<b>Level of Significance 2023 Parcel B Revisions</b>
Landslides and soils incapable of supporting septic system.	<i>No impact.</i> The site is relatively flat and not subject to landslides; the project would connect to the local sewer system. This issue was dismissed in the Final EIR Initial Study. Paleontological resources are addressed under Cultural Resources see above.	<i>No impact.</i> The site is flat and the project would continue to connect to the local sewer system including buildings on Parcel B. Paleontological resources are addressed under Cultural Resources above.
Paleontological Resources	<i>Less than significant impact with mitigation.</i> Ground disturbing activities have the potential to impact buried resources and remains. Mitigation would address.	<i>Less than significant impact with mitigation.</i> Grading of the site has occurred. Some additional grading would be needed mitigation would continue to be required as needed.
<b>Greenhouse Gas Emissions</b>		
Generate GHG emissions that would exceed the selected threshold.	<i>Significant and unavoidable cumulative impact.</i> Estimated emissions of 13,383 MTCO <sub>2</sub> e/yr which exceeds the threshold of 900 MTCO <sub>2</sub> e/yr. Mitigation measure would reduce emissions but not below a level of significance.	<i>Significant and unavoidable cumulative impact.</i> Emissions from 2023 Parcel B Revisions would continue to contribute to total emissions that would exceed the identified threshold.
Consistency with applicable plans related to GHG emissions.	<i>Less than significant impact.</i> The project would be consistent with relevant polices and plans.	<i>Less than significant impact.</i> The project would continue to be consistent with relevant polices and plans.
<b>Hazards and Hazardous Materials</b>		
Routine transport, use or disposal.	<i>Less than significant impact with mitigation.</i> Construction activities associated with the HDHS MACC would have the potential to encounter polychlorinated biphenyls that may be contained within the existing pole-mounted transformers located on the project site.	<i>Less than significant impact with mitigation.</i> The same impact as identified in the Final EIR could occur, and the impact would similarly be reduced to a less than significant level with mitigation.
Hazardous materials within ¼ mile of a school.	<i>Less than significant.</i> Five schools were identified within ¼ mile of the site. Compliance with regulations would ensure this impact to be less than significant.	<i>Less than significant impact.</i> Compliance with regulations would continue to ensure this impact to be less than significant.
Upset and accident conditions, government databases, proximity to airports/airstrips, interfere with emergency response, wildland fires.	<i>No impact/less than significant impact.</i> Compliance with the federal, State, and local requirements was found to reduce the risk of damage or injury from the risk of accidental release of hazardous materials. There are no recognized environmental conditions on the site. The site is not located in proximity to an airport or airstrip. Compliance with City requirements would reduce temporary traffic impacts on emergency response. The site is not located near wildlands. These issues were dismissed in the Final EIR Initial Study.	<i>No impact/less than significant impact.</i> Compliance with existing regulations would result in similar impacts to those identified in the Final EIR.
<b>Hydrology and Water Quality</b>		
Violate water quality standards, impact groundwater, alter drainage patterns, create runoff that exceeds capacity of stormwater drainage, substantially degrade groundwater.	<i>Less than significant impact.</i> Stormwater runoff could impact water quality, regulations would ensure adequate drainage and BMPs to address water quality.	<i>Less than significant impact.</i> The 2023 Parcel B Revisions would not result in substantial changes with respect to hydrology as compared to what was analyzed in the Final EIR.

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<b>Impact</b>	<b>Level of Significance Final EIR</b>	<b>Level of Significance 2023 Parcel B Revisions</b>
Impacted by flooding, seiche, tsunami; risk of release of pollutants.	<i>No impact.</i> The site is not located within a 100-year floodplain, nor is it subject to flood hazards. There are no dams or water bodies located in the vicinity of the site that would subject the site to hazards associated with inundation, seiche, or tsunami. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> The site is not within a flood zone and there are no bodies of water nearby that could impact the site.
<b>Land Use and Planning</b>		
Potential to divide a community and consistency with applicable plans.	<i>No impact or less than significant impact.</i> The site was vacant prior to initiating the project; the HDHS MACC would not introduce a land use that could divide the established neighborhoods to the north and east. The project is consistent with the City's Office Professional (O-P) designation and zoning and would not require a General Plan amendment or zone change. The project would not conflict with any applicable plans, policies, or regulations related to land use. These issues were dismissed in the Initial Study.	<i>No impact or less than significant impact.</i> The proposed 2023 Parcel B Revisions would represent a continuation of the now existing use and would be substantially consistent with applicable plans and policies.
<b>Mineral Resources</b>		
Loss of mineral resources.	<i>No impact or less than significant impact.</i> The project would negligibly increase demand for mineral resources. The project area does not contain mineral resources. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> No mineral resources are known to exist in the vicinity of the site.
<b>Noise</b>		
Construction noise impacts to adjacent uses. Operational noise from traffic and wind turbines.	<i>Less than significant impact with mitigation.</i> Based on the proximity to noise-sensitive receptors in the site vicinity (residences), construction of the project would result in short-term noise related to the use of heavy mobile equipment that could exceed the County standard; mitigation would reduce the impact to less than significance.  As a result of increased vehicle trips operational noise would increase but by a less than significant amount for off-site receptors. Wind turbines have the potential to impact ambient noise. Mitigation measures would reduce operational noise.	<i>Less than significant impact with mitigation.</i> Grading and construction activities would occur in a similar manner as described in the Final EIR. The Final EIR evaluated construction noise impacts at similar distances to sensitive receptors as would be impacted with the proposed 2023 Parcel B Revisions and therefore impacts would be similar. Operational impacts would also continue to be similar to those evaluated in the Final EIR.
Vibration impacts.	<i>Less than significant impact.</i> Vibration impacts from construction and operation would be less than significant.	<i>Less than significant impact.</i> Vibration impacts would be similar to those identified in the Final EIR.
Located near an airport or airstrip.	<i>No impact.</i> The site is not located near an airport or airstrip. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> The site is not near an airport or airstrip.
<b>Population and Housing</b>		
Induce substantial population growth.	<i>Less than significant impact.</i> Construction jobs are anticipated to draw from the local labor pool and not have a notable impact on housing demand. Some operational employment was	<i>Less than significant impact.</i> The proposed 2023 Parcel B Revisions would create construction jobs. Impacts would continue

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<b>Impact</b>	<b>Level of Significance Final EIR</b>	<b>Level of Significance 2023 Parcel B Revisions</b>
	relocated from another facility, other employment would generally be expected to draw from the local workforce be consistent with local and regional forecasts.	to be similar to those described in the Final EIR.
Displace housing or people.	<i>No impact.</i> The site was vacant prior to initiating the project. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> There are no housing units on site.
<b>Public Services</b>		
Impact to emergency access, police services, such that new facilities need be constructed.	<i>Less than significant impact.</i> Compliance with existing regulations was anticipated to result in less than significant impacts.	<i>Less than significant impact.</i> The 2023 Parcel B Revisions could include similar construction activity and result in less total development. Impacts would be similar or less than those analyzed in the 2011 Final FEIR.
Impacts to schools, parks and other public facilities such that new facilities would need to be constructed.	<i>No impact.</i> No residential uses proposed that could result in a demand for schools, libraries, parks, or other public facilities. These issues were dismissed in the Final EIR Initial Study.	<i>No impact.</i> No residential uses proposed that could increase demand for these public services.
<b>Recreation</b>		
Impact to existing recreational facilities, require construction of new facilities.	<i>No impact.</i> No residential use proposed that would increase demand for parks and recreational facilities. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> The 2023 Parcel B Revisions would include the same uses as anticipated in the Final EIR.
<b>Tribal Cultural Resources</b>		
Result in a substantial adverse impact to a tribal cultural resource	<i>Less than significant impact with mitigation.</i> The Final EIR addressed impacts to Tribal Cultural Resources with archaeological resources under Cultural Resources above.	<i>Less than significant impact with mitigation.</i> See archaeological resource discussion above.
<b>Transportation and Traffic</b>		
Conflict with plan addressing circulation, including transit, bicycle and pedestrian facilities.	<i>Less than significant with mitigation.</i> Construction on Parcel A required temporary relocation of a bus stop; mitigation reduced this impact to a less than significant level.	<i>Less than significant impact.</i> The 2023 Parcel B Revisions would not substantially impact circulation.
Traffic impacts during construction and operation.	<i>Less than significant impact.</i> Project operation would increase trips on local roadways (8,488 daily trips). Less than significant impacts were identified.	<i>Less than significant impact.</i> Since the total building area could be less under the proposed 2023 Parcel B Revisions, vehicle trips and associated miles travelled could also be less; therefore, VMT impacts would be less or similar. The site is in close proximity to transit and therefore would have fewer VMT impacts than projects located further from transit. CEQA has removed delay and levels of service as impacts under CEQA. Traffic impacts of the 2023 Parcel B Revisions would continue to be less than significant.
Increase hazards due to geometric design.	<i>No impact.</i> The project would not include uses or design features that could create traffic hazards. This issue was dismissed in the Final EIR.	<i>No impact.</i> No changes in use or potential traffic hazards would occur.

<b>Impact</b>	<b>Level of Significance Final EIR</b>	<b>Level of Significance 2023 Parcel B Revisions</b>
Result in inadequate emergency access.	<i>Less than significant impact.</i> Compliance with regulatory requirements would ensure a less than significant impact.	<i>Less than significant impact.</i> Compliance with regulatory requirements would continue to ensure a less than significant impact.
<b>Utilities and Service Systems</b>		
Impacts to water facilities, wastewater treatment, storm water, solid waste, electric and natural gas.	<i>Less than significant impact (wastewater treatment, stormwater, solid waste, electricity and natural gas).</i> Based on developed area and compliance with existing regulations, the Final EIR concludes less than significant impacts to wastewater treatment, storm water, and solid waste.	<i>Less than significant impact.</i> The proposed 2023 Parcel B Revisions would result in similar construction and less developed area as compared to the 2011 HDHS MACC. Impacts would be similar to those identified in the 2014 FEIR.
Have sufficient water supplies available.	<i>Significant and unavoidable cumulative impact.</i> The Los Angeles County Water Works District 40 is the water supplier for the project area; water comes from two sources – groundwater in the Antelope Valley Basin and the State Aqueduct when available. Future availability of groundwater is uncertain. There is the potential that the proposed project’s demand for water supply will have a cumulative impact on the water supplies of the Antelope Valley.	<i>Significant and unavoidable cumulative impact.</i> The 2023 Parcel B Revisions would be within the assumptions of the Final EIR. Future availability of groundwater continues to be uncertain and therefore is still considered cumulatively significant.
<b>Wildfire</b>		
Impair emergency response, exacerbate risks, require installation of infrastructure, expose people or structures to risks including downslope flooding or landslides as a result of post-wildfire conditions	<i>No impact.</i> The project site is located in a developed area of the City of Lancaster and is not adjacent to wildlands, nor is it in or near areas designated as a Very High Fire Hazard Severity Zone. Therefore, no impacts would occur. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> The project site is not located near wildland areas or a Very High Fire Severity zone.

## **A. AESTHETICS**

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

<b>(a) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantial adverse effects on a scenic vista?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

There are no designated scenic vistas in the project area; therefore the 2011 HDHS MACC resulted in no impact with respect to scenic vistas.

## **2023 Parcel B Revisions**

### ***Construction, Operation and Conclusion***

Since there continue to be no designated scenic vistas in the project area, the 2023 Parcel B Revisions would continue to have no impact. There would be no new or substantially greater impacts than those identified in the Final EIR and no changes to or additional mitigation is required.

<b>(b) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantially damaging scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

The Final EIR indicates that the project site is not located within the vicinity of a designated local or State Scenic Highway (California Scenic Highways Mapping System), and therefore the Final EIR indicated no impacts with respect to substantially damaging scenic resources within a state scenic highway.

## **2023 Parcel B Revisions**

### ***Construction, Operation and Conclusion***

Conditions have not changed with respect to state-designated scenic highways. There would be no new or greater impacts than those identified in the Final EIR and no changes to or additional mitigation is required.

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

## **Final EIR**

### ***Construction***

The Final EIR indicates that during construction of the HDHS MACC, there would be views of construction activities throughout the various stages of project implementation. Views of on-site construction would include activities and materials such as grading and associated heavy equipment (e.g., graders, bulldozers, dump trucks), building construction activities and equipment, and stockpiles of building materials and vehicle staging areas. In general, views of construction activities may be considered unappealing by some; however, construction and other forms of development are common in urban areas and interruptions to the visual character of the site are largely accepted as a temporary inconvenience and therefore the Final EIR identified the impact as less than significant.

## ***Operation***

The Final EIR indicated that impacts on visual quality are generally subjective due to personal preference, and that since the site was planned for urban land uses in the *Lancaster General Plan*, it was assumed that development of the site is not considered a degradation of the visual quality. The Final EIR indicates that development of the site is intended to improve the aesthetics of the area, in part by developing new structures and site improvements, including landscaping. Also, design and construction of the site in accordance with the County's Green Building Program and to meet LEED Silver certification would create a sustainable project and landscaping/construction materials would be consistent with the requirements set forth therein. The Final EIR indicated that while development on Parcel B would permanently change views of the site from nearby land uses, with implementation of MM 4.1-1, there would be less than significant impacts to visual quality from construction on Parcel B. Therefore, the Final EIR found that while the project would change the existing visual character of the site, this change would not be considered a substantial degradation, and could be interpreted to be beneficial, and therefore impacts were found to be less than significant with mitigation.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

The 2023 Parcel B Revisions are on a portion of Parcel B; the remainder of the project has been developed consistent with the Final EIR. Construction activities would be similar to those evaluated in the Final EIR and would similarly have less-than-significant impacts with respect to visual character and quality of public views. The 2023 Parcel B Revisions would create a more aesthetic public environment than under existing conditions. It would introduce similar elements that would enhance the public interface along adjacent streets. The 2023 Parcel B Revisions would not substantially degrade the visual character or quality of the site or its surroundings because of height, bulk, pattern, scale, character, and other features; impacts would continue to be less than significant. Mitigation measure MM-4.1-1 would continue to be required to further reduce impacts.

## ***Conclusion***

The 2023 Parcel B Revisions would not substantially change the aesthetic character of the site as compared to what was evaluated in the Final EIR. Impacts with respect to visual character and quality would be less than significant and similar to those of the 2011 HDHS MACC and no changes to or additional mitigation is required.



<b>(d) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction***

The Final EIR indicates that construction activities would be temporary (approximately 20 months for Parcel A and 16 months for Parcel B) and are not expected during the nighttime hours, in compliance with the City's Municipal Code, and lighting during the construction phase would be limited to security lighting of the construction site. Nighttime security lighting of the construction site would be of a similar level to exterior lighting for surrounding residential and commercial land uses and would therefore not be a source of substantial light and glare. Therefore, this impact would be less than significant.

### ***Operation***

The Final EIR indicates that the HDHS MACC would have lighted signs, parking lot light poles, walkway and landscape lighting, entry lights, and security lights, as well as interior lights that would be visible through glass windows and curtain walls. The Final EIR indicates that exterior and interior lights at the HDHS MACC would introduce new light and glare sources that would increase nighttime lighting levels at the vacant site, and that exterior security lighting, sign lighting, and parking lot lighting would be visible to residential uses to the north and east of the site. Since the HDHS MACC Main Ambulatory Care Building is located over 500 feet from the nearest residences in the southwestern corner of the site, interior lighting and exterior security lights were not expected to have an adverse effect on nearby residences. Also, lighted signs were proposed to be backlit using light emitting diode (LED) modules that generally create less glare. Parking lot lighting at the northern edge of Parcel A were identified as being located near residences and higher than the block wall proposed along the site boundaries and therefore had the potential to increase lighting levels and adversely affect residents during the late evening and early morning hours. The Final EIR indicates that for Parcel B parking lots have the potential to allow for vehicle headlights to be directed into the single-family homes across East Avenue H-14 and 5th Street East during the late evening and early morning hours. Therefore, the Final EIR identified MM 4.1-2 to reduce potential impacts (if it is determined

that the site plan allows for headlights to shine directly into adjacent residences, a block wall, berm, dense shrubs, or other effective barrier shall be constructed along East Avenue H-14 and/or 5th Street East).

The Final EIR indicates that compliance with the County's lighting standards, which requires all exterior lighting to be indirect (such as upward or downward facing), and screened from adjacent residential land use, would avoid light spillover and prevent glare or direct illumination in adjacent residences. The Final EIR identified mitigation to prevent the creation of glare from glass and glazing materials and metals (MM 4.1-3 requires the use of non-reflective building materials to reduce glare). Acceptable materials would include, but not be limited to, low-reflectivity glass, concrete, masonry materials (e.g., brick, stone, stucco), and brushed metals. With implementation of MM 4.1-3, impacts related to glare generated were considered less than significant.

## **2023 Parcel B Revisions**

### ***Construction***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the Final EIR. The lighting needed during construction of the 2023 Parcel B Revisions would generate a similar amount of minor light spillover in the vicinity of the site as compared to the 2011 HDHS MACC. Any construction-related nighttime illumination would be used for safety and security purposes only, would be in specific locations within the site, and would not be experienced by any sensitive, off-site receptors for a long duration. Any off-site construction activities that may be necessary to address infrastructure improvements would be the same as for the 2011 HDHS MACC, would be limited, and would occur during daylight hours. Construction lighting would not adversely affect off-site sensitive receptors. Therefore, artificial light impacts associated with construction of the 2023 Parcel B Revisions would be less than significant. As with the 2011 HDHS MACC, construction activities for the 2023 Parcel B Revisions would not result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. As such, construction glare impacts would be the same, less than significant.

### ***Operation***

Similar to the 2011 HDHS MACC, the 2023 Parcel B Revisions have the potential to introduce new point source lighting, including architectural lighting, security and wayfinding lights, landscape lighting, and visible interior light emanating from the windows of the new buildings (of similar height to those evaluated in the Final EIR). Emergency service access would be interior to the site and shielded from adjacent residential neighborhoods. The same type of security lighting and landscape lighting would be used for the 2023 Parcel B Revisions as the 2011 HDHS MACC and would be similar to the existing lighting. Therefore, the 2023 Parcel B Revisions would not be expected to substantially increase ambient light or

cause light spill onto adjacent light-sensitive receptors and impacts would be less than significant with the same mitigation measures required. Similar to the 2011 HDHS MACC, the 2023 Parcel B Revisions would not generate substantial glare from reflected sunlight, and glare impacts would be less than significant, the same as the 2011 HDHS MACC.

### ***Conclusion***

Impacts of the 2023 Parcel B Revisions with respect to light and glare would be similar to those identified in the Final EIR and would be less than significant with mitigation; no changes to or additional mitigation is required.

## **B. AGRICULTURAL AND FORESTRY RESOURCES**

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

<b>Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to any of the following:</b>		
<b>(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</b>		
<b>(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</b>		
<b>(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</b>		
<b>(d) Result in the loss of forest land or conversion of forest land to non-forest use?</b>		
<b>(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

The project site does not support agricultural uses or forest land. There is no land designated as Farmland or classified as a “forest reserve” area on or near the site. The site is also not under a Williamson Act

Contract. There are no adjacent agricultural or forest uses. Therefore, the Final EIR identified no impact related to these issues.

## **2023 Parcel B Revisions**

### ***Construction, Operation and Conclusion***

The land uses on the site and surrounding area have not changed since the Final EIR. The site is not located on designated farmland or forest land. The 2023 Parcel B Revisions would not convert farmland or forest land, nor would they conflict with existing zoning for agricultural or forestry uses or a Williamson Contract. As under the Final EIR, the 2023 Parcel B Revisions would have no impacts with respect to agricultural and forest resources and no changes to or additional mitigation is required.

## **C. AIR QUALITY**

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

<b>(a) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to conflict with or the potential to obstruct implementation of the applicable air quality plan?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

The Final EIR found that proposed uses for the HDHS MACC (Parcels A and B) were consistent with the land use designation (Office Professional) in the *City of Lancaster General Plan* and the zoning (Office Professional) for the site. As such, implementation of the HDHS MACC was found to not interfere with the AVAQMD's ability to comply with State and federal air quality standards and the impact was less than significant, and no mitigation was required.

## 2023 Parcel B Revisions

### *Construction and Operation*

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the Final EIR. The Parcel B Revisions would result in less construction than anticipated in the Final EIR and therefore emissions would be less than evaluated in the Final EIR; in addition, as time has passed construction equipment has been increasingly regulated and emissions continue to be reduced. The 2023 Parcel B Revisions would continue to be consistent with the City's General Plan and the most recent (2020) RTP/SCS and thus consistent with air quality plans. The 2023 Parcel B Revisions would continue to be supportive of RTP/SCS policies related to reducing vehicle trips and locating public-serving uses near transit. The 2023 Parcel B Revisions would be consistent with the development assumptions in the Final EIR (same use as anticipated but less total development on Parcel B) and therefore consistency with air quality plans would be the same and less than significant.

### *Conclusion*

Impacts of the 2023 Parcel B Revisions related to consistency with the air quality plans would be similar to those described in the Final EIR and no changes to or additional mitigation is required.

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

The AVAQM's CEQA and Federal Conformity Guidelines were updated in 2016 and establish significance thresholds to assess the regional impact of project-related air pollutant emissions in the AVAQM. These thresholds remain similar to those included in the Final EIR with the following exceptions: the addition of GHG (CO<sub>2</sub>e) thresholds (100,000 tons per year and 548,000 pounds per day); the standard for PM<sub>2.5</sub> decreased from 15 tons per year and 82 pounds per day to 12 tons per year and 65 pounds per day. These changes in thresholds do not affect the conclusions of the Final EIR (except that GHG would be below these thresholds, see discussion below under GHG).

### ***Construction***

During construction, maximum daily project-related criteria pollutant emissions were identified as not exceeding AVAQMMD regional thresholds for any pollutant.

### ***Operation***

During operation, maximum daily project-related criteria pollutant emissions over existing conditions were calculated to exceed AVAQMMD thresholds for carbon monoxide (CO) and particulate matter of 10 microns (PM10). The Final EIR identified MM 4.2-1, ride-sharing programs for County employees, to reduce emissions but even with this measure project emissions were anticipated to exceed thresholds. Consequently, the impact of operations-related emissions from the HDHS MACC (Parcels A and B) were considered significant and unavoidable.

## **2023 Parcel B Revisions**

### ***Construction***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. The 2023 Parcel B Revisions would result in less development on Parcel B (and therefore the site as a whole). Nonetheless, maximum daily construction activity would be similar to what was analyzed in the Final EIR. Thus, similar to the analysis contained in the Final EIR, maximum daily emissions from construction of the 2023 Parcel B Revisions would not exceed the thresholds for any criteria pollutants. Additionally, because construction of the 2023 Parcel B Revisions is taking place later than anticipated and would be subject to more stringent regulatory controls, emissions are anticipated to be less than identified in the Final EIR. Therefore, the 2023 Parcel B Revisions would not result in a cumulatively considerable net increase of a criteria pollutant. Consequently, construction impacts would be less than significant, the same as identified in the Final EIR.

### ***Operation***

The 2023 Parcel B Revisions could result in less building area as compared to that analyzed in the Final EIR and therefore would result in less building energy consumption and fewer trips. In addition, energy efficiency requirements and vehicle emissions controls have become much more stringent than anticipated in the Final EIR. Therefore, emissions from operation of the 2023 Parcel B Revisions would be less than those identified in the Final EIR. The Final EIR indicated that both CO and PM10 would exceed AVAQMMD thresholds. With increasingly stringent regulations and reduced building area, it is likely that the HDHS MACC -- Parcels A and B together would not exceed AVAQMMD thresholds. However, for purposes of this

Addendum, impacts would not be greater than those evaluated in the Final EIR and impacts would remain significant and unavoidable.

### ***Conclusion***

Criteria pollutant emissions associated with the 2023 Parcel B Revisions would not be greater than those evaluated for in the Final EIR. For purposes of this Addendum construction impacts would be less than significant and operational impacts are considered to remain significant and unavoidable. No changes to or additional mitigation is required.

<b>(c) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to the potential to expose sensitive receptors to substantial pollutant concentrations?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sensitive land uses in proximity to Parcel B include residences to the north (approximately 60 feet) and to the east (approximately 80 feet). To the south of Parcel B is the Deputy Pierre W. Bain Park/Eastside Pool (approximately 400 feet). In addition, there are five schools located within approximately one-quarter mile of the project site:

- Piute Middle School (Lancaster School District), 425 East Avenue H-11, located 0.1 miles to the north;
- Antelope Valley High School/Desert Winds Continuation High School campus (Antelope Valley Union High School District), 44900 Division Street/45030 3rd Street East, located 0.15 miles to the southwest;
- Lancaster University Center (California State University, Fresno), 45356 Division Street, located 0.2 miles to the northwest;
- Linda Verde Elementary School (Lancaster School District), 44924 5th Street East, located just over 0.25 miles to the southeast; and
- Phoenix High School (Antelope Valley Union High School District), 228 East Avenue H-8, located 0.3 miles to the northwest.

## **Final EIR**

### ***Construction***

Project construction would result in the generation of diesel PM emissions from the use of off-road diesel equipment that is required for construction activities and from on-road diesel equipment used to bring materials to and from the site. For each Parcel, the period of construction activity with use of heavy diesel equipment (i.e., grading) would last less than six months. The exposure to nearby individuals was identified as less than significance thresholds and the impact was identified as less than significant.

### ***Operation***

Long-term operations would increase building square footage, which would increase the use of existing and/or introduce new permitted sources on-site and would increase traffic on local roadways. The Final EIR found that CO would not result in a CO hot spot. The Final EIR indicates that impacts related to potential project-generated exposure to toxic air contaminants (TACs) on surrounding land uses would be reduced through regulatory controls and were identified as less than significant.

## **2023 Parcel B Revisions**

### ***Construction***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site was developed consistent with the Final EIR assumptions. The construction activities for the 2023 Parcel B Revisions would be similar to or less than those evaluated in the Final EIR, and therefore would be less than significant.

### ***Operation***

The 2023 Parcel B Revisions would result in similar or less operational emissions on the site as a whole as compared to those evaluated in the Final EIR. The 2023 Parcel B Revisions would include uses consistent with those assumed in the Final EIR although total development on Parcel B would be less than half that assumed in the Final EIR. Potential long-term operational impacts associated with the release of TACs from the 2023 Parcel B Revisions uses would be similar to or less than those evaluated in the Final EIR and would be less than significant.

The traffic generated under the 2023 Parcel B Revisions would be less than identified in the Final EIR. Therefore, the 2023 Parcel B Revisions would not cause or contribute to the formation of CO hotspots, and



CO concentrations at nearby intersections would remain well below the ambient air quality standards, the same as identified in the Final EIR.

## ***Conclusion***

Emissions associated with the 2023 Parcel B Revisions would be similar to or less than those evaluated in the Final EIR and localized impacts and impacts on sensitive receptors would be less than significant during construction and operation, the same as identified in the Final EIR. No changes to or additional mitigation is required.

<b>(d) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to other emissions such as those leading to odors adversely affecting a substantial number of people?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction***

The Final EIR indicated that project construction would use equipment and activities that would generate odors, and these odors would periodically be noticeable. However, the odors would be temporary and would dissipate rapidly from the source with an increase in distance. Therefore, the impacts would be short-term, would not affect a substantial number of people, and were therefore identified as less than significant.

### ***Operation***

Land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding, none of which were proposed under the HDHS MACC. The most likely long-term potential nuisance odors were anticipated to be from cooking, landscaping maintenance, and trash receptacles. All these sources were identified as being located over 150 feet from the nearest residences, and they would be typical of such urban land uses. Due to the typical nature of the odors and the distance to the receptors, the

odors were not considered to be objectionable by a substantial number of people and the impact was identified as less than significant.

## **2023 Parcel B Revisions**

### ***Construction***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. The 2023 Parcel B Revisions would include similar construction activities as identified in the Final EIR and would not create or introduce objectionable odors affecting a substantial number of people. Therefore, impacts related to construction odors would be the same as those identified in the Final EIR and impacts would be less than significant.

### ***Operation***

The 2023 Parcel B Revisions would include generally the same operational uses as identified in the 2011 Final EIR and would not create or introduce objectionable odors affecting a substantial number of people. Therefore, impacts related to operational odors would be the same as identified in the Final EIR and would continue to be less than significant.

### ***Conclusion***

The 2023 Parcel B Revisions would have similar emissions, including odor emissions, as compared to the those evaluated in the Final EIR and impacts would continue to be less than significant. No changes to or additional mitigation is required.

## **D. BIOLOGICAL RESOURCES**

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

<p><b>Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:</b></p> <p>(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS)?</p> <p>(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p> <p>(c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p> <p>(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

#### **Sensitive and Special Status Species**

No federal or state threatened or endangered species were identified as having the potential to occur on the site (neither Parcel A nor Parcel B). Both parcels were identified as heavily disturbed providing only limited resources to support plant and wildlife species. Most special status species were not expected to occur on the site due to lack of suitable habitat. Some bird species, including the northern harrier and tri-colored blackbird, as well as some mammals, including the pallid bat and Townsend's big-eared bat, may occur occasionally only for foraging. Any impacts to these species resulting from project implementation were considered adverse but less than significant, and no mitigation was required. The Final EIR indicated that some migratory birds may use the site for foraging or nesting and identified MM 4.3-1 (site clearing before nesting season or bird survey) to reduce potential impacts to migratory birds to a less than significant level.

#### **Riparian Areas and Wetlands**

The project site does not contain riparian habitat, wetlands, or any other sensitive natural vegetation community. Therefore, no impact related to these issues would occur.

## **Wildlife Movement**

The project site is located within an area that is largely constrained by existing urban development. The Final EIR indicated that urban-tolerant wildlife species could move through the urban areas to the site; however, regional movement was not anticipated to occur because of the urban development surrounding the site. Impacts to migratory birds would be addressed by MM 4.3-1 discussed above. Therefore, the Final EIR identified impacts to wildlife movement to be less than significant, and no mitigation was required.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. No new suitable habitat for candidate, sensitive, or special-status species has been identified since the Final EIR. Parcel B was recently further disturbed during construction of the MHUCC. Therefore, impacts of the 2023 Parcel B Revisions on candidate, sensitive, or special-status species would be the same as identified in the Final EIR and impacts would continue to be less than significant, because of lack of suitable habitat. Potential impacts to migratory birds would continue to be addressed by MM 4.3-1. Therefore, impacts would continue to be less than significant with implementation of mitigation.

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

### ***Conclusion***

Impacts to biological resources would be the same for the 2023 Parcel B Revisions as evaluated in the Final EIR and would continue to be less than significant with mitigation required to address migratory birds and no changes to or additional mitigation is required.

<b>(e) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

There are no applicable City of Lancaster policies or ordinances protecting biological resources. County policies, including the Significant Ecological Area (SEA) designations and the County's Oak Tree Ordinance, are not applicable to the project site because there are no oak trees on the site and the site is not located within a designated SEA. No Habitat Conservation Plan or Natural Community Conservation Plan applies to the project site. Therefore, the Final EIR identified no impacts with respect to local policies and ordinances.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

The 2023 Parcel B Revisions are on a portion of the project site evaluated in the Final EIR; the remainder of the site has been developed as identified in the Final EIR. No major land use changes have occurred on the site or the surrounding area. No biological resources exist on the site. The landscape plan incorporated into the 2023 Parcel B Revisions would be similar to those proposed under the 2011 HDHS MACC. Therefore, like the 2011 HDHS MACC, the 2023 Parcel B Revisions would not conflict with local policies or ordinances protecting biological resources during construction or operation.

## ***Conclusion***

Impacts related to local policies or ordinances protecting biological resources would be the same for the 2023 Parcel B Revisions as evaluated for the 2011 HDHS MACC in the Final EIR.

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

## Final EIR

### *Construction and Operation*

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

### 2023 Parcel B Revisions

### *Construction, Operation and Conclusion*

No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan has been adopted covering the Campus or adjacent areas. Therefore, the 2023 Parcel B Revisions would not conflict with any such plans and no impacts would occur during construction or operation, the same as for the 2011 HDHS MACC.

Impacts related to adopted habitat plans and natural community conservation plans would be the same for the 2023 Parcel B Revisions as evaluated for the 2011 HDHS MACC in the Final EIR.

## E. CULTURAL RESOURCES

The potential for the currently proposed 2023 Parcel B Revisions to result in new or substantially more adverse significant impacts to cultural resources was evaluated in relation to the Final EIR, required mitigation measures and three questions recommended for consideration by the *State CEQA Guidelines*. The Final EIR did not separately address Tribal Cultural Resources (TCRs); any TCRs would have been identified as part of the evaluation of archeological resources discussed under Cultural Resources in the Final EIR.

<b>(a) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of a historical resource as defined in §15064.5?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

There were no structures on the site prior to implementation of the project and therefore no impacts were identified.

## **2023 Parcel B Revisions**

### ***Construction, Operation and Conclusion***

Other than the newly constructed MHUCC, there are no buildings on the Parcel B site and therefore no impacts would occur.

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

## **Final EIR**

### ***Construction and Operation***

No significant historical or archaeological resources were identified on the surface of the site. The structures that were once present on the site were removed, and a single isolate recorded there was identified as gone in the Final EIR. The Final EIR identified the possibility that subsurface remnants of the structures that once stood on the site may still be present, but that they would not be considered significant. The Final EIR indicated that no prehistoric archaeological sites had been recorded on or near the area and that was not anticipated, given the amount of disturbance due to previous development and grading, that any were present in the subsurface. However, grading and excavation activities during construction have the potential to uncover unknown archaeological resources. Excavation to a depth of 15 feet was anticipated in the Final EIR.

The potential for archaeological resources to be uncovered during construction activities was addressed by MM 4.4-1, that requires that in the event that resources are encountered during construction, construction activities be halted until a qualified Archaeologist makes a determination as to whether it is a “unique archaeological resource” or a “historical resource”. If the qualified Archaeologist determines that the find is a unique archaeological resource or a historical resource, a mitigation plan must be formulated to appropriately address the find. With implementation of MM 4.4-1, the Final EIR identified impacts to be less than significant impacts. No impacts were anticipated during operation as no further excavation was anticipated on completion of construction.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

The 2023 Parcel B Revisions would include the same type of ground-disturbing activities as identified in the Final EIR. The possible presence of unknown archaeological resources would result in the same potential for impacts to archaeological resources (including Tribal Cultural Resources) and would be subject to the same regulations and mitigation measures which would continue to reduce these impacts to a less- than-significant level.

### ***Conclusion***

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



## F. ENERGY

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

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

### Final EIR

#### *Construction and Operation*

The Final EIR addressed energy in connection with Greenhouse Gas emissions and Utilities. As an essential use, medical facility energy use would not be wasteful or inefficient. The HDHS MACC included energy-efficient project design features and plans for wind power. Building water use would be reduced by design in compliance with the Title 24 Green Building Standards and the County Green Building Program. These efforts, combined with compliance with Title 24's energy conservation standards for new construction would help to offset increases. Inefficient or wasteful use of energy was not expected, and impacts were less than significant.

### 2023 Parcel B Revisions

#### *Construction*

The California Green Building Standards Code (CALGreen Code) establishes mandatory measures for new non-residential buildings, which includes requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The 2023 Parcel B Revisions would

comply with or exceed the applicable provisions of the Title 24 Building Standards Code and the California Green Building Standards in effect at the time of building permit issuance.

The 2023 Parcel B Revisions would also use construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Therefore, the 2023 Parcel B Revisions would also meet or exceed the required level of waste recycling and reuse rate for construction and demolition debris. Therefore, the 2023 Parcel B Revisions would not result in the wasteful, inefficient, and unnecessary consumption of energy during construction and would not preempt future energy conservation. As a result, impacts related to construction energy use with the 2023 Parcel B Revisions would be less than significant.

### ***Operation***

Operation of the 2023 Parcel B Revisions would utilize energy in the same way as identified in the Final EIR, for necessary on-site activities and off-site transportation associated with facility employees, patients, and visitors traveling to and from the site. The amount of energy used would not represent a substantial fraction of the available energy supply in terms of equipment and transportation fuels. The 2023 Parcel B Revisions would also meet or exceed energy standards by incorporating green building measures consistent with the County's 2019 Sustainability Plan and Climate Action Plan (CAP) that is currently in preparation. Overall, the 2023 Parcel B Revisions would provide for energy and water efficiency. The 2023 Parcel B Revisions would comply with the mandatory measures for new non-residential buildings. The 2023 Parcel B Revisions would also meet or exceed the applicable provisions of Title 24 and the California Green Building Standards in effect at the time of the building permit issuance. As a result, impacts would be the same as those for the HDHS MACC overall and less than significant.

### ***Conclusion***

Impacts with respect to wasteful use of energy and consistency with applicable renewable energy and/or energy efficiency plans would be similar for the 2023 Parcel B Revisions as for the HDHS MACC overall and would be less than significant and no changes to or additional mitigation is required.

## **G. GEOLOGY AND SOILS**

Impacts with respect to geology and soils of the currently proposed 2023 Parcel B Revisions were evaluated with regard to the Final EIR and required mitigation measures. The potential for the currently proposed 2023 Parcel B Revisions to result in new or substantially more adverse significant impacts to geology and soils was evaluated in relation to six questions recommended for consideration by the *State CEQA Guidelines*.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the project area. Analysis of the Appendix G questions takes in to account the decision from *CBIA v. BAAQMD*. It is noted that, State regulations continue to evolve to address geologic conditions and therefore regulatory requirements address existing conditions and how development must be constructed to address such conditions.

<b>Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:</b>		
<p>(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:</p> <p>i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.</p> <p>ii) Strong seismic ground shaking?</p> <p>iii) Seismic-related ground failure, including liquefaction?</p> <p>iv) Landslides?</p> <p>(b) Result in substantial soil erosion or the loss of topsoil?</p> <p>(c) Being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed 2023 Parcel B Revisions, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?</p> <p>(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</p> <p>(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?</p> <p>(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Final EIR

### *Construction and Operation*

#### Seismic Hazards

There are no known active or potentially active faults traversing the HDHS MACC site, nor is the HDHS MACC site included within an Alquist-Priolo Earthquake Fault Zone. As with most areas of Southern

California, the project area may experience strong ground shaking from a major earthquake on nearby faults (the San Andreas fault is located 9 miles south of the site), or other active regional faults in the Southern California area. The depth to groundwater at the site is expected to be substantially greater than 50 feet. The site is not located within an area designated susceptible to liquefaction on the CGS *Seismic Hazard Zone Map of the Lancaster East Quadrangle* and therefore the potential for liquefaction was considered low and the potential for lateral spreading was also considered low. The potential for seismically induced settlement at the HDHS MACC site was calculated in accordance with CGS guidelines and was estimated to be less than one inch. Therefore, the risk of settlement and differential compaction was concluded to be low. Impacts from seismic related hazards were considered less than significant in the Final EIR.

### **Soil Erosion**

The Final EIR indicates that ground disturbance, including over-excavation, utility trenching, and foundation excavation during construction activities on exposed soils, could lead to erosion during heavy rains. Implementation of the planned Erosion Control Plan would prevent sediment transport and loss of topsoil from the HDHS MACC site to off-site areas. As a result, impacts of the HDHS MACC (Parcels A and B) were identified as less than significant. During long-term operation of developments and improvements on the site, provisions for surface drainage and incorporation of appropriate BMPs (filtration, runoff-minimizing landscaping for common areas, energy dissipaters, inlet trash racks, and water quality inlets) would reduce the potential for soil erosion at the site. Additionally, stormwater and low impact development (LID) features (i.e., bioretention and wetland/detention areas) were anticipated to also minimize runoff and the potential for soil erosion. Therefore, operational impacts were identified as less than significant.

### **Soil Conditions**

Based on review of historic aerial photographs of the project area and review of subsidence-related geotechnical data for sites within the Antelope Valley, the Final EIR indicated that there was no evidence of ground fissures at the project site. Also, substantial quantities of groundwater were not being extracted in the immediate project area. Therefore, the risk of subsidence at the project site was identified as low.

Collapsible soils undergo settlement with the addition of water, even without the application of additional load. This process is also known as hydrocompaction. Laboratory testing of on-site soil samples indicated a low to negligible potential for collapse.

Corrosion is a chemical process whereby buried construction materials in contact with certain types of soils are attacked by either oxidation, reduction, or other soil-induced chemical reactions. Laboratory testing of on-site, near-surface soils existing on-site soils were considered moderately to severely corrosive to

concrete, and severely corrosive to buried metals; MM 4.5-1 requires additional testing at the completion of rough grading to confirm the type of cement required for concrete to be placed in contact with on-site soils and requires consultation with a corrosion engineer to determine the most appropriate corrosion protection measures at the site. Additionally, if porous pavement is to be used on-site, MM 4.5-1 requires additional percolation testing of subgrade soils to be performed to determine the feasibility of storm water infiltration. Expansive soils are prone to expanding when exposed to water and contracting with a decrease in water content, which can cause damage to overlying structures. Based on laboratory testing the project site has a medium expansion potential. With implementation MM 4.5-1, impacts related to soil conditions were identified as less than significant.

### **Use of Septic Tanks**

The site is in an urbanized area with wastewater infrastructure already in place. The HDHS MACC facilities were anticipated to connect to existing off-site infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impacts were identified with respect to septic systems.

### **Paleontological Resources**

(The Final EIR addressed Paleontological Resources under Cultural Resources.) The Final EIR indicates that older Quaternary alluvium underlying the site may contain fossil vertebrate remains. Shallow grading would be unlikely to impact significant vertebrate fossils, but deeper excavations that extend into older deposits could unearth vertebrate remains. Excavations on the site were anticipated up to approximately 15 feet and it would be possible to encounter older Quaternary Alluvium at that depth. Excavations extending into the older Quaternary Alluvium would require monitoring by a qualified Paleontologist to recover any fossil remains, as outlined in MM 4.4-2. With implementation of MM 4.4-2, there would be less than significant impacts to paleontological resources associated with short-term construction activities. No further excavation is anticipated during operation and therefore no impacts were identified for operation.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

#### **Seismic Hazards and Soil Conditions**

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with assumptions in the Final EIR. Potential impacts related to ground rupture, earth shaking and liquifiable or unstable soils are impacts of the environment on the project; the project would not exacerbate this impact and impacts would continue to be less than significant.

There are no slopes on the site that could result in the potential for landslides and mudflows. Therefore, impacts related to landslides and mudflows would be less than significant, the same as for the rest of the site as evaluated in the Final EIR.

### **Soil Erosion**

Construction projects that result in ground disturbance of 1 acre or more must apply for a Stormwater General Permit under the National Pollutant Discharge Elimination System (NPDES). All construction is required to follow best management practices (BMPs) to prevent erosion that might move off-site, as required under the Stormwater Pollution Prevention Plan (SWPPP) for compliance with State Water Resources Control Board NPDES Construction General Permit 2009-0009. In accordance with existing regulations, a SWPPP would be prepared to identify BMPs that would be implemented to prevent construction area runoff and sediment from entering the storm drain system. Implementation of BMPs would ensure that sediment would be confined to the construction area and not transported off-site. The 2023 Parcel B Revisions would be required to comply with the County NPDES permit and implement the SWPPP for erosion control. It would also implement BMPs to address water- and wind-related erosion and would include relatively gentle slopes. Therefore, potential soil erosion impacts during construction would be less than significant. BMPs related to ongoing drainage design and maintenance practices would also be included in the SWPPP and implemented to reduce soil erosion during operation of the 2023 Parcel B Revisions. The design of the 2023 Parcel B Revisions would also address soil erosion through design procedures such as appropriate surface drainage design of roadways and facilities to provide for positive surface runoff. It would also comply with the County's Low Impact Development (LID) ordinance. Therefore, impacts would be the same as identified in the Final EIR; impacts related to soil erosion and loss of soil would be less than significant.

### **Use of Septic Tanks**

The 2023 Parcel B Revisions would connect to the existing sewer system and would have no impact related to septic tanks and alternative waste disposal systems.

### **Paleontological Resources**

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

## ***Conclusion***

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

## **H. GREENHOUSE GAS EMISSIONS**

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

Under CEQA, project evaluation of GHG emissions can “tier off” a programmatic analysis of GHG emissions, such as the proposed Los Angeles County’s CAP, which, once adopted, will meet the *State CEQA Guidelines* Section 15183.5 requirements for a qualifying programmatic analysis.<sup>1</sup> The County has also adopted Title 31 of the County’s Code of Ordinances (the Los Angeles County Green Building Code), which adopts by reference the CALGreen Code except as modified by Title 31. In addition, the County of Los Angeles General Plan provides recommendations for emission reduction strategies for GHG emissions. As such, if a project is designed in accordance with these policies and regulations, it would result in a less-than-significant impact, because it would be consistent with the overarching local and regional plans and regulations for reducing GHG emissions.

As noted in Air quality above, the AVAPCD adopted new CEQA Guidelines in 2016 that identify thresholds of significance for GHG (CO<sub>2</sub>e) emissions (100,000 tons per year, 548,000 pounds per day). These thresholds are much higher than the threshold used in the Final EIR (900 tons per day). This Addendum continues to use the threshold as identified in the Final EIR. The 900 MTCO<sub>2</sub>e/year was a screening threshold identified in a 2008 California Air Pollution Control Officer’s Association (CAPCOA) Document, *CEQA and Climate Change*. More recent environmental documents are moving more towards a policy consistency analysis rather than an absolute number to identify the level of project impact. Key policies include those that reduce vehicle miles travelled including transit adjacency and parking strategies to reduce single-occupancy vehicle use as well as Low Impact Development and green building requirements.

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<sup>1</sup> In 2015 the County adopted its first Climate Action Plan (CAP) -- designed to sunset in 2020. Following and building on the CAP, the County adopted (August 6, 2019) the Our County, Los Angeles Countywide Sustainability Plan. The updated LA County Climate Action Plan, is currently in preparation.

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

## Final EIR

### *Construction and Operation*

#### Emissions

For purposes of analysis, GHG emissions during construction are amortized over the lifetime of the building(s) and evaluated as part of long-term operations. Long-term operation of the HDHS MACC facilities were anticipated to result in GHG emissions from fuel combustion (i.e., from on-road motor vehicles traveling to and from the site); natural gas, electricity, and water consumption; and wastewater and solid waste generation. Total annual GHG emissions due to the HDHS MACC were calculated to be 13,412 MTCO<sub>2</sub>e/year, exceeding the 900 MT CO<sub>2</sub>e threshold identified in the Final EIR. Thus, impacts with respect to the generation of GHG emissions were considered to be cumulatively significant and unavoidable.

#### Plans and Policies

The Final EIR indicated that the project would comply with the County Green Building Ordinance that requires project designs and practices that result in the reduction of GHG emissions and incorporate energy- and water-efficiency features. The impact relative to consistency with plans and policies was considered less than significant with mitigation measure MM 4.6-1 (energy efficient lighting and recycling facilities) and 4.2-1 (promote ride sharing).



## **2023 Parcel B Revisions**

### ***Construction and Operation***

#### **Emissions**

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. The Parcel B Revisions would result in total development on the site being less than anticipated in the Final EIR. In addition, energy efficiency regulations and vehicle emission control regulations have reduced GHG emissions compared to what was anticipated in the Final EIR. Nonetheless, total emissions for the project site as a whole (Parcels A and B) including the 2023 Parcel B Revisions, could continue to exceed the 900 MTCO<sub>2</sub>e/yr threshold and therefore emissions would be conservatively considered significant and unavoidable.

#### **Plans and Policies**

The 2023 Parcel B Revisions construction GHG emissions would be less than to those evaluated in the Final EIR for Parcel B (because less total development would occur on Parcel B). Furthermore, as noted in Regulatory Requirements (RR) 4.6-1 through 4.6-3 in Appendix A to this Addendum, the County would comply with the most recent applicable regulations and policies regarding building energy efficiency, green building requirements, Low Impact Development, and vehicle trip reduction. As a result, the 2023 Parcel B Revisions would not conflict with applicable plans and policies including the updated Climate Action Plan currently in the process of being reviewed and adopted. The 2023 Parcel B Revisions would not be expected to conflict with the County's ability to achieve the targets included in the Los Angeles County Climate Action Plan that is currently in the process of being reviewed and adopted. The 2023 Parcel B Revisions would incorporate the same mitigation measures (MM 4.6-1 and MM 4.2-2) as included in the Final EIR.

### ***Conclusion***

Impacts related to GHG emissions would be less with the 2023 Parcel B Revisions because total development on Parcel B would be less than half that anticipated in the Final EIR. Nonetheless impacts relative to emissions having a significant impact on the environment are conservatively considered to remain cumulatively significant and unavoidable for the purposes of this addendum. Impacts related to GHG reduction plans and policies would be less than significant and no changes to or additional mitigation is required.

## I. HAZARDS AND HAZARDOUS MATERIALS

Hazards and hazardous materials of the currently proposed 2023 Parcel B Revisions were evaluated based on a review of the Final EIR. The potential for the currently proposed 2023 Parcel B Revisions to result in new or substantially more adverse significant impacts related to hazards and hazardous materials was evaluated in relation to seven questions recommended for consideration by the *State CEQA Guidelines*.

Hazardous waste can pose a potential or substantial hazard to human health or the environment when improperly managed. Designated hazardous waste possesses at least one of four defined characteristics—ignitability, corrosivity, reactivity, or toxicity—or appears on special U.S. Environmental Protection Agency lists.

Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		
(b) Creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		
(c) Emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		
(d) Being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Final EIR

#### *Construction and Operation*

##### Routine Transport and Use

The Final EIR indicates that construction activities would have the potential to encounter PCBs that may be contained within the existing pole-mounted transformers located on the site. These products, although having fire-resistant and other properties required for use in electrical equipment, have been shown to be toxic, non-biodegradable, and persistent in the environment and to accumulate in fatty tissues in the body, and are suspected of being carcinogenic. Coordination with SCE would facilitate compliance with all applicable requirements of the Toxic Substances Control Act during the use, removal, relocation, and/or

servicing of the existing transformers during project construction (MM 4.7-1). With this mitigation measure impacts were identified as less than significant.

Operation of medical facilities, such as the HDHS MACC, involves the routine transport, use, and disposal of hazardous materials (e.g., pharmaceutical products, medical gases, fuel oil, hydraulic fluids, diesel, medical and biological wastes, radioisotopes and x-ray producing machines, cleaners, and solvents). This would include the use of hazardous materials for various medical procedures, facility maintenance, medical wastes generation, and a 10,000-gallon underground storage tank (UST) to store diesel fuel to power a back-up generator to ensure continuous power in the event of an emergency or power outage.

The Materials Management Building is a separate building adjacent to the Main Ambulatory Care Building, to contain hazardous materials and wastes; medical vacuum pumps; air compressors; and other medical, surgical and general supplies and wastes. Plans included a segregated storage area for medical gas tanks northwest of this building. The Final EIR identified less than significant impacts related to hazards associated with potential spills, accidents, fire, and explosions on the visitors and employees within the Main Ambulatory Care Building. Additionally, fire sprinkler systems, fire alarm systems, smoke detectors, visual strobe units, and/or fire alarm speakers were proposed in all buildings. As such, there would be a less than significant impacts related to adequate emergency notification in case of a fire or other emergency circumstance. The Central Plant includes the main electrical room, a standby emergency diesel engine generator, cooling towers, chillers, boiler room, underground fuel oil tank, electric transformer, and switch pad. This building would be fully secured with locks and gates for protection with no need for public access.

Health care facilities in California are licensed, regulated, inspected, and/or certified by a number of public and private agencies at the State and federal levels. In particular, the Department of Public Health (DPH) Licensing and Certification Program is responsible for ensuring health care facilities comply with State laws and regulations. The HDHS MACC is required to obtain required licenses/permits for the operation of the facility, including those needed for the laboratories, radiologic equipment, medical devices, workplace safety, radioactive materials, and certified professionals. Health care professionals at the HDHS MACC are also licensed individuals, where necessary. Thus, no public health hazards associated with the day-to-day operations of the HDHS MACC were anticipated.

In addition, there are numerous regulations pertaining to the management of hazardous materials, including medical wastes and fuel to be stored in the UST. These regulations would require permits, disclosure and inventory, spill prevention and response plans, monitoring and inspections, spill reporting, emergency procedures, employee training, remedial actions, and other compliance measures to prevent the release of hazardous materials into the environment. Therefore, the Final EIR identified less than

significant impacts related to the routine transport, use, disposal, and storage of hazardous materials with compliance with all applicable existing regulations, and no mitigation was required.

### **Accidents and Release of Hazardous Materials, and Contaminated Sites**

Compliance with the federal, State, and local requirements was found to reduce the risk of damage or injury from the risk of accidental release of hazardous materials. There are no recognized environmental conditions on the site.

### **Hazardous Emissions Near Schools**

There are five schools located within approximately one-quarter mile of the site (Parcels A and B). As indicated above, numerous regulations pertaining to management of hazardous materials would apply to the operation of the project. The DPH is responsible for ensuring that health care facilities comply with State laws and regulations. There would be less than significant impacts related to the routine transport, use, disposal, and storage of hazardous materials during operation of the project with compliance with all applicable existing regulations. In addition, compliance with AVAQMD Rules and regulations would require that the proposed diesel generator (with the potential for emissions of criteria air pollutants and toxic air contaminants), is located and operated such that there would be a less than significant impact to schools in the project site vicinity, and no mitigation is required.

## **2023 Parcel B Revisions**

### ***Construction***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed in accordance with assumptions in the Final EIR. The 2023 Parcel B Revisions would use similar construction methods as the 2011 HDHS MACC. Therefore, construction would result in the same potential impacts related to routine transport, accidental upset and release of hazardous materials into the environment.

### ***Operation***

Operation of the 2023 Parcel B Revisions could require the storage, use, and disposal of hazardous materials and waste routinely used in healthcare facilities (although less than the MACC). The potential for upset and accident conditions resulting in the release of these materials is low and related impacts are considered less than significant for the 2023 Parcel B Revisions, the same as for the HDHS MACC as a whole as evaluated in the Final EIR.

## ***Conclusion***

Impacts related to hazardous materials management, upsets and accidents, hazardous materials near schools and hazardous sites would be similar for the 2023 Parcel B Revisions as compared to those identified in the Final EIR and impacts would continue to be less than significant and no changes to or additional mitigation is required.

<b>Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:</b>		
<p>(e) Being located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the Project Area?</p> <p>(f) Impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan?</p> <p>(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?</p>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

#### **Airport Proximity**

The site is not located within two miles of an airport or airstrip. The nearest aviation facility is the General William J. Fox Airfield (4555 West Avenue G in Lancaster), a general aviation airport located approximately five miles northwest of the project site (American Airports Corporation 2008). The Palmdale Regional Airport, located within Air Force Plant 42, is located approximately five miles south-southeast of the site. The Edwards Air Force Base is located approximately 21 miles to the northeast of the project site. Further evaluation of this issue in the Draft EIR is not required, and no mitigation is necessary.

#### **Emergency Response Plans**

Construction on the sites could temporarily impact adjacent roadways during construction. However, the City of Lancaster has an adopted Emergency Operations Plan that details the responsibilities of private organizations and federal, State, and local agencies in the event of disaster. Construction traffic would be

managed in compliance with the current California Department of Transportation (Caltrans) *California Manual on Uniform Traffic Control Devices* and applicable City requirements to reduce temporary traffic impacts to below the level of significance. As such, roadways that provide access to the project site and the surrounding areas would not be impacted during project construction in such a way that would physically impair or impede emergency response or evacuation within the City of Lancaster. The Final EIR found no impact.

## **Wildfire**

The project site is located in a developed area of the City of Lancaster and is not adjacent to wildlands or in or near areas designated as a Very High Fire Hazard Severity Zone (VHFHSV) by the County of Los Angeles Fire Department, which provides fire protection services to the City. Therefore, the proposed project would not result in a significant risk of loss, injury, or death involving wildland fires.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

The nearest airports remain more than two miles away and impacts remain less than significant.

The 2023 Parcel B Revisions would use the same construction methods on the same site as evaluated in the Final EIR and the same regulations would continue to apply. The 2023 Parcel B Revisions would not adversely affect existing emergency access routes, emergency response plans or emergency evacuation plans. Operation of the 2023 Parcel B Revisions would similarly comply with applicable regulations and would not be expected to create a significant hazard to the public or environment and impacts would be less than significant.

## **Wildlands**

The project is in an urban area and not near wildlands and therefore there would continue to be no impacts related to wildland fires.

## ***Conclusion***

Impacts related to airport safety, emergency response plans and wildland fires would be similar for the 2023 Parcel B Revisions as compared to those identified in the Final EIR and no changes to or additional mitigation is required.

## J. HYDROLOGY AND WATER QUALITY

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

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

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

### Final EIR

#### *Construction and Operation*

##### Water Quality Standards and Groundwater

The Final EIR indicates storm water runoff during construction could contain pollutants such as soils and sediments that are released during grading and excavation activities and petroleum-related pollutants due to spills or leaks from heavy equipment and machinery. Other common pollutants that may result from construction activities include solid or liquid chemical spills; concrete and related cutting or curing

residues; wastes from paints, stains, sealants, solvents, detergents, glues, acids, lime, plaster, and cleaning agents; and heavy metals from equipment.

Construction activities that disturb one acre or more of land are required to obtain an NPDES permit from the State Water Resources Control Board (SWRCB), Division of Water Quality. The Best Management Practices (BMPs) set forth in the Storm Water Pollution Prevention Program (SWPPP) and implemented during construction activities that are most often used include: (1) erosion-control BMPs such as hydraulic mulch, soil binders, and geotextiles and mats to stabilize soils; (2) temporary drainage swales to divert runoff from exposed soils; (3) sediment controls such as fiber rolls along disturbed areas, temporary desilting basins, and gravel bags around storm drain inlets; (4) watering of exposed soils and covering stockpiles of soil; (5) stabilization of construction entrance/exit points to reduce tracking sediments; and (6) timing of grading to avoid the rainy season (November through April).

There would be less than significant short-term, general construction-related water quality impacts to surface water and to groundwater impacts through compliance with the requirements of the NPDES Construction General Permit, County Code Chapter 12.80, and NPDES Permit No. CAG996001 "General Permit for Limited Threat Discharges to Surface Waters" with no mitigation required.

Potential pollutants that could be generated by the operation of the project could include but are not limited to bacteria/viruses, heavy metals, nutrients, pesticides, organic compounds, sediments, trash and debris, oxygen-demanding substances, and oil and grease. These pollutants would come from landscaped areas, trash enclosures, equipment areas, and parking areas that would be developed on the site.

The Final EIR found that compliance with applicable regulations (including LID and SUSMP), would ensure operational impacts would be less than significant.

## **2023 Parcel B Revisions**

### ***Construction***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. The 2023 Parcel B Revisions would use the same construction methods as assumed in the Final EIR and construction activities could result in accidental spills or disposal of potentially harmful materials that could wash into and pollute surface waters or groundwater. These activities would expose soils for a limited time, allowing for possible erosion and sediments to enter into sheet flow runoff, which could enter the existing storm drain system untreated. The 2023 Parcel B Revisions would be required to comply with the same regulations and obtain the same permits. Compliance with these permits and requirements would prevent a substantial violation of water



quality standards and minimize the potential for contributing additional sources of polluted runoff during construction, just as identified in the Final EIR.

As indicated in the Final EIR, existing regulations, programs, and policies would ensure that water quality impacts and impacts to groundwater would remain less than significant. Regulations (including NPDES Construction General Permit, SWPPP BMPs and LID requirements) would ensure construction activities would not degrade surface water quality and would not substantially impact groundwater recharge. These regulations would result in no exceedance of water quality standards during construction of the 2023 Parcel B Revisions, in the same way as evaluated in the Final EIR and therefore impacts would remain less than significant impacts with respect to water quality and groundwater.

### ***Operation***

Operation of the 2023 Parcel B Revisions would result in impacts as described in the Final EIR. It would incorporate LID measures and adhere to the same regulations regarding runoff. Accordingly, operation of the 2023 Parcel B Revisions would not result in a violation of any water quality standards or waste discharge requirements, would not create substantial additional sources of polluted runoff, and would not substantially degrade water quality (see also discussion of drainage below). The 2023 Parcel B Revisions would increase water demand compared to existing conditions due to the intensified use of facilities, increased number of employees and patients, and greater amount of landscaping, but the increase would be less than anticipated in the Final EIR due to the reduced area of buildings on Parcel B. The same kind of code-compliant water fixtures and the same type of LID features would be included, and the same kind of drought-resistant and California native plants would be used for the 2023 Parcel B Revisions. As such, the 2023 Parcel B Revisions would not substantially impact groundwater recharge on the site. Impacts of the 2023 Parcel B Revisions regarding water quality and groundwater recharge would be similar to those anticipated in the Final EIR.

### ***Conclusion***

Impacts related to water quality, waste discharge and groundwater recharge would be similar for the 2023 Parcel B Revisions as compared to those evaluated in the Final EIR and no changes to or additional mitigation is required.

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

## Final EIR

### *Construction and Operation*

The Final EIR indicates the project would comply with storm water quality BMPs in accordance with the Los Angeles County Department of Public Works Standard Urban Stormwater Mitigation Plan (SUSMP) and Low Impact Development (LID) Standard Manual.

The Final EIR indicated that the project would change the drainage patterns within the site, as impervious surfaces are created and storm water is directed away from structures. The site was undeveloped and consisted of largely pervious soils. Development would convert the site from largely pervious soils to a largely impervious, paved surface with storm drain infrastructure intended to direct flows into the existing storm drain system. Standard construction-phase BMPs would decrease the potential for any significant erosion or sedimentation from soil disturbance associated with construction of the project. In addition, standard construction practices related to erosion and sediment control would be required as part of the permitting process. Construction-related erosion and sedimentation impacts resulting from soil disturbance would be less than significant after implementation of the SWPPP and the BMPs required to control erosion and sedimentation. The changes to drainage associated with the development would not result in future erosion or siltation due to the lack of exposed soils.

The project is required to comply with the County's LID requirements through the installation of storm drain infrastructure and BMPs that promote storm water infiltration, including bioswales and an underground perforated corrugated metal pipe detention and infiltration system Prior to development

ponding occurred along the northern side of the site. The project included re-grading the site to eliminate on-site ponding. The pre-development runoff rate from a 25-year, 24-hour storm event was estimated to be 1.59 cubic feet per second (cfs), and the post-development runoff rate was estimated to be 6.82 cfs. Thus, the required volume to detain excess runoff was calculated to be 9,109 cubic feet. The required first flush volume was calculated at 26,334 cubic feet, which required treatment under the SUSMP to be accommodated within the underground detention and infiltration. The storm drain system was designed to direct runoff from the on-site drainage infrastructure toward the underground detention and infiltration system. The system would consist of perforated corrugated metal pipes planned to hold 25,413 cubic feet of storm water for slow infiltration into the ground. In addition, bioswales were proposed in the parking areas which would allow for ground percolation and reduction in runoff volumes and rates of at least 921 cubic feet. During heavy rains, overflows from the detention basin were anticipated to enter an earthen channel that flows toward Rosamond Dry Lake.

Compliance with existing regulations would ensure that impacts related to drainage and flooding would be reduced to a less than significant level.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. The 2023 Parcel B Revisions would require similar grading and drainage as anticipated in the Final EIR. The same standard construction-phase BMPs for compliance with NPDES requirements, including a Construction General Permit and SWPPP, would decrease the potential for any significant erosion or sedimentation from soil disturbance associated with construction, so any erosion and sedimentation would be localized and temporary. With the implementation of these measures to control erosion and sedimentation, construction-related erosion and sedimentation impacts resulting from soil disturbance would be less than significant for the 2023 Parcel B Revisions.

For each project component, the County is required to identify and implement appropriate LID compliance features and practices and structural BMPs. Therefore, 2023 Parcel B Revisions operations would have less-than-significant impacts related to erosion and sedimentation, the same as for the 2011 HDHS MACC.

Neither construction nor operations would substantially alter existing topography, affect the course of any streams or rivers, or increase surface runoff in a manner that would result in flooding. Therefore, the impacts on existing drainage would be less than significant, the same as described in the Final EIR.

The 2023 Parcel B Revisions would increase the pervious area, include an integrated stormwater management approach, and implement County LID requirements requiring stormwater detention on site as appropriate. The volumes of runoff discharge to the County's storm drain system following buildout of the 2023 Parcel B Revisions would be similar to what was anticipated in the Final EIR. Therefore, impacts of the 2023 Parcel B Revisions related to stormwater capacity and quality would be the same as indicated in the Final EIR, less than significant.

### ***Conclusion***

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

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

### **Final EIR**

#### ***Construction and Operation***

The Final EIR indicates that the project site is not located within a 100-year flood zone on the official Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (Community Panel No. 060672 0020 B, Panel 20 of 20). The site is within Zone X- Other Areas, which is outside of the 0.2 percent annual chance floodplain. There are no dams or water bodies located in the vicinity of the site that would subject the site to hazards from a seiche or tsunami. Apollo Lake, a recreational fishing lake located within Apollo Park, is located approximately 7.6 miles to the northwest; Rosamond Lake (within Edwards Air Force Base property) is a dry lakebed located approximately 6 miles to the north; and the Little Rock Reservoir and dam is located approximately 12 miles south.

As discussed under drainage above, the project would be subject to a number of regulations to address water quality and groundwater recharge that would ensure that the project would not obstruct

implementation of a water quality control plan or sustainable groundwater management and that impacts would be less than significant.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. Because of the site location, the 2023 Parcel B Revisions would have no impacts with respect to flood hazard, tsunami, seiche, or associated risk of release of pollutants, as identified in the Final EIR.

### ***Conclusion***

As discussed in the Final EIR, the 2023 Parcel B Revisions would not directly substantially affect groundwater resources. As discussed below under water supply, the long-term availability of groundwater in the area is uncertain (cumulatively significant impact). The 2023 Parcel B Revisions would comply with LID regulations and would not obstruct implementation of a water quality control plan or sustainable groundwater management plan and therefore impacts would be less than significant and no changes to or additional mitigation is required.

## **K. LAND USE AND PLANNING**

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

<b>(a) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to the potential to physically divide an established community?</b>		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

The site was vacant prior to initiating the project; the HDHS MACC would not introduce a land use that could divide the established neighborhoods to the north and east and therefore no impact was identified.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. The 2023 Parcel B Revisions would include uses consistent with the existing medical uses on the balance of the site.

### ***Conclusion***

The 2023 Parcel B Revisions would not physically divide an established community and would result in no impact related to physical division of an established community, the same as the 2011 HDHS MACC and no changes to or additional mitigation is required.

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

## **Final EIR**

### ***Construction and Operation***

The project was identified as consistent with the City's Office Professional (O-P) designation and zoning and would not require a General Plan amendment or zone change. The project would not conflict with any applicable plans, policies, or regulations related to land use.

## 2023 Parcel B Revisions

### *Construction, Operation and Conclusion*

The 2023 Parcel B Revisions would have similar land uses as evaluated in the Final EIR for Parcel B. Therefore, there would continue to be no impacts related to consistency with applicable land use plans, policies, and regulations and no changes to or additional mitigation is required.

## L. MINERAL RESOURCES

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

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

## Final EIR

### *Construction and Operation*

The project would negligibly increase demand for mineral resources. The project area does not contain mineral resources. As a consequence, no impacts to mineral resources were identified in the Final EIR.

## 2023 Parcel B Revisions

### *Construction, Operation and Conclusion*

The proposed 2023 Parcel B Revisions would be within the same site as evaluated in the Final EIR and therefore would have no impacts with respect to mineral resources the same as identified in the Final EIR and no changes to or additional mitigation is required.

## M. NOISE

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

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

## Final EIR

### Construction

The Final EIR indicated that the distance from the nearest residential home to the center of Parcel A was approximately 525 feet and the nearest sensitive receptors to Parcel B were the single-family homes located as close as 60 feet north of East Avenue H-14. Additional receptors were identified approximately 80 feet east of the Parcel B boundary across 5th Street East.

The Final EIR indicated that noise levels could reach approximately 86 dBA Lmax at the nearest receptor 60 feet away and that equipment operating 225 feet away (near the western edge of Parcel B), the noise level would be 75 dBA Lmax, which is the County standard. Noise levels would be lower at locations farther away.

Noise level measurements were taken near the homes adjacent to Parcel B and were measured as 52 to 60 dBA Leq. Construction activities would be heard above the existing noise levels and may create occasional short-term annoyance during demolition and grading activities for the identified sensitive receptors within and in proximity to the Parcel B area. At the conclusion of grading, less heavy equipment would be used, and noise levels related to construction activity would be reduced. MM 4.9-1 requires the construction of temporary noise barriers between grading areas and the nearest sensitive receptors. The noise barriers were required to be constructed on the northern property line along Avenue H-14 from the corner of 4th Street



East to the corner of East Avenue H-14, and along the eastern property line facing 5th Street East from East Avenue H-14 to East Avenue I. The noise barriers are designed to reduce grading or other operations requiring diesel engine equipment that would occur on Parcel B within 225 feet of sensitive receptors. The barriers would be 12 feet high to provide a noise reduction of approximately 13 dBA when the equipment is operating close to the barrier. Therefore, noise levels at the nearest receptors would be 72 dBA Lmax, which is below the County's 75 dBA Lmax noise standard.

Primary noise sources associated with building construction include mostly stationary noise sources such as air compressors, generators, and tower cranes. To meet the County of Los Angeles 60-dBA Lmax standard for stationary equipment operating for 10 consecutive days or more, the operations of stationary equipment within 630 feet of a sensitive receptor must comply with noise-reduction measures included in MM 4.9-2 that requires that no stationary equipment be operated within 115 feet of a sensitive noise receptors and specifies noise-reduction measures (e.g., silencers, enclosures, curtains, or other devices) to limit the equipment noise at the nearest residences to 60 dBA Lmax. With implementation of MM 4.9-2, the County standard would not be exceeded and the impact would be less than significant.

Construction noise would also be generated on local roadways by construction workers commuting to and from the job site and for material deliveries. MM 4.9-3 requires all construction trucks and other vehicles to travel to and from the site via East Avenue I; no construction traffic or queuing was allowed on 3rd Street East north of the site, on 5th Street East north of the site, or on East Avenue H-14. With implementation of MM 4.9-3, construction traffic would not result in a substantial increase in traffic noise at sensitive receptors along residential roadways in the site vicinity, and impacts would be less than significant.

## ***Operation***

The Final EIR indicates that the project would increase the noise levels along 3rd Street East from East Avenue I to East Avenue H-14 by 3.8 dBA. The Final EIR indicates that this noise increase would affect a vacant property west of the site that is planned to be developed with future park and recreation facilities. The resulting noise level of approximately 61 dBA CNEL at 50 feet from the centerline of the street would be compatible with park and recreational uses; therefore, there would be no impact. The project-related noise increase to the remaining roadway segments was identified as ranging from 0.0 to 1.3 dBA. The implementation of the project would not cause significant traffic noise increases to off-site receivers adjacent to roadway segments; therefore, impacts were identified as less than significant.

Due to a distance of approximately 500 feet from buildings on Parcels A and B, stationary noise from mechanical equipment, truck loading, and the operation of wind turbines in parking lot areas was

anticipated to be generally overshadowed by traffic noise on East Avenue I. Therefore, stationary noise impacts from stationary sources would be less than significant.

Due to low traffic volumes and speeds on 4th Street East and 5th Street East, vehicular noise ingress/egress to the site would be less significant at the nearest homes. In addition, the Final EIR indicated that truck deliveries noise would not exceed the 65 dBA City of Lancaster noise ordinance standard at the nearest noise-sensitive receptors. Noise from truck deliveries would be sporadic, occurring for short time periods and be barely perceptible to the residents north of the site, resulting in less than significant noise impacts.

The Final EIR indicated that noise from mechanical equipment noise including maintenance activities at the Building Crafts structure, the operation of Heat Ventilation and Air Conditioning (HVAC) units, and the operation of the Cooling and Heating Plant would be less than significant.

The analysis of wind turbine noise indicates that less than significant noise impacts would occur at nearby homes from the operation of wind turbines, MM 4.9-4 requires the preparation of an acoustical study prior to approval/permitting to demonstrate that the noise from all wind turbines (including Parcel A and Parcel B) would not exceed applicable guidelines. With incorporation of MM 4.9-4, noise impacts associated with the possible implementation of wind turbines were identified as less than significant.

## **Vibration**

### *Construction*

The Final EIR indicates that use of heavy-duty grading equipment would result in vibration. Vibration levels were expected to be less than 0.024 in/sec ppv at the closest residence, which is considered barely perceptible and would not result in structural damage at nearby homes. Construction-related vibration impacts were identified as less than significant, and no mitigation was required.

### *Operation*

No vibration impacts were identified for operation.

## **2023 Parcel B Revisions**

### *Construction*

Sensitive receptors that could be impacted by the Parcel B Revisions have not changed from those identified in the Final EIR. The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed in accordance with assumptions in the Final EIR (and the on-site

hospital uses could be sensitive to noise but as they are components of the project such impacts are not addressed in the CEQA document). Construction of the 2023 Parcel B Revisions would use the same equipment and methods and be in the same location as evaluated in the Final EIR. Construction of the 2023 Parcel B Revisions would require the use of the same type of mobile heavy equipment and methods in the same general locations. Construction-related noise levels at sensitive receptors are expected to be generally the same and would continue to be less than significant with mitigation. Specifically, MM 4.9-1 through MM 4.9-5 would be implemented during construction of the 2023 Parcel B Revisions.

### ***Operation***

The Parcel B Revisions would result in less development on Parcel B and therefore less total development than anticipated in the Final EIR and therefore operational traffic would be less. The Final EIR indicates that the increase in noise related to project-generated traffic would be less than significant. Therefore, with less traffic, the 2023 Parcel B Revisions operational traffic noise impacts would also be less than significant. Other impacts related to operation (stationary equipment, access, deliveries, mechanical equipment, wind turbine – if built) would result in similar noise levels to those identified in the Final EIR and would continue to be less than significant.

### **Vibration**

#### *Construction*

Groundborne vibration levels would be expected to be approximately the same for the 2023 Parcel B Revisions as identified in the Final EIR and would continue to be less than significant at off-site sensitive receptors.

#### *Operation*

As indicated in the Final EIR there would continue to be no impacts with respect to operational vibration.

### ***Conclusion***

Impacts related to noise and groundborne vibration would be similar to, or less than, those identified in the Final EIR. Impacts would continue to be less than significant with mitigation for construction noise and operation noise, and less than significant for vibration (construction and operation). No changes to or additional mitigation is required.

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

## Final EIR

### *Construction and Operation*

The project site is located more than 5 miles from the nearest airport. The nearest aviation facility is the General William J. Fox Airfield (4555 West Avenue G in Lancaster), a general aviation airport located approximately five miles northwest of the project site (American Airports Corporation 2008). The Palmdale Regional Airport, located within Air Force Plant 42, is located approximately five miles south-southeast of the project site. The Edwards Air Force Base is located approximately 21 miles to the northeast of the project site. Therefore, no noise impacts related to airport land use areas would occur.

### 2023 Parcel B Revisions

### *Construction, Operation and Conclusion*

The 2023 Parcel B Revisions would have no impacts related to private and public airport noise, the same as determined for the Final EIR and no changes to or additional mitigation is required.

## N. POPULATION AND HOUSING

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

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

## Final EIR

### *Construction and Operation*

Construction jobs are anticipated to draw from the local labor pool and not have a notable impact on housing demand. Some operational employment was relocated from another facility, other employment would generally be expected to draw from the local workforce be consistent with local and regional forecasts. Therefore, impacts to population growth impacts were determined to be less than significant.

The site was vacant prior to initiating the project. Therefore, the Final EIR identified no impacts with respect to displacement of people or housing.

## 2023 Parcel B Revisions

### *Construction and Operation*

The 2023 Parcel B Revisions would result in impacts similar to those anticipated for the Final EIR, with less-than-significant impacts related to construction employment and associated demand for housing. Therefore, the 2023 Parcel B Revisions would have the same less-than-significant impacts related to population growth during construction as determined in the Final EIR.

The 2023 Parcel B Revisions would have similar or fewer operational population growth and employment and economic opportunities as the 2011 HDHS MACC and the impacts would be the same as determined in the Final EIR, less than significant. The 2023 Parcel B Revisions would have no impacts related to displacement of housing or people because no housing or population would be removed.

## ***Conclusion***

Impacts related to population and housing would be similar for the 2023 Parcel B Revisions as compared to those identified in the Final EIR.

## **O. PUBLIC SERVICES**

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

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

## **FIRE AND POLICE PROTECTION**

### **Final EIR**

#### ***Construction***

The Final EIR indicates that demand for fire and police protection services during construction activities would be increased over conditions existing prior to the start of the project. The project would be constructed in accordance with all County Fire Code requirements, including standards for building construction, emergency access, fire flow, water main, and fire hydrants. The Los Angeles County Fire Department (LACFD) will be provided all building plans for review and approval, and inspections for compliance with fire safety regulations shall be completed prior to issuance of certificate of occupancy. Less than significant short-term construction impacts related to fire and protection were identified, and no mitigation was required.

## ***Operation***

Implementation of the project was anticipated to slightly increase the demand for fire protection and police protection over conditions existing prior to the project. The project was anticipated to generate a minor increase in LACFD service calls for structural fires, emergency medical and rescue services, hazardous materials inspections and response, and public education activities. The project was anticipated to result in a minor increase in calls to the Los Angeles County Sheriff's Department (LACSD) for service calls that are typical of developed urban areas, including for property crimes (theft, vehicle theft, burglary, arson) and personal crimes (assault, robbery, battery). Compliance with existing regulations was anticipated to result in less than significant long-term impacts related to fire and police protection. Based on consultation with the LACFD and LACSD, no new or physically altered facilities would be required to accommodate the project, and there would be no significant impacts to response times or service ratios. No mitigation was required.

## **2023 Parcel B Revisions**

### ***Construction, Operation and Conclusion***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. The 2023 Parcel B Revisions would similarly be consistent with the assumptions in the Final EIR but would result in less total development on Parcel B which could incrementally reduce demand for fire and police protection. The 2023 Parcel B Revisions would comply with County Code, LACFD and LAFD requirements. The addition of new fire and/or police stations and/or the expansion, consolidation, or relocation of existing facilities would not be anticipated to maintain service.

Impacts related to fire and police protection would be similar to or less than identified in the Final EIR and would be less than significant.

## **SCHOOLS, PARKS, OTHER FACILITIES**

### **Final EIR**

#### ***Construction and Operations***

The Final EIR indicates that with no residential uses proposed on the site that could result in a demand for schools, parks, or other public facilities such as libraries, there would be no impacts to these facilities.

## 2023 Parcel B Revisions

### *Construction, Operations and Conclusion*

The 2023 Parcel B Revisions would not create a demand for schools, parks or other public facilities that would require new or physically altered facilities. Therefore, there would continue to be no impacts related to these facilities.

## P. RECREATION

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

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

## Final EIR

### *Construction and Operation*

No residential uses are proposed on the site and therefore the Final EIR indicates that the project would not increase demand for parks and recreational facilities.

## 2023 Parcel B Revisions

### *Construction, Operation and Conclusion*

The 2023 Parcel B Revisions are consistent with the assumptions for use of Parcel B as evaluated in the 2001 Final EIR; no impacts to recreational facilities are expected.



## Q. TRANSPORTATION

Transportation and traffic impacts of the project were evaluated in light of the Final EIR and the potential for the currently proposed 2023 Parcel B Revisions to result in new or substantially more adverse significant impacts related to transportation and traffic was evaluated in relation to four questions currently recommended for consideration by the *State CEQA Guidelines*. As part of the 2018 *State CEQA Guidelines* updates, the checklist was revised to address consistency with *State CEQA Guidelines* Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The County published a VMT methodology on June, 2020, updated September 2, 2020. The traffic analysis below summarizes the memorandum addressing traffic impacts of the Parcel B Revisions (see **Appendix B**) and addresses impacts of the proposed Parcel B Revisions as compared to the impacts for the HDHS MACC evaluated in the Final EIR. Impacts related to delay and level of service are no longer considered impacts under CEQA (although these issues are still considered as part of the overall planning process).

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

## Final EIR

### Construction

Construction on Parcel A required temporary relocation of a bus stop that had the potential to be inconsistent with policies regarding transit use; mitigation (MM 4.12-1) reduced this impact to a less than significant level. The most intensive phase of construction for worker trips is the building construction phase. While overlapping construction on Parcels A and B was not anticipated, the Final EIR indicates that even if it were to occur, the combined worker and equipment trips of 87 round-trips per day would not be significant and no mitigation would be required.

## ***Operation***

The Final EIR found project operation would increase trips on local roadways (8,488 total daily trips for Parcels A and B, including 2,914 trips on Parcel B). The traffic analysis focused on delay at intersections and found less than significant impacts with respect to delay. Impacts to intersections and levels of service are no longer considered significant under CEQA; traffic impacts are now evaluated based on vehicle miles traveled (VMT). The Final EIR identified five bus transit lines and routes adjacent to or in close proximity to the site, with one of these transit lines (i.e., AVTA No. 11) directly serving the site along the project frontage. AVTA No. 11 provides service for an average (i.e., an average of the directional number of buses during the peak hours) of approximately four buses during the AM peak hour and four buses during the PM peak hour. Projects adjacent to transit have fewer impacts with respect to VMT because some trips can be made by transit rather than car. The project is a public health facility that serves the local area, project impacts were identified as less than significant.

## **2023 Parcel B Revisions**

### ***Construction***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. The 2023 Parcel B Revisions would result in similar or less construction activity overall as compared to that evaluated in the Final EIR because less building area could be constructed. Overall total construction-related trips are anticipated to be less in total and VMT are anticipated to be less in total. Thus, because daily construction activity would be similar, impacts would continue to be less than significant.

### ***Operation***

The 2023 Parcel B Revisions could result in less than half the total building area on Parcel B as compared to what was evaluated in the Final EIR and therefore would result in fewer trips and fewer VMT. Specifically, as a result of the MHUCC and the Parcel B Revisions, using a trip generation rate for medical office buildings (40.89 trips per 1,000 square feet) trips with the Parcel B Revisions from Parcel B (see **Appendix B**) are conservatively estimated to be 1,215 (i.e., less than half of the 2,914 trips identified for Parcel B in the Final EIR). As noted above, the project is located in close proximity to transit. Projects close to transit have fewer impacts with respect to VMT because of reduced trips. In addition, as a health facility providing services to the local community the use is necessary and would reduce the need for patients to seek treatment in facilities further away. Operational traffic impacts continue to be considered less than significant.

## ***Conclusion***

Because of the reduction in net total building area, vehicle trips and VMT would be less under the 2023 Parcel B Revisions than would have occurred under implementation of the 2011 HDHS MACC; impacts would continue to be less than significant and no changes to or additional mitigation is required.

<b>(c) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantially increasing hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

The Final EIR indicates that the project would not include uses or design features that could create traffic hazards and that there would be no impact with respect to this issue.

## **2023 Parcel B Revisions**

### ***Construction, Operation and Conclusion***

The 2023 Parcel B Revisions would not make any changes to the roadway network or any other geometric design that could increase hazards; there would continue to be no impacts related to traffic hazards, the same as in the Final EIR and no changes to or additional mitigation is required.

<b>(d) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to inadequate emergency access?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

## **R. TRIBAL CULTURAL RESOURCES**

Tribal Cultural Resources of the currently proposed 2023 Parcel B Revisions were evaluated with regard to the Final EIR. Assembly Bill (AB) 52 went into effect on July 1, 2015, and requires that for a project for which a Notice of Preparation (NOP) for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project. The Notice of Preparation (NOP) for the Final EIR was published May 4, 2010, and therefore, the lead agency was not required to comply with the requirements of AB 52. AB 52 also required an update to Appendix G of *the State CEQA Guidelines* to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. The potential for the currently proposed 2023 Parcel B Revisions to result in new or substantially more adverse significant impacts to Tribal Cultural Resources was evaluated in relation to two questions recommended for consideration by the *State CEQA Guidelines* (see Section E. Cultural Resources above).

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

Impacts related to Tribal Cultural Resources were not separately addressed from Archeological Resources in the Final EIR and are addressed in Cultural Resources (see Section E. Cultural Resources above). The Final EIR indicated that Tribal consultation under SB 18 would assist in the prevention of impacts on Native American cultural resources.

## S. UTILITIES

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

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

## **Final EIR**

### ***Construction and Operation***

Construction of new infrastructure in and around the site was identified in the Final EIR. The Final EIR indicates that construction activities would require water for dust control, cleaning, concrete work, and other ancillary uses. This water demand was identified as temporary and minor and not requiring new water supplies or entitlement from LACWWD 40. Physical impacts related to the construction of new, on-site infrastructure, were analyzed throughout Final EIR. The primary environmental impacts associated with infrastructure installation were identified as related to air quality and noise, as this component of construction involves mainly grading, excavation, and movement and placement of the infrastructure materials. With regulatory compliance and implementation mitigation measures discussed for Air Quality and Noise, there would be less than significant impacts related to the construction of infrastructure.

The Final EIR indicates the project would generate a demand for water of about 44,827 gpd or 50.2-acre feet per year. LACWWD 40 staff indicated they had accounted for an estimated project site demand of at least 66 afy from previously committed water). The project is required to implement water conservation measures in accordance with the County's Green Building Program.

Based on the anticipated daily water demands, as well as fire flow and pressure requirements, the project would include construction of new water lines.

Based on the Los Angeles County Sanitation Department's (LACSD's) wastewater generation factors, the proposed project could generate approximately 69,500 gpd of wastewater however given this is more than the calculated water demand it is a conservative figure for purposes of sizing facilities. The Final EIR indicated that anticipated flows would be within the capacity of wastewater treatment facilities and that the project would be subject to a sewer connection fee that would contribute towards funding expansion of the sewer system as needed to accommodate regional growth.

The Final EIR indicates that the project would require coordination and approval from the utility suppliers, including in particular Los Angeles County Water Works District 40 (LACWWD 40). The Final EIR indicates that compliance with existing regulations would result in less than significant impacts with respect to relocation or construction of infrastructure.

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

## 2023 Parcel B Revisions

### *Construction and Operation*

The 2023 Parcel B Revisions could require construction of additional infrastructure in and around Parcel B consistent with the assumptions in the Final EIR; demand for water and wastewater could be less than anticipated in the Final EIR because of the reduced size of buildings on Parcel B. Impacts would continue to be less than significant.

### *Conclusion*

After construction of the 2023 Parcel B Revisions, there would be no impacts on utility infrastructure. See Sections regarding water supply and wastewater treatment below and Section J Hydrology, above, regarding impacts on water, wastewater, and stormwater infrastructure capacity, respectively. As discussed in the Final EIR, impacts would be less than significant and no changes to or additional mitigation is required.

<b>(b) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to having sufficient water supplies available to serve the proposed 2023 Parcel B Revisions and reasonably foreseeable future development during normal, dry, and multiple dry years?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Final EIR

### *Construction and Operation*

As discussed above the LACWW 40 indicated that they had planned for more than the anticipated project water demand for this site.

The increased demand for water from future development projects within the City and throughout the Antelope Valley Basin is anticipated to result in increases in water consumption of both groundwater and imported water. Coordination among the wholesale and retail water purveyors, water storage facilities, and sanitation districts will be necessary to assure a dependable water supply. The Final EIR indicated there was an ongoing dispute among various parties as to the priority/superior right to pump the groundwater in the Basin, and the protection of the Basin.

It was anticipated that the ongoing adjudication of groundwater rights would bring the Basin into groundwater supply balance. Local public entities are undertaking necessary water supply steps, (e.g., water recycling, water banking, water conservation, and payment of connection and service fees, as discussed previously) needed to ensure water service to future developments and the continued availability of imported water supplies and groundwater resources. However, the Final EIR indicated that it cannot be stated with certainty how much groundwater will be made available to all entities that currently pump groundwater from the Antelope Valley Basin, including LACWWD 40. As such, it is possible that the adjudication of the Basin could result in an overall reduction in allowed pumping from the Basin, and water suppliers will be required to find alternate means of meeting water demands. As such, the Final EIR indicates that there is the potential that the project's incremental demand for water supply to have a cumulative impact on the water supplies of the Antelope Valley.

## **2023 Parcel B Revisions**

### ***Construction, Operation and Conclusion***

The 2020 Urban Water Management Plan (UWMP) for LACWWD 40 indicates that in December 2015, the Superior Court of California entered a judgment in the *Antelope Valley Groundwater Cases (Santa Clara Case No. 1-05-CV-049053)*, which were the judicial cases of several major parties (including LACWWD 40) that disputed the groundwater rights to the Basin. The Court found that the Antelope Valley Groundwater Basin was in overdraft. In February 2019, the Department of Water Resources in their updated list of groundwater basins in critical overdraft, did not list the Antelope Valley Groundwater Basin because it is adjudicated. As of 2020, the LACWWD-40 has annual groundwater rights to approximately 23,289 acre-feet per year of groundwater from the Basin (including approximately 3,500 acre-feet of unused federal reserve rights, and return flows of 10,400 acre-feet). The UWMP indicates a 2020 total water demand of 46,180 acre-feet per year (including recycled water), and a projected water use in 2045 of 67,602 acre-feet per year (including recycled water). The 2020 water demand included 14,266 acre-feet per year of groundwater use; as a result of the additional adjudicated rights, the UWMP shows future use of 23,289 acre-feet per year of groundwater. The UWMP shows total reasonably available water to LACWWD 40 of 79,033 acre-feet per year (including purchased water, groundwater and recycled water), or approximately 17 percent more than projected demand.

The 2023 Parcel B Revisions would result in less development on the site in total and slightly less demand for water; it would continue to be consistent with zoning for the area and SCAG population and employment forecast on which future water demand forecasts are based. Given the anticipated reasonably available water supply and the decrease in water demand associated with the 2023 Parcel B Revisions, impacts would be reduced compared to those identified in the Final EIR. Nevertheless, as water supply in



California continues to come under pressure as a result of climate change and other factors, this analysis conservatively concludes impacts could continue to remain significant and unavoidable. No changes to or additional mitigation is required.

<b>(c) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to resulting in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operation***

Wastewater originating from the project site is treated at facilities owned and operated by the Los Angeles County Sanitation District No. 14 at the Lancaster Water Reclamation Plant (WRP). The Final EIR indicated that implementation of the proposed land uses (Parcels A and B) would be within the capacity of the WRP. Therefore, construction and operation impacts related to wastewater treatment requirements were determined to be less than significant.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

Because the 2023 Parcel B Revisions would result in less total building area than the 2011 HDHS MACC, wastewater generation could also be reduced.

## ***Conclusion***

Impacts of the 2023 Parcel B Revisions on wastewater would be within those analyzed in the Final EIR and would continue to be less than significant and no changes to or additional mitigation is required.

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

## Final EIR

### *Construction*

Construction of the project was anticipated to result in the generation of solid wastes, which would be composed of excavated soils, green waste, demolition debris, and construction debris. Demolition was anticipated to be primarily related to the removal of existing sidewalks, pavement, utility lines and poles, and streetlights. The Final EIR indicated that the project could generate approximately 1,316 tons would be generated during construction activities. Compliance with the County's Green Building Program and Construction and Demolition Debris Recycling and Reuse Ordinance was expected to reduce this waste volume by at least 65 percent to approximately 461 tons. This short-term and finite demand for landfill space was anticipated to be accommodated by the remaining capacity of the Lancaster Landfill, estimated at approximately 14.8 million tons, and within the landfill's daily capacity limit (1,700 tons). Therefore, the Final EIR indicated that with compliance with regulations during construction of the project, there would be a less than significant impact related to solid waste disposal capacity.

The Final EIR indicated that construction of the project would comply with all applicable construction waste regulations, including the County's Green Building Program and Construction and Demolition Debris Recycling and Reuse Ordinance to reduce construction waste volumes by at least 65 percent. Therefore, the Final EIR identified a less than significant impact related to solid waste regulations.

### *Operation*

The Final EIR indicated that the project would generate solid waste that would generate approximately 866 tons of solid wastes per year (or about 2.4 tons per day). The Final EIR indicates that the project will operate a recycling program for general recyclables and universal recyclables. The project provides for a waste disposal program, including a compactor to reduce the volume of solid wastes; source separation and

recycling to reduce demand for landfill space; and special biohazardous waste handling to prevent hazards to the public and the environment.

The Final EIR identified that the waste hauler for the area could serve the project waste streams and that the Lancaster and Antelope Valley Landfills were not operating at capacity. The Final EIR indicated that the Lancaster Landfill had a remaining capacity of approximately 19.09 million cubic yards (equivalent to 14.8 million tons) and a daily capacity limit of 1,700 tons. Therefore, estimated waste generation and demand for landfill space was anticipated to be accommodated by the Lancaster Landfill, and impacts would be less than significant.

The waste disposal program would provide compliance with solid waste regulations such as the California Integrated Waste Management Act (AB 939), the Medical Waste Management Act, and the County's Source Reduction and Recycling Element and Household Hazardous Waste Element under its Integrated Waste Management Plan. Therefore, the Final EIR identified a less than significant impact related to solid waste regulations.

## **2023 Parcel B Revisions**

### ***Construction and Operation***

The 2023 Parcel B Revisions are on a portion of the site evaluated in the Final EIR; the remainder of the site has been developed consistent with the assumptions in the Final EIR. The 2023 Parcel B Revisions would result in less construction and building areas. Therefore, its generation of solid waste as the result of construction and operation would be incrementally less than anticipated in the Final EIR. Although the remaining capacity of the Lancaster Landfill has decreased to 10.36 million cubic yards (equivalent to 14.51 million tons) it has an increased daily capacity limit of 5,100 tons,<sup>2</sup> it is anticipated this landfill would continue to accommodate the solid waste generation. The 2023 Parcel B Revisions would also comply with the minimum diversion or recycling rate of 50 percent, as required by County regulations. Compliance with County waste disposal procedures for recycling and diversion of waste from County landfills would continue to result in a less than significant impact.

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<sup>2</sup> CalRecycle. SWIS Facility/Site Activity Details-Lancaster Landfill and Recycling Center (19-AA-0050). Available online at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3571?siteID=1035>, accessed October 25, 2023.

## **Conclusion**

Impacts related to solid waste disposal would be similar for the 2023 Parcel B Revisions as compared to those identified in the Final EIR and would continue to be less than significant and no changes to or additional mitigation is required.

## **T. WILDFIRE**

As part of the 2018 *State CEQA Guidelines* updates, new Wildfire checklist questions were added that pertain to projects that are located in, or near, state responsibility areas, lands classified as very high fire hazard severity zones, and other conditions that could pose a hazard with respect to Wildfire. Wildfire impacts of the currently proposed 2023 Parcel B Revisions were evaluated based on the Final EIR. The potential for the currently proposed 2023 Parcel B Revisions to result in new or substantially more adverse significant impacts to Wildfire was evaluated in relation to four questions recommended for consideration by the *State CEQA Guidelines*.

<b>Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to being located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and any of the following:</b>		
<ul style="list-style-type: none"> <li>(a) Substantially impairing an adopted emergency response plan or emergency evacuation plan?</li> <li>(b) Due to slope, prevailing winds, and other factors, exacerbating wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?</li> <li>(c) Requiring the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?</li> <li>(d) Exposing people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?</li> </ul>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## **Final EIR**

### ***Construction and Operations***

The project site is located in an urbanized area and is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, or otherwise in a location that would pose a hazard with respect to wildfire. The project site is within the City of Lancaster and is therefore identified as being

within a Local Responsibility Area.<sup>3</sup> The Final EIR addressed emergency access and response in Transportation; the project would not impact emergency access and would not impair an adopted emergency response plan or emergency evacuation plan. The site is relatively flat and is not subject to unusual wind conditions and is not located in an area that would be exposed to wildfire. The HDHS MACC did not require installation or maintenance of infrastructure that could exacerbate wildfire risks. The HDHS MACC did not expose people or structures to risks resulting from post-wildfire hazards. The Final EIR addressed fire protection in general in Public Services and wildland fires in Hazards. The project would have less than significant impacts related to fire protection in general and no impacts related to wildland fires.

## **2023 Parcel B Revisions**

### ***Construction, Operation and Conclusion***

The 2023 Parcel B Revisions would have no impacts with respect to wildfire and no changes to or additional mitigation is required.

## **U. GROWTH INDUCING IMPACTS**

Pursuant to Sections 15126(d) and 15126.2(d) of the *State CEQA Guidelines*, the Final EIR examined four ways in which the project could foster economic or population growth, or the construction of additional development, either directly or indirectly, in the surrounding environment. The analysis of these factors remains applicable to the Parcel B revisions which are within the assumptions of the Final EIR (i.e., the same use as anticipated but with less building area on Parcel B).

### **1. Would this project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?**

The 2011 HDHS MACC required no major new infrastructure facilities. Existing utility facilities were available adjacent to the site. Existing utility lines were abandoned, and streets vacated to accommodate the project. No new roadways or extension of existing roadways were necessary. Development of the site was determined to be consistent with the planned development on the site, as anticipated by the Lancaster General Plan and the Piute Neighborhood Revitalization Plan. Thus, no

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<sup>3</sup> California Department of Forestry and Fire Protection, CALFire, State Responsibility Area Fire Hazard Severity Zones. September 29, 2023. Available online at: [https://osfm.fire.ca.gov/media/svjif2kl/fhsz\\_county\\_sra\\_11x17\\_2022\\_losangeles\\_3.pdf](https://osfm.fire.ca.gov/media/svjif2kl/fhsz_county_sra_11x17_2022_losangeles_3.pdf), accessed November 28, 2023.

growth inducing impacts from roadway or infrastructure improvements associated with the project were identified.

**2. Would this project result in the need to expand one or more public services to maintain desired levels of service?**

None of the public service agencies consulted during preparation of the Final EIR (Los Angeles County Fire Department and Los Angeles County Sheriff's Department) indicated that the project would necessitate the immediate expansion of their existing resources in order to maintain desired levels of service. In the event that their resources do need to be expanded, funding mechanisms are in place through existing regulations and standard practices to accommodate such growth. The healthcare facilities addressed an existing need and did not induce growth in the area. Therefore, the Final EIR indicated there would be no significant growth-inducing consequences with respect to public services.

**3. Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?**

During project construction, a number of temporary design, engineering, and construction-related jobs are created at the site. Construction crews obtain commercial goods and services from existing businesses, which was not anticipated to create a permanent demand for goods and services. Due to the short-term nature of on-site construction employment, no demand for housing in the area was expected from construction.

The anticipated permanent increase in employees and diversion of patients and visitors to the new healthcare facilities was anticipated to increase demand for economic goods and services in the area. The demand for commercial goods and services from the project was anticipated to potentially induce investment in commercial uses near the site. A number of nearby vacant commercial buildings and vacant and underutilized lots were identified in the Final EIR. This indirect, growth-inducing effect was considered beneficial by the City, as part of its continuing efforts to promote investment in and revitalization of the Piute neighborhood. Demand for housing from on-site employees was anticipated to increase occupancy in the City's vacant dwelling units. Therefore, the growth-inducing effects of the project were expected to be beneficial in terms of increasing economic reinvestment in the surrounding area. The environmental impacts of future development near the site were anticipated to be considered by the City of Lancaster as part of individual environmental reviews, in accordance with CEQA.

**4. Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?**

The project did not require a General Plan Amendment or Zone Change. No increase in the allowable development density on the site was necessary to accommodate the project. The project and any accompanying revitalization of the project area was consistent with the vision for the area, as set forth in the City's General Plan, the Redevelopment Plan for Project No. 5, and the Piute Neighborhood Revitalization Plan.

No changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, fire codes) were proposed or required to implement the project. There were no conflicts with adopted land development regulations and that environmental impacts are minimized.

While the project was anticipated to potentially induce development or redevelopment at surrounding parcels, the potential for reuse of unutilized commercial structures and the (re)development of lands in the surrounding area are subject to property owner discretion and often largely influenced by regional economic conditions and market demands that may have limited or major links to the project. Site improvements may make adjacent areas more attractive to investors and promote redevelopment. These future projects would require independent environmental review under CEQA. Therefore, although the project may be considered a factor in or a precedent-setting action for new development in the area, the impacts of subsequent proposals would require environmental analysis and associated mitigation to avoid or minimize their potential subsequent impacts.

## V. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

## **Final EIR**

The project site does not contain riparian habitat, wetlands, or any other sensitive natural vegetation community. There are no applicable City of Lancaster policies or ordinances protecting biological resources on the site. County policies, including the Significant Ecological Area (SEA) designations and the County's Oak Tree Ordinance, are not applicable to the site because there are no oak trees present and the site is not located within a designated SEA. No Habitat Conservation Plan or Natural Community Conservation Plan applies to the site. Impacts to biological resources would be reduced to a less than significant level with implementation of mitigation measures (MM 4.3-1 and MM 4.3-2). As such, the project would not 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, or reduce the number or restrict the range of rare or endangered plant or animal.

No structures existed on the site prior to project implementation; therefore, there were no historic resources that would be impacted by implementation of the proposed project. Impacts to unknown, subsurface archaeological resources, including those defined as a "historical resource" pursuant to Section 15064.5(a) of the *State CEQA Guidelines*, paleontological resources, and human remains would be reduced to a less than significant level with implementation of mitigation measures (MM 4.4-1 through MM 4.4-3). As such, the project would not eliminate important examples of the major periods of California history or prehistory.

As the project would not significantly impact biological or cultural resources, the project would not result in degradation of the environment.

## **2023 Parcel B Revisions**

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



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

## Final EIR

The Final EIR determined that the 2011 HDHS MACC in conjunction with other past, present, and probable future projects could result in significant cumulative impacts with respect to three issues:

1. **Air quality.** Operation: The project’s estimated maximum daily operational emissions of carbon monoxide (CO) and PM10 (particulate matter smaller than 10 microns in diameter), which is a nonattainment pollutant in the Antelope Valley Air Quality Management District, would remain cumulatively significant and unavoidable with implementation of mitigation measures.
2. **GHG Emissions.** Construction amortized over the life of the project plus operation: The project’s estimated incremental contribution of GHG emissions would remain cumulatively significant and unavoidable with implementation of mitigation measures.
3. **Utilities (water supply).** Operation: The project’s estimated incremental demand for water supply would be cumulatively significant and unavoidable in light of the anticipated future adjudication mandates for restrictions on groundwater pumping.

Section 15130 of the *State CEQA Guidelines* requires that an EIR evaluate potential environmental impacts that are individually limited but cumulatively significant. CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (*State CEQA Guidelines* Section 15355). The purpose of a cumulative analysis is to determine if several projects when evaluated together could result in a significant “cumulative” impact that would otherwise not be considered significant when projects are evaluated one at a time. If several projects considered together have the potential to result in a significant cumulative impact (that is not already identified as a significant project impact), the question becomes whether the project being analyzed

would result in a “considerable” contribution to such a significant cumulative impact. If a project results in a significant impact by itself, then its contribution to a cumulative impact is considerable.

Other than the three issue areas identified above, the Final EIR determined that the 2011 HDHS MACC would not have impacts that are *individually limited* but cumulatively considerable. All issue areas where impacts were determined to be less than significant were determined to not contribute to any cumulatively considerable cumulative impact:

**Aesthetics.** The Final EIR indicated that cumulative projects would be subject to the City’s *Design Guidelines* and therefore would not result in substantial visual degradation and would not contribute to substantial new sources of light and glare. The Final EIR indicated that the project would not result in a cumulatively considerable continuation to aesthetic impacts.

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

**Air Quality.** Construction: The Final EIR indicated that in the unlikely scenario that heavy construction equipment were to operate simultaneously at the site and another nearby site, both diesel PM and odors dissipate quickly, such that no cumulatively considerable impact would occur. Operation: As noted above the project would have significant PM10 and CO emissions that would be considered cumulatively considerable and result in a significant and unavoidable cumulative air quality impact. The project would have a less than significant cumulative air quality impact related to long-term emissions of all other pollutants, and no additional mitigation would be required.

**Biological Resources.** There are no candidate, sensitive, or special-status animal or plant species on-site. The site is highly disturbed and generally contains only low-quality biological resources, and development on the site would cause a negligible increase in regional impacts on biological resources. The Final EIR indicated that because construction of the project would result in less than significant impacts to biological resources with implementation MM 4.3-1 and MM 4.3-2, implementation of the project would not result in a cumulatively considerable impact to biological resources.

**Cultural Resources.** Vacant areas where archaeological resources exist may be subject to grading and excavation that could damage cultural resources. Cultural surveys that are conducted prior to development would allow the early identification of on-site cultural resources and the preservation of significant resources. Compliance with the *State CEQA Guidelines*, Section 15064.5 to determine if there are important cultural resources on individual development sites would prevent cumulative impacts on cultural resources. Since cultural resources are site-specific, no cumulative significant adverse impacts were

expected from future development due to the identified mitigation (MM 4.-1, MM 4.4-2 and MM 4.4-3), as well as required of other projects as part of cultural resource studies for individual development projects.

**Energy.** The Final EIR indicated that the project would adhere to the applicable state and County standards that would result in efficient use of energy for this public facility and would not result in a considerable contribution to a cumulative impact related to energy.

**Geology and Soils.** Geologic and soil impacts are generally site-specific and there is little, if any, cumulative relationship between development projects. The Final EIR indicated that adherence to all relevant plans, codes, and regulations with respect to project design and construction as well as the identified mitigation measures would reduce project-specific and cumulative geologic impacts to a less than significant level.

**Greenhouse Gas Emissions.** Greenhouse gas emissions are cumulative in nature. As discussed above, GHG emissions were identified as cumulatively significant. MM 4.6-1 would reduce emissions but not below a level of significance. The 2011 HDHS MACC would be consistent with relevant policies and plans and impacts to plans and policies would not be cumulatively considerable.

**Hazards and Hazardous Materials.** The Final EIR indicated that Federal, State, and County agencies are responsible for regulating hazardous materials use, storage, handling, generation, transport, and disposal. Compliance of individual projects with pertinent regulations would preserve public health and safety and prevent hazards to existing and future developments. As such, cumulative development in the City was not expected to present significant risks to public health and safety, and there would be a less than significant cumulative impact.

**Hydrology and Water Quality.** Construction activities are regulated under the NPDES General Permit for Construction Activities and are required to prepare SWPPPs to reduce pollutants in the storm water during temporary ground-disturbing activities. Los Angeles County has adopted programs and regulations for long-term storm water pollution mitigation through the requirement for SUSMPs, LID, and storm water discharge prohibitions for individual developments. The City of Lancaster has also adopted drainage regulations that prohibits trash, debris or any other material in any natural or man-made, publicly or privately owned, storm water drainage facility within the City. In addition, the Lahontan RWQCB's WDRs impose conditions, prohibitions, and guidelines for individual developments that may lead to discharges into the storm drain system or surface water bodies. These regulations implement the *Water Quality Control Plan for the Lahontan Region* and help meet the established water quality objectives for both groundwater and surface water bodies. All new cumulative projects would be subject to the City's and/or County's regulations; therefore, no significant cumulative adverse impacts on hydrology and water quality are

expected from the project and the cumulative projects. Future growth and development within the watershed would increase impermeable surfaces and decrease water percolation areas. Increases in impervious surfaces would reduce recharge and increase runoff volumes and flow rates in local drainage channels. The City's drainage channels have been designed to accommodate runoff from the entire watershed, and new developments are required to provide on-site improvements and other storm drainage system upgrades to prevent the creation of flood hazards at downstream areas. The County's LID Manual requires on-site retention of storm water runoff over existing conditions. Thus, the Final EIR indicated that the project would not contribute to cumulative adverse impacts related to alteration of a course of a stream, substantial erosion or siltation, creation of flooding, or the need for storm drain system upgrades. Cumulative impacts would be less than significant, and no mitigation was required.

**Land Use.** The NOP/IS indicated that the 2011 HDHS MACC would not introduce a land use that could divide the established neighborhoods and that the project is consistent with the land use designation and zoning and that the project would not conflict with any applicable plans, policies, or regulations related to land use. Therefore, the project would not contribute to a cumulative impact related to land use.

**Mineral Resources.** The NOP/IS determined that the 2011 HDHS MACC would have no impact on mineral resources and therefore would not contribute to a cumulative impact on mineral resources.

**Noise.** The Final EIR indicated that even if construction activities were to coincide with construction on adjacent sites, it was considered unlikely that noise intensive activities would occur in the closest portion of each of these sites to the residential home at the same time. Therefore, there would be no cumulative construction noise or vibration impacts. The analysis of cumulative traffic-related noise indicated a cumulative noise level increase of 4.2 dBA CNEL at the segment of 3rd Street East from Avenue I to East Avenue H-14, of which 3.8 dBA CNEL was attributed to the project. The resulting noise level of approximately 61 dBA CNEL was below the noise standard applicable to planned uses (70 dBA CNEL) and therefore a less than significant cumulative impact was identified. On all other segments, the cumulative noise impact was identified as 3 dBA or less. A noise level increase of 3 dBA was considered barely perceptible; therefore, no cumulative traffic noise impacts were identified. Operation of on-site mechanical equipment was not expected to be above daytime or nighttime ambient noise levels and therefore was identified as having less than significant operational noise impacts; the incremental contribution the project would not result in significant cumulative noise impacts. Operation of the project would not involve any significant vibration sources, the Final EIR indicated there would be no incremental contribution to cumulative vibration impacts and no additional mitigation is necessary.

**Population and Housing.** The Final EIR indicated that the project would not directly increase population, although the related projects would increase the City's resident population. The project would not conflict

or otherwise adversely impact official County or regional population projections. Therefore, the project would not result in a cumulatively considerable contribution to population growth and no mitigation was required. The project would have no direct contribution to cumulative impacts on housing or housing projections and no mitigation was required. The project would result in an increase in jobs during construction (temporary) and operation. The related projects would also generate jobs during construction and operation. These jobs are expected to be filled by the existing unemployed labor force in the City and the County. Therefore, the project would not result in a cumulatively considerable contribution to employment growth and no mitigation was required. The housing demand generated by the jobs created on site could be met by existing dwelling units in Lancaster. Housing demand generated by new jobs created by the related projects in the City would be met by (1) existing units in Lancaster; (2) projected future units in Lancaster; or (3) housing units located elsewhere in Los Angeles County and the larger SCAG region. The project would have no substantive impact on the County's job/housing ratio and would slightly improve the City's jobs/housing ratio. Therefore, the Final EIR indicated the project would not result in a cumulatively considerable contribution to impacts related to the City's jobs/housing ratio and no mitigation is required.

**Public Services.** The Final EIR indicated the cumulative impacts associated with the development of the site along with other projects may require additional staffing, equipment, and facilities for the LACFD and the LACSD, in order to maintain adequate levels of service and protection. The Final EIR indicated less than significant cumulative impacts to fire protection and law enforcement services from future growth and development through compliance with applicable City and County Code requirements and continued evaluation of these services in the project area. The NOP/IS indicated that the 2011 HDHS MACC would not result in a considerable contribution to cumulative impacts related to demand for other public services (schools, parks, other facilities).

**Recreation.** The NOP/IS indicated the project would not be expected to generate a substantial demand for public parks and recreational facilities because it is not a residential use and therefore would not result in a considerable contribution related to recreational facilities.

**Transportation.** The Final EIR determined that the 2011 HDHS MACC would result less than significant impacts with respect to traffic and would not result in a cumulatively considerable contribution to traffic impacts. The 2011 HDHS MACC would not substantially increase trips and VMT on local roadways.

**Tribal Cultural Resources.** Addressed under Cultural Resources. Tribal consultation under SB 18 would also assist in the prevention of impacts on Native American cultural resources by individual projects.

**Utilities.** Based on developed area and compliance with existing regulations, the Final EIR concludes less than significant impacts to water facilities, wastewater treatment, storm water, and solid waste and that impacts would not be cumulatively considerable. The Los Angeles County Water Works District 40 is the water supplier for the project area; water comes from two sources – groundwater in the Antelope Valley Basin and the State Aqueduct when available. Future availability of groundwater is uncertain. As noted above, there is the potential that the proposed project’s demand for water supply will have a cumulative impact on the water supplies of the Antelope Valley.

**Wildfire.** The site is in a highly urbanized area and is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, therefore the 2011 HDHS MACC would have no impacts related to wildfire and would not contribute to cumulative impacts.

### 2023 Parcel B Revisions

No new projects have been identified that would substantially change the cumulative analysis identified in the Final EIR. Like the 2011 HDHS MACC the 2023 Parcel B Revisions could have a cumulatively considerable contribution with respect to air quality, GHG emissions and utilities (water demand). The other cumulative impacts would remain as discussed in the Final EIR and would be less than significant and would not result in a cumulatively considerable contribution to any issue.

<b>(c) Do the currently proposed 2023 Parcel B Revisions require Subsequent or Supplemental CEQA Documentation with respect to environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Final EIR

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

1. **Air Quality** (Section 4.2 of the Final EIR). The estimated daily maximum and annual operational emissions of large particulate matter (PM10) and carbon monoxide (CO) for the HDHS MACC,

primarily from vehicular emissions, were identified as exceeding the Antelope Valley Air Quality Management District (AVAQMD) standards, resulting in a significant direct impact. PM10 is a nonattainment pollutant in the AVAQMD. Long-term PM10 and CO emissions were also considered cumulatively considerable resulting in a significant cumulative impact.

2. **Greenhouse Gas Emissions** (Section 4.6 of the Final EIR). The estimated annual GHG emissions were calculated to be 8,957 MTCO<sub>2</sub>e/year, including amortized construction emissions. The projected total emissions substantially exceeded the selected significance standard of 900 metric tons of carbon dioxide equivalent per year (MTCO<sub>2</sub>e/yr), resulting in a cumulatively considerable contribution to the global GHG inventory.
3. **Utilities – Water Supply** (Section 4.13 of the Final EIR). The Final EIR indicated there to be uncertainty with respect to how much groundwater would be made available to all entities that currently pump groundwater from the Antelope Valley Basin, resulting in uncertainty with respect to water supplies. As such, water demand from the HDHS MACC was identified as having a cumulative impact on the water supplies of the Antelope Valley.

While there would be significant and unavoidable direct and cumulative impacts related to CO, PM10, and significant and unavoidable cumulative impacts to GHG emissions and water supply, the significance standards applied in these analyses are focused on attaining and/or maintaining regulatory targets for air quality, GHGs, and water supply, rather than on human health risks. While air quality regulatory standards are, in part, related to human health, an individual project's exceedance of a regional emission standard, including exceedance of the GHG significance standard applied for the project, the Final EIR indicated that the project would not in itself result in a "substantial" adverse effect to people.

As set forth in the analyses summarized in Section 3.0, the Final EIR indicated that the project poses a less than significant risk to human health. The project would result in a beneficial effect on human beings through the provision of health care services. The project would not result in significant impacts related to emissions of toxic air contaminants (TACs) and the project did not necessitate the preparation of a health risk assessment to determine the incremental cancer risk associated with air quality concerns, such as for projects in proximity to a freeway or industrial use. Also, the project is not located on a site identified on hazardous materials regulatory databases, and there is no current hazardous materials use or hazardous waste generation at the site. The project's operation would not result in the emission of TACs or the handling of hazardous materials that would result in adverse effects to people. Therefore, for these reasons, the Final EIR indicates that the project would not result in substantial adverse effects to human beings.

## **2023 Parcel B Revisions**

The 2023 Parcel B Revisions would result in less development on Parcel B as compared to what was identified in the Final EIR but is conservatively considered to result in the same significant and unavoidable impacts as identified in the Final EIR:

1. **Air Quality** (Section 4.2 of the Final EIR). The Parcel B Revisions would result in less developed building area on Parcel B as compared to what was analyzed in the Final EIR. In addition, emission controls have reduced vehicle emissions as compared to those assumed in the Final EIR analysis. Therefore, impacts would be similar or more likely less than identified in the Final EIR.
2. **Greenhouse Gas Emissions** (Section 4.6 of the Final EIR). As for Air Quality discussed above, the Parcel B Revisions would result in less developed building area on Parcel B and therefore likely fewer emissions. Therefore, impacts would be similar or more likely less than identified in the Final EIR.
3. **Utilities** (section 3.13 of the Final EIR). The Los Angeles County Waterworks District No. 40 supplies water to the project site; it has two sources of water – groundwater and as available the State Aqueduct. Parcel B Revisions would result in less developed building area on Parcel B as compared to what was evaluated in the Final EIR. Therefore, impacts on water demand would be similar or more likely less than identified in the Final EIR.

For the same reasons indicated above in the discussion of the Final EIR, the Parcel B Revisions would not result in substantial adverse effects to human beings.

## **W. CONCLUSION**

The proposed 2023 Parcel B Revisions described in **Section 2** of this Addendum would be within the assumptions analyzed in the Final EIR. The proposed 2023 Parcel B Revisions have been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the *State CEQA Guidelines*. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions (identified in **Section 1**) apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified 2011 HDHS MACC Final EIR is the appropriate environmental documentation under CEQA for the proposed 2023 Parcel B Revisions.

**Section 3** discusses issue-by-issue how the impacts anticipated for the currently proposed 2023 Parcel B Revisions would be within those previously identified in the 2011 Final FEIR. The Mitigation Monitoring and Reporting Program (MMRP) adopted with the Final EIR would continue to apply as appropriate to the currently proposed 2023 Parcel B Revisions to ensure that all impacts are reduced as necessary and feasible.



As discussed throughout this Addendum (see in particular the summary presented in **Table 3**), the proposed 2023 Parcel B Revisions would result in environmental impacts within those analyzed for every issue with implementation of applicable Project Design Features and mitigation measures as included in the adopted MMRP for the 2011 HDHS MACC.

## 4. REPORT PREPARATION

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### A. LEAD AGENCY

County of Los Angeles  
Department of Public Works  
900 South Fremont Avenue, 5<sup>th</sup> Floor  
Alhambra, California 91803

Parisa Dadmehr, Capital Projects Manager

### B. CONSULTANTS

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811 W. 7th Street, Suite 200  
Los Angeles, California 90017

Jessica Kirchner, AICP, CEO and Managing Principal  
Brett Pomeroy, Associate Principal

Sirius Environmental  
1478 N. Altadena Drive  
Pasadena, California 91107

Wendy Lockwood, Principal

## JESSICA KIRCHNER, AICP

CEO & Managing Principal



### EDUCATION

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

Bachelor of Arts, Journalism, Rutgers University

### AFFILIATIONS

Association of Environmental Planners, Board Member, Legislative Committee

American Institute of Certified Planners, Certified Planner

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

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

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

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

## BRETT POMEROY

Associate Principal



### EDUCATION

Bachelor of Science, Natural Science, Loyola Marymount University

### AFFILIATIONS

Association of Environmental Planners (AEP)

CEQA and NEPA workshops and conferences

Completed AERMOD Dispersion Modeling Training Seminar held by Lakes Environmental

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

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

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

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

Wendy Lockwood

**Education**

Sussex University, England, Chemistry, concentration in Environmental Science  
Master's degree, Candidate, Environmental Management, University of San Francisco

**Professional Affiliations**

Association of Environmental Professionals  
Los Angeles Conservancy  
American Planning Association

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

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

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

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

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

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

## **APPENDIX A**

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### **HDHS MACC Project Design Features and Regulatory Requirements**

# APPENDIX A

## HDHS MACC PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

### AESTHETICS

#### Project Design Features

**PDF 4.1-1:** The HDHS MACC Landscape Plan includes various hardscape and landscape features that are intended to provide a pedestrian-friendly and aesthetically pleasing environment and approximately 50 percent shade/vegetation cover. Vegetated bioswales would be constructed along the parking area.

**PDF 4.1-1:** An approximate three-foot-high concrete wall will be located south of the Main Ambulatory Care Building along East Avenue I. Another concrete wall will circle around the southwestern corner of the main building, with an approximate six-foot-high metal screen fence enclosing an outdoor courtyard area. The low walls will feature mounted letters identifying the facility. To shelter the adjacent residential areas from activities associated with the HDHS MACC Project, an approximate six-foot-tall concrete masonry unit wall will be located along 3<sup>rd</sup> Street East, East Avenue H-13, and 4th Street East.

#### Regulatory Requirements

**RR 4.1-1:** The HDHS MACC and supporting public service/commercial development shall comply with the County's lighting standards as set forth in Section 22.52.820 of the County Code.

**RR 4.1-1:** Proposed off-site improvements within the public right-of-way shall comply with applicable standards in the City of Lancaster's *Design Guidelines* as they relate to streetscape design for sidewalks and parkways.

### AIR QUALITY

#### Project Design Features

No project design features (PDFs) have been identified for air quality. PDF 4.6-1 and PDF 4.6-2 from Section 4.6, Greenhouse Gas Emissions, and PDF 4.12-4 from Section 4.12, Transportation, would contribute to the reduction of vehicle trips, and therefore reduce air quality impacts.

#### Regulatory Requirements

**RR 4.2-1:** All construction activities shall be conducted in compliance with Antelope Valley Air Quality Management District Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. Compliance with this rule will reduce short-term particulate pollutant emissions. Contractor compliance with Rule 403 requirements shall be mandated in the contractor's specifications.

**RR 4.2-2:** All construction activities shall be conducted in compliance with Antelope Valley Air Quality Management District Rule 402, Nuisance, which states that a Project 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”.

**RR 4.2-3:** All architectural coatings shall be in compliance with Antelope Valley Air Quality Management District Rule 1113, which limits the volatile organic compound content of architectural coatings.

**RR 4.2-4:** Commercial and medical entities that occupy the Project site shall comply with Antelope Valley Air Quality Management District Rule 1401, which addresses toxic air contaminant (TAC) emissions. In particular, these rules forbid the construction of a stationary source that imposes unacceptable risks from TAC emissions to surrounding neighbors and workers.

**RR 4.2-5:** The Project shall comply with all permitting requirements of the Antelope Valley Air Quality Management District regarding the construction and operation of the proposed diesel generator, including compliance with Rules 201, 203, 212, New Source Review, and the Airborne Toxic Control Measures for Stationary Compression Ignition Engines (Title 17 *California Code of Regulations* Section 93115).

## **GEOLOGY AND SOILS**

### **Project Design Feature**

**PDF 4.5-1:** Erosion control measures would be implemented during construction activities, as specified in the Erosion Control Plan for construction on Parcel A. A stabilized construction entrance will be provided on 3rd Street East, with a triple row of sandbags along the western, southern, and eastern site boundaries of Parcel A. A designated concrete truck washout area, vehicle equipment area, material delivery and storage area, and waste collection area would be provided on site. Elements of the Erosion Control Plan may be incorporated into the SWPPP required by RR 4.8-1.

### **Regulatory Requirement**

**RR 4.5-1:** The Project’s geotechnical design is governed by the County Building Code, which incorporates, by reference, the 2007 California Building Code (CBC). Project implementation shall comply with all applicable requirements of the 2007 CBC and any applicable ordinances set forth by the County of Los Angeles, or the most recent County building and seismic codes in effect at the time the grading plans are approved.

## **GREENHOUSE GAS EMISSIONS**

### **Project Design Features**

**PDF 4.6-1:** The Project site would be served by AVTA Bus Route 11, which has approximately 30 minutes between each approaching bus, and service to the site continues between approximately 5:40 AM to 10:20 PM on weekdays, which is a level of service improvement when compared to bus service at the existing HDHS MACC.



PDF 4.6-2: The County offers an IRS-approved commuter benefit program that deducts commuting costs from the employee's paycheck on a pre-tax basis to pay for eligible transit expenses.

## **Regulatory Requirements**

**RR 4.6-1:** Both Parcel A and Parcel B of the proposed HDHS MACC Project shall be designed and constructed in accordance with the County's Green Building Program, as set forth in the Los Angeles County Code: Section 12.84.410 et seq., Low Impact Development Standards; Section 21.52.2200 et seq., Drought Tolerant Landscaping; and Section 22.52.2100, Green Building. The Project shall be designed in accordance with the County's Green Building Program and to achieve eligibility for a LEED<sup>TM</sup> Silver or better rating as required by the County Green Building ordinance. The Green Building Program requires project designs and practices that will result in the conservation of water and energy resources. Compliance with these requirements shall be verified through the site plan review process and final compliance shall be determined by the County of Los Angeles Department of Public Works. The Green Building Program would require features/actions relative to the Project including, but not limited to:

- Achievement of at least 15 percent more energy efficiency than the 2005 Title 24 California Energy Efficiency Standards;
- Installation of smart irrigation controllers, drought-tolerant vegetation (per Chapter 22.52 requirements), and high-efficiency toilets;
- Recycle/reuse of at least 65 percent of non-hazardous construction/demolition debris by weight; and
- Planting of at least three 15-gallon trees per every 10,000 sf of non-residential developed area with at least 65 percent of the trees being drought-tolerant.

**RR 4.6-2:** The HDHS MACC Project (Parcels A and B) shall comply with the Title 24 Energy Efficiency Standards. These standards prescribe required energy efficient measures, including ventilation, insulation, and construction and the use of energy- saving appliances, conditioning systems, water heating, and lighting. Development plans shall be subject to plan check and building permits and shall include written notes demonstrating compliance with energy standards and shall be reviewed and approved by the County Building Department prior to building permit issuance.

**RR 4.6-3:** The HDHS MACC Project (Parcels A and B) shall comply with the Title 24 Green Building Standards. These standards prescribe measures for, but not limited to, water conservation, building commissioning, clean vehicle parking, and solid waste recycling. Development plans shall be subject to plan check and building permits and shall include written notes demonstrating compliance with Green Building standards and shall be reviewed and approved by the County Building Department prior to Project construction.

## **HAZARDS AND HAZARDOUS MATERIALS**

### **Project Design Features**

**PDF 4.7-1:** On Parcel A, a Materials Management Building/Central Plant would be constructed as a separate building adjacent to the High Desert Health System Multi-care Ambulatory Care Center, where hazardous materials and wastes, a diesel generator, fuel storage tank, medical vacuum pumps, and air compressors would be located. Other medical, surgical, and general supplies and wastes would also be stored in this building. A segregated storage area for medical gas tanks would be provided northwest of this building.

**PDF 4.7-2:** Fire sprinkler systems, fire alarm systems, smoke detectors, visual strobe units, and/or fire alarm speakers would be provided in all buildings at the HDHS MACC Main Ambulatory Care Building.

## **Regulatory Requirements**

**RR 4.7-1:** The Project shall comply with applicable provisions of the Toxic Substances Control Act regarding the use, removal, relocation or service of pole-mounted transformers on the site that may contain polychlorinated biphenyls through coordination with Southern California Edison, which retains responsibility of management of the transformers.

**RR 4.7-2:** All hazardous materials and/or wastes shall be transported only by a Licensed Hazardous Waste Hauler, who shall be in compliance with all applicable State and federal requirements, including U.S. Department of Transportation regulations under 49 Code of Federal Regulations (Hazardous Materials Transportation Act) and Caltrans standards pursuant to the Hazardous Materials Transportation Act.

**RR 4.7-3:** In accordance with Section 1541 of Title 8 of the *California Code of Regulations*, persons planning new construction, excavations, and new utility lines near or crossing existing high-pressure pipelines, natural gas/petroleum pipelines, electrical lines greater than 60,000 volts, and other high-priority lines are required to notify the owner/operator of the line and must identify the locations of subsurface lines prior to any ground disturbance for excavation. Coordination, approval, and monitoring by the owner/operator of the line would avoid damage to high-priority lines and the creation of hazards to the surrounding area.

**RR 4.7-4:** The Project shall comply with all applicable permitting, reporting, and other requirements of Los Angeles County Fire Department Health Hazardous Materials Division (the designated Certified Unified Program Agency), including, but not limited to, compliance with the:

- Hazardous Waste Generator Program;
- Aboveground Storage Tank Program;
- Hazardous Materials Release Response Plan and Inventory Program;
- Risk Management and Prevention Program; and
- Hazardous Materials Management Plan and Inventory Statement Program.

**RR 4.7-5:** The Project shall comply with all applicable provisions of the Medical Waste Management Act (*California Health and Safety Code* Sections 117600–1118360) regarding the permitting, generation, handling, and disposal of medical wastes as enforced by the California Department of Public Health.

## **HYDROLOGY**

### **Project Design Features**

**PDF 4.8-1:** The HDHS MACC (Parcel A) would include the following storm drain infrastructure improvements:

- A 6-inch storm drain line running around the Main Ambulatory Care Building and then northerly as a 12-inch line to the underground detention and infiltration system.
- A 15-inch overflow pipe from the underground detention and infiltration system that would discharge runoff into a parkway drain at East Avenue H-13.

- Eight-inch storm drain pipes would convey runoff from the bioswales and connect to a 12-inch line that, in turn, connects to the 15-inch overflow pipe.
- A 4-inch line that would convey storm water from the northwestern section of the site to the 12-inch line connecting to the underground detention and infiltration system.
- A 6-inch pipe from the northern end of the site that extends southerly and then westerly to the 12-inch line connecting to the underground detention and infiltration system.

### **Regulatory Requirements**

**RR 4.8-1:** The County shall file a Permit Registration Document (PRD) with the SWRCB for the High Desert Health System Multi-service Ambulatory Care Center Project in order to obtain coverage under National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities, Order No 2009-009-DWQ, NPDES No. CAS000002, (or the latest approved general permit). The PRD consists of a Notice of Intent (NOI); Risk Assessment; Site Map; Stormwater Pollution Prevention Plan (SWPPP); annual fee; and a signed certification statement. Pursuant to permit requirements, the County shall require the Project Contractor/Developer to incorporate Best Management Practices for reducing or eliminating construction-related pollutants in the site runoff in compliance with the SWPPP.

**RR 4.8-2:** The HDHS MACC Project (Parcel A and Parcel B) shall be constructed in compliance with the County's Stormwater and Runoff Pollution Control Ordinance (Chapter 12.80 of the County Code), which identifies prohibited discharges and connections; facilities required to obtain an National Pollutant Discharge Elimination System permit; Best Management Practices for construction activities and industrial and commercial facilities; and enforcement procedures.

**RR 4.8-3:** The County shall file a Notice of Intent with the Lahontan Regional Water Quality Control Board (LRWQCB) for fire hydrant testing or flushing and non-potable water utility pipeline installation in accordance with NPDES Permit No. CAG996001 "General Permit for Limited Threat Discharges to Surface Waters", if required based on information provided by the discharger in consultation with the LRWQCB.

**RR 4.8-4:** The HDHS MACC Project (Parcel A and Parcel B) shall be constructed in compliance with the County of Los Angeles Department of Public Works' *Manual for the Standard Urban Stormwater Mitigation Plan (SUSMP)* and *Low Impact Development (LID) Standard Manual* requirements.

### **NOISE**

#### **Project Design Feature**

**PDF 4.9-1:** An approximate six-foot-tall concrete masonry unit wall will be constructed along 3rd Street East, East Avenue H-13, and 4th Street East, which would be surrounded by landscaping to soften the appearance of the wall and provide a transition to the adjacent land uses.

### **Regulatory Requirements**

**RR 4.9-1:** In accordance with Section 8.24.040 of the City of Lancaster Municipal Code, construction activities that generate noise that could create a disturbance across a property line shall not occur between the hours of 8:00 PM and 7:00 AM on weekdays, at any time on Sunday, or a federal holiday.

**RR 4.9-2:** As stated in Section 17.12.890 of the City of Lancaster Municipal Code, activities that generate noise by the nature of their function and/or processes shall be required to demonstrate that the noise levels emitted from the use shall not exceed 65A-weighted decibels (dBA) at any property line which abuts a commercial or residential zone or use.

## **POPULATION AND HOUSING**

### **Project Design Feature**

**PDF 4.10-1:** Current eligible employees at the existing High Desert Health System Multi-service Ambulatory Care Center (HDHS MACC) will have their employment with the County transferred to the new HDHS MACC.

## **PUBLIC SERVICES**

### **Project Design Features**

**PDF 4.11-1:** In consultation with the Los Angeles County Fire Department, fire lanes have been designated on Parcel A to provide access for emergency vehicles. Two new hydrants with the required fire flows would also be provided on site, along with one new off-site hydrant.

**PDF 4.11-2:** The High Desert Health System Multi-service Ambulatory Care Center (Parcel A) shall have on-site security personnel at all times.

**PDF 4.11-3:** The High Desert Health System Multi-service Ambulatory Care Center (HDHS MACC) Main Ambulatory Care Building shall be equipped with an electronic surveillance system consisting of a camera-recording system, video monitors, and video acquisition unit software. Panic buttons, card readers, door alarms, door controllers, private intercoms, glass break sensors, and motion detectors shall also be provided as part of the integrated security system at the HDHS MACC.

**PDF 4.11-4:** A central monitoring station shall be provided adjacent to the main entry of the High Desert Health System Multi-service Ambulatory Care Center Main Ambulatory Care Building, which will include a work station for the surveillance system and a Los Angeles County Sheriff's Department office.

### **Regulatory Requirements**

**RR 4.11-1:** The High Desert Health System Multi-service Ambulatory Care Center Project shall be constructed in compliance with the Los Angeles County Fire Code and all Los Angeles County Fire Department (LACFD) requirements, which include standards for building construction, emergency access, fire flow, water main, and fire hydrants. The LACFD shall be provided building plans for review and approval and inspections for compliance with fire safety regulations shall be completed prior to issuance of certificate of occupancy.

**RR 4.11-2:** The High Desert Health System Multi-service Ambulatory Care Center Project shall comply with Chapter 67 of Title 26 of the County Code, which contains minimum construction standards for resistance to unlawful entry. This chapter outlines the requirements for sliding glass doors, sliding glass windows, doors, lights, locks, openings, hatchways, and scuttles to deter trespassing and theft.

## TRANSPORTATION

### Project Design Features

**PDF 4.12-1:** All site access driveways will be stop-sign controlled with stop signs facing the Project driveways. At a minimum, it is assumed that all site driveways will accommodate one lane of inbound traffic and one lane of outbound traffic. Specifically, site driveways will include:

- **East Avenue I Driveway.** The East Avenue I Project driveway will be located on the northern side of Avenue I approximately mid-block between 3rd Street East and 5th Street East along the southerly property frontage. The driveway will serve as the primary driveway to the High Desert Health System Multi-service Ambulatory Care Center and Parcel B and associated parking areas. Near the driveway, East Avenue I will be reconstructed to provide a westbound right-turn only (Project site egress) and eastbound left-turn pockets (Project site ingress). The driveway will accommodate left-turn and right-turn ingress turning movements. Egress from the East Avenue I driveway will be restricted to right-turn movements only.
- **3rd Street East Driveway.** The proposed 3rd Street East driveway will serve as the primary access to physicians and employee staff parking. 3rd Street East will be reconstructed to provide right-turn lane installations for the southbound approach on 3rd Street East and a westbound approach on Avenue I along the Project frontage. The 3rd Street East Project driveway will provide full access (i.e., left-turn and right-turn ingress and egress turning movements). A dedicated truck entrance providing access to the Material Management Building/Central Plant of the High Desert Health System Multi-service Ambulatory Care Center will also be accessed from 3rd Street East.
- **East Avenue H-14/4th Street East Driveway.** The East Avenue H-14 at 4th Street East Project driveway will provide secondary access to the High Desert Health System Multi-service Ambulatory Care Center and the supporting public service/commercial development. One roundabout will be installed at the 4th Street East/ East Avenue H-14 intersection to provide a transition between the Project and the nearby local residential neighborhood and also to serve as traffic-calming measures.

**PDF 4.12-2:** A separate truck entrance will be provided on 3rd Street East for the exclusive use of delivery trucks that will load and unload at the Materials Management Building of the High Desert Health System Multi-service Ambulatory Care Center.

**PDF 4.12-3:** The High Desert Health System Multi-service Ambulatory Care Center has been designed compliance with Los Angeles County Fire Department (LACFD) emergency access requirements, such as access driveways, aisle widths, and building distance; hydrants and fire flows; and other fire-prevention measures. The primary internal circulation route would be a 30- to 32-foot-wide fire lane extending through Parcel A between the main public entrance on East Avenue I and the secondary staff/public entrance on 3rd Avenue East. One off-site fire hydrant (required fire flow of 3,750 gpm at 20 psi for 5 hours) shall be installed on the western side of 3rd Street, in accordance with LACFD requirements.

**PDF 4.12-4:** A bus turnout will be constructed at the location of the existing bus stop on East Avenue I, just west of 5th Street East, to facilitate the use of bus transit service by visitors, employees, and patrons of the Project and to avoid conflicts with vehicle traffic flow on East Avenue I.

**PDF 4.12-5:** The majority of the area within Parcel A will be developed with surface parking areas, sidewalks, and drive aisles. The High Desert Health System Multi-service Ambulatory Care Center will

include a total of 722 parking spaces (632 standard parking spaces, 80 Americans with Disabilities Act parking spaces, and 10 van parking spaces).

## **Regulatory Requirements**

**RR 4.12-1:** Construction activities on public rights-of-way shall be conducted in accordance with a Traffic Control Plan prepared and implemented in compliance with the Manual on Uniform Traffic Control Devices and the City's requirements. Standard drawings and specifications and are subject to approval by the Director of Public Works through the City's plan check process. This includes improvement of perimeter roadways in accordance with the City's standards for applicable street classifications.

**RR 4.12-2:** Parcel B development shall be subject to plan check review and approval by the Los Angeles County Fire Department for compliance with emergency access requirements and other fire-prevention measures.

**RR 4.12-3:** In accordance with County Code Section 22.52.1000 that requires 1 parking space for every 250 sf of medical office building, Parcel B will be developed with a minimum of 269 parking stalls.

**RR 4.12-4:** In accordance with Title 24 Green Building Standards, the HDHS MACC Project (Parcel A and Parcel B) shall provide permanently anchored bicycle racks within 100 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of visitor motorized vehicle parking capacity, with a minimum of one 2-bike capacity rack.

## **UTILITIES**

### **Project Design Features**

**PDF 4.13-1:** The proposed High Desert Health System Multi-service Ambulatory Care Center would require the following new on-site water infrastructure improvements:

- An on-site, 8-inch polyvinyl chloride (PVC) fire service water line connecting to the existing 8-inch water main located in 3rd Street East and the existing 12-inch line located in East Avenue I to provide adequate fire flows and pressures at 2 new fire hydrants.
- A 4-inch PVC domestic water line with a backflow preventer at the Materials Management Building that would connect to the water main located in 3rd Street East.
- A 6-inch PVC fire service water line with a backflow preventer and Los Angeles County Fire Department (LACFD) connection assembly at the Materials Management Building connecting to the water main located in 3rd Street East to provide fire service to the Main Ambulatory Care Building.
- Two on-site fire hydrants (required fire flow of 2,500 gallons per minute [gpm] at 20 pounds per square inch [psi] for 2 hours) will be installed in accordance with LACFD requirements.
- Abandonment of the existing water lines in East Avenue H-14 and Raysack Avenue.

**PDF 4.13-2:** The proposed High Desert Health System Multi-service Ambulatory Care Center would require the following new on-site wastewater infrastructure improvements:

- A four-inch sewer line to convey wastewater from the loading docks of the Material Management Building to the existing eight-inch sewer main located in 3rd Street East;

- A six-inch sewer line to convey wastewater from the Materials Management Building northerly and then westerly to the existing eight-inch sewer main located in 3rd Street East;
- A four-inch house connection to convey wastewater from the Crafts Building to the proposed six-inch sewer line that would serve the Materials Management Building;
- A six-inch sewer line extending into the Main Ambulatory Care Building at two locations and connecting to the existing eight-inch sewer main located in East Avenue I; and
- Abandonment of the sewer lines in East Avenue H-14, Raysack Avenue, and the old alignment of 3rd Street East.

**PDF 4.13-3:** The solid waste collection and recycling area for the High Desert Health System Multi-service Ambulatory Care Center would be located in the Materials Management Building, along with a cardboard baler and a trash compactor. Solid wastes will be collected from throughout the facility and brought to the loading dock and dumped into a self-contained compactor. General recyclables (glass, plastic, aluminum) and universal recyclables (fluorescent light tubes, electronic wastes) will be collected and brought to the staging room located at the loading dock. Medical wastes would also be stored at this building prior to off-site disposal. A designated accumulation area for the storage of medical waste containers prior to transportation or treatment shall be secured so as to deny access to unauthorized persons. Warnings, procedures, and requirements for handling, containerizing, storage, and disposal shall be posted and included in educational materials for employees.

**PDF 4.13-4:** The proposed High Desert Health System Multi-service Ambulatory Care Center would include the following new energy and communication infrastructure improvements:

- Medium-pressure (2–5 psi) polyvinyl chloride natural gas line at the Materials Management Building that would connect to the existing gas main in 3rd Street East;
- Abandonment of the existing gas lines in East Avenue H-14 and the old alignment of 3rd Street East;
- An underground electrical line from the transformer and switch pad at the Central Plant, extending northerly and then westerly toward a proposed line on 3rd Street East;
- Abandonment and removal of the overhead lines and power poles along the alley between East Avenue H-13 and East Avenue H-14 and the overhead lines extending northerly from this alley; and
- New telephone and communication lines to connect to existing lines serving the area.

**PDF 4.13-5:** For the proposed High Desert Health System Multi-service Ambulatory Care Center, wireless connections, wide area network (WAN) connections, telephone systems, intercom systems, radio systems, master clock system, overhead paging system, nurse call and code blue system, television system, would all be integrated into a data network system through wired and wireless connections.

Roadway improvements to serve the Project, as depicted on Exhibit 3-1, would include the following:

- Addition of a northbound right-turn lane on westbound East Avenue I at its intersection with 3rd Street East;
- Addition of a northbound right-turn lane on westbound East Avenue I at the main driveway;
- Addition of a westbound right-turn lane on southbound 5th Street East at its intersection with East Avenue I;
- Construction of a landscaped raised median on East Avenue I between 3rd Street East and 5th Street East, with a northbound left-turn lane pocket into the main driveway of the site for eastbound traffic; and

- Addition of a westbound right-turn lane on southbound 3rd Street East at its intersection with East Avenue I.

All roadway improvements that require widening will also include associated curb and gutter improvements. The sidewalks and parkways adjoining the Project site would be improved as part of the Project. Improvements would involve the reconstruction of sidewalk pavement; landscaping of the parkways; removal or relocation of driveways; provision of Americans with Disabilities Act-compliant curb ramps; and relocation of streetlights, hydrants, and utility poles.

### **Regulatory Requirements**

**RR 4.13-1:** All water, sewer, storm drain, and other utility infrastructure improvements associated with the proposed High Desert Health System Multi-service Ambulatory Care Center Project shall be conducted in compliance with the applicable regulations set forth in the *County of Los Angeles Municipal Code*, which incorporates by reference the California Building Code, California Electrical Code, California Mechanical Code, California Plumbing Code and California Fire Code, subject to specific amendments.

**RR 4.13-2:** In compliance with the Sanitation Districts of Los Angeles County (LACSD) Wastewater Ordinance, all wastewater discharges into LACSD facilities from the High Desert Health System Multi-service Ambulatory Care Center Project shall be required to comply with the discharge standards set forth to protect the public sewerage system. The LACSD Surcharge program requires all industrial companies discharging to the LACSD sewerage system to pay their fair share of the wastewater treatment and disposal costs, and the Connection Fee program requires all new users of the LACSD sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities.

**RR 4.13-3:** In compliance with Section 15.64.060 of the City of Lancaster's Municipal Code, all new development in the City shall pay a drainage/flood control improvements fee to mitigate the stormwater runoff impacts caused by new development. The City's current Drainage Impact Fee is \$0.35 per square foot for commercial/industrial properties.

**RR 4.13-4:** Prior to commencement of construction activities, a Recycling and Reuse Plan (RRP) must be submitted to the Los Angeles County Department of Public Works, Environmental Programs Division for review and approval. Construction activities on the Project site shall be conducted in compliance with Section 22.52.2100, Green Building of the Los Angeles County Code, which requires the recycling/reuse of at least 65 percent of non-hazardous construction/demolition debris by weight.



## **APPENDIX B**

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**High Desert Health System Multi-Service Ambulatory Care Center; 2023  
Parcel B Revisions - Traffic Impact Analysis Update**



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## MEMORANDUM

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**To:** County of Los Angeles, Department of Public Works **Job No.:** 1250.009  
**From:** Brett Pomeroy, Associate Principal, Impact Sciences, Inc.  
**Subject:** High Desert Health System Multi-Service Ambulatory Care Center;  
2023 Parcel B Revisions - Traffic Impact Analysis Update  
**Date:** November 8, 2023

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### OVERVIEW

The Los Angeles County Board of Supervisors (Board), acting on behalf of the County, certified on May 31, 2011, the High Desert Health System (HDHS) Multi-Service Ambulatory Care Center (MACC) Final EIR (Final EIR), State Clearinghouse Number 2010051005. The name of the project has since been changed to the High Desert Regional Health Center Campus; the new High Desert Regional Health Center (constructed on Parcel A) was completed consistent with the assumptions of the 2011 Final EIR and opened in early 2016. However, this memorandum continues to use the original name (HDHS MACC) so that continuity of environmental documentation is clear. The purpose of this memorandum is to update the project trip generation estimates in the Final EIR, to reflect the 2023 Parcel B Revisions (described below) and to determine whether the changes have the potential to result in new or worsened significant traffic impacts.

In addition to the High Desert Regional Health Center constructed on Parcel A, the County completed construction of and opened, in July 2021, the 9,900 square foot High Desert Mental Health Urgent Care Center (HDMHUCC) on two acres of Parcel B.

### Approved Project – Land Uses and Trip Generation Estimates

The HDHS MACC 21-acre project site (15 acres in Parcel A and 6 acres in Parcel B) is located in the City of Lancaster within the center of the Antelope Valley in the northern portion of Los Angeles County, and approximately 70 miles north of downtown Los Angeles. The project site is located on East Avenue I between 3rd Street East and 5th Street East. Regional access to the site is provided by State Route (SR) 14 (i.e., the Antelope Valley Freeway), which is located approximately 2.5 miles to the west and accessed via

East Avenue I. Local access to the site is provided by numerous roadways, including East Avenue I, 3rd Street East, 4th Street East, 5th Street East, East Avenue H-13, and East Avenue H-14. Parcel B is located approximately 60 feet south of duplex homes across E. Avenue H 14 and about 90 feet west of single-family homes across 5<sup>th</sup> Street E (with one property identified as an elderly care facility).

The project evaluated in the Final EIR included two phases:

1. Construction of a new, approximately 142,000-square-foot (sf) HDHS MACC on Parcel A (approximately 15 acres).
2. Construction of approximately 67,250 sf of supporting public service/commercial uses on Parcel B (approximately 6 acres). The specific uses on Parcel B were not defined but were anticipated to be complementary to the outpatient services provided at the HDHS MACC and were identified as potentially including uses such as doctor's offices, senior care services, mental health services, and/or a café. Parcel B was anticipated to also include a minimum of 269 parking spaces.

The Final EIR found project operation would increase trips on local roadways (8,488<sup>1</sup> total daily trips for Parcels A and B, including 2,914 trips on Parcel B). The analysis in this memorandum focuses on proposed Parcel B Revisions and therefore, the following table (**Table 1**, which is Table 4.12-4 in the Final EIR) identifies the trip generation for Parcel B as evaluated in the Final EIR. The Final EIR traffic analysis focused on delay at intersections and found less-than-significant impacts with respect to delay. Impacts to intersections and levels of service are no longer considered significant under CEQA; traffic impacts are now evaluated based on vehicle miles traveled (VMT).<sup>2</sup>

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<sup>1</sup> The Traffic Study (Linscott, Law & Greenspan, September 2, 2010) included in Appendix G of the Final EIR identifies 8,506 trips resulting from Parcels A and B with 2,914 from Parcel B (the same as the Final EIR) and 5,592 trips from Parcel A, which is 18 more trips than indicated in the text of the Final EIR. These differences had no effect on the Final EIR and have no effect on this memorandum.

<sup>2</sup> As part of the 2018 *State CEQA Guidelines* updates, the CEQA Guidelines Appendix G checklist was revised to address consistency with *State CEQA Guidelines* Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The County published a VMT methodology in June 2020, updated September 2, 2020.

**Table 1**  
**Final EIR Parcel B Trip Generation**

Land Use	Size	Daily Trip Ends <sup>a</sup> Volume	AM Peak Hour Volumes <sup>a</sup>			PM Peak Hours Volumes <sup>a</sup>		
			In	Out	Total	In	Out	Total
Parcel B – Program Level								
Specialty Retail <sup>b</sup>	67,250 gsf	2,914	52	35	87	81	102	183
gsf: gross square feet								
<sup>a</sup> Trips are one-way traffic movements, entering or leaving.								
<sup>b</sup> ITE Land Use Code 814 (Specialty Retail Center) trip generation equation rates used for daily and PM peak hour. San Diego Association of Governments (SANDAG) trip rate used for AM peak hour (AM peak hour ITE trip equation for Specialty Retail Center land use not available).								
<ul style="list-style-type: none"><li>Daily Trip Equation: Trips = 42.78 (1,000 sf of gross leasable floor area) + 37.66; 50% inbound / 50% outbound.</li><li>AM Peak Hour Trip: 3% of daily trip generation; 60% inbound / 40% outbound.</li><li>PM Peak Hours Trip Equation: Trips = 2.40 (1,000 SF of gross leasable floor area) + 21.48; 44% inbound / 56% outbound.</li></ul>								
Sources: ITE 2008 and SANDAG 2002.								

### Proposed 2023 Parcel B Revisions – Land Uses and Trip Generation Estimates

The currently proposed 2023 Parcel B Revisions would provide additional mental health facilities on approximately four acres of Parcel B:

1. 9,900 square foot adult (18 and older) Crisis Residential Treatment Program (CRTP) building; and
2. 9,900 square foot building divided equally between a Children’s Mental Health (MH) Hub and Children’s Crisis Stabilization Unit (CSU).

The 2023 Parcel B Revisions, together with the existing HDMHUCC, would result in less than half the total building area on Parcel B as compared to what was evaluated in the Final EIR and therefore would result in fewer trips and fewer VMT. Specifically, as a result of the MHUCC and the Parcel B Revisions, **Table 2** shows trips from Parcel B are conservatively estimated to be 1,215 (i.e., less than half of the 2,914 trips identified for Parcel B in the Final EIR). The mental health uses on Parcel B are consistent with the options for use of Parcel B identified in the Final EIR.

The Final EIR identified five bus transit lines and routes adjacent to or in close proximity to the site, with one of these transit lines (i.e., AVTA No. 11) directly serving the site along the project frontage. AVTA No. 11 provides service for an average (i.e., an average of the directional number of buses during the peak hours) of approximately four buses during the AM peak hour and four buses during the PM peak hour. Projects adjacent to transit have fewer impacts with respect to VMT because some trips can be made by

transit rather than car. In addition, as a health facility providing services to the local community, the use is necessary and would reduce the need for patients to seek treatment in facilities farther away.

**Table 2**  
**2023 Parcel B Revisions – Trip Generation<sup>a</sup>**

Land Use	Size	Daily Trip Ends Volumes	AM Peak Hour Volumes			PM Peak Hour Volumes		
			In	Out	Total	In	Out	Total
HDMHUCC (Existing)	9,900 sf	405	18	5	23	7	20	27
C RTP	9,900 sf	405	18	5	23	7	20	27
Children's MH & CSU	9,900 sf	405	18	5	23	7	20	27
<b>Total</b>	<b>29,700 sf</b>	<b>1,215</b>	<b>54</b>	<b>15</b>	<b>69</b>	<b>21</b>	<b>60</b>	<b>81</b>
<sup>a</sup> Consistent with the Final EIR, this analysis uses rates based on Trip Generation, 8 <sup>th</sup> Edition, ITE, 2008. In the Final EIR Parcel A was evaluated as medical office (see Table 4.12-1 of Final EIR) -- ITE Land Use Code 720 (Medical-Dental Office Building): <ul style="list-style-type: none"> <li>Daily Trip Rate: 40.89 trips/1,000 SF; 50% inbound/50% outbound (the Final EIR subtracts 214.97 trips from the daily rate for this use on Parcel A – no subtractions are made here, and therefore if anything this analysis is conservative. In addition, it is noted that, as a residential facility, the CRTP is expected to generate trips at a lesser rate than medical office, further making this analysis conservative.</li> <li>AM Peak Hour Trip Rate: 2.3 trips/1,000 SF; assume 79% inbound/21% outbound</li> <li>PM peak Hour Trip Rate: 2.7 trips (the Final EIR identifies a log-based formula that works out to be this rate)/1,000 SF; assume 27% inbound/73%outbound</li> </ul>								

## Conclusion

For the reasons discussed above, construction and operational traffic impacts continue to be considered less than significant. The proposed 2023 Parcel B Revisions would not result in new or increased significant adverse impacts associated with traffic and no changes to previously adopted mitigation measures are required. As this memorandum identifies no new or worsened impacts, an Addendum to the Final EIR is the appropriate form of CEQA documentation with respect to traffic impacts.

